

# RSC-G-022

## Guidance for operators of Heritage and Minor Railways

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Guidance to assist the operators of Heritage and Minor railways engaged in the carrying of passengers

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## 1 Introduction

This document is intended to provide guiding principles to operators of railways classed as 'Heritage' and owners of equipment used on such railways. A Heritage railway is considered to be that where services are operated for historic or tourist reasons (Railway Safety Act 2005) and exist to:

- Preserve, re-create or simulate railways of the past; or
- Demonstrate or operate historical or special types of motive power or rolling stock; and
- Is exclusively or primarily used for tourist, educational or recreational purposes.

The term 'Heritage Railway' also encompasses railways built for pleasure purposes or to fulfil a transport need on a limited scale and which uses new equipment and alignments. These are frequently known as 'minor' railways in other jurisdictions. Any railway using steam traction should be considered to have at least an element of "heritage" involved so far as the steam operation is concerned, as the necessary skills are not in everyday use in non-heritage operations.

The Railway Safety Commission (RSC) regulates railways of 350mm (15inch) gauge or over and other systems with similar properties such as monorails at its own discretion.

The characteristics of these railways are generally:

- Network is not connected to other systems,
- Train operation and infrastructure managed together by one entity,
- Line speed is below 40km/h (25mph),
- No or Limited signalling system.

Heritage and minor railways frequently utilise volunteer, unpaid or employment scheme labour and may operate only seasonally. Where the term 'staff' is used in this document, it refers to paid and unpaid labour.

## 2 Safety Management

The adequate implementation of a Safety Management System (SMS) by all Heritage Railway Operators is a key element for success for the safety regulatory framework as foreseen by the EU Railway Safety Directive, since it forms the basis on which the RSC issue safety certificates and safety authorisations.

The overall purpose of the SMS is to ensure that the railway achieves its objectives in a safe manner. These objectives need to be fulfilled in today's ever changing and complex railway environment, giving evidence that the organisation complies with all of the safety obligations that apply to it.

Safety conscious organisations thereby recognise that an efficient control of its risks can be achieved through a process that brings together three critical components:

- a technical component with the tools and equipment that are used,
- a human component of front line staff with their skills, training and motivation, and,
- an organisational component consisting of procedures and methods defining the work methods and tasks.

Consequently, a good SMS succeeds in monitoring and improving the risk control measures in the three components.

This generic high level guidance is intended to support, through practical advice and suggestions, the design, implementation and delivery of a structured and organisation wide railway SMS. The overall aim is to provide a tool for the ease of use by Heritage railway companies and, at the same time, for facilitating compliance with the requirements set up in the Railway Safety Directive. This guidance is intended to be read in conjunction with the Railway Safety Directive and with all applicable railway and health & safety related legislation.

The bare essentials of a SMS are likely to consist of:

- A statement of commitment from the board of directors (or equivalent body), and the appointment of a person responsible for safety. A family tree with lines of responsibility. (Annex III(2)(a))
- A comprehensive risk assessment of all activities the railway undertakes, updated every time a new activity is contemplated or other change occurs. (Article 9(2))
- A rule book or work instructions, written in an understandable manner, which is available to all staff who might have need to apply the instructions or rules. (Annex III(2)(g))
- Competence management systems in respect of safety critical staff (Drivers, guards, signalmen, vehicle, track and signalling equipment maintainers). To include training, examination and suitable standards to be achieved. (Annex III(2)(e))
- Fitness requirements, standards and qualifications for safety critical staff, to include limits on working hours, medical fitness and a drugs and alcohol policy. (Annex III(2)(e))
- Maintenance standards, instructions and recorded inspections for all vehicles, track, signalling equipment and structures from which risk could reasonably arise. Similarly, buildings, boundary fences, fixed ladders and any other hazardous installation need to be monitored at appropriate intervals and prevented from falling into an unsafe condition. (Annex III(2)(c))
- Documented occupational Health and Safety practices to include, for example, hazardous materials, competence with machinery, electrical safety, PPE, etc. (General Health & Safety Legislation).
- Emergency plans, contacts list, track access points with maps for emergency services. (Annex III(2)(i)). First aid provision, including qualified staff, should be not less than the statutory minimum.
- Control of contractors and suppliers. Contractors should provide safe railway equipment and materials as though they were an internal part of the railway, and be provided with adequate contract specifications. Line side contractors must be kept safe from moving rail vehicles etc.

- Crowd control. The flow and number of passengers, visitors and groups should be managed safely. (Article 9(3))
- The SMS must be accessible to all who may have need to access it, and widespread knowledge of it internally to the organisation should be encouraged. (Annex III(1))
- Internal audit. Internal audits, carried out by the Railway aims at assuring that the SMS is implemented and will continue to be delivered effectively. Railways operating for some time have already in place arrangements to deliver safe operation. They have, nonetheless, to demonstrate the implementation of a SMS that conforms with requirements. (Annex III(j))

### **3 The Infrastructure**

What you own and operate in terms of infrastructure needs to be established first, before it can be effectively managed, and therefore the first step is the compilation of an asset register. Asset management is the systematic and co-ordinated activities and practices undertaken by a company to manage assets that are a key or critical factor in achieving effective service delivery and their associated risks in an effective manner to achieve its objectives safely. Additionally, any asset which is owned or leased but not an essential part of service delivery will also carry legal safety liabilities.

Successful asset management involves identification of the assets owned or managed by a company, such as, physical assets; e.g. buildings, networks, infrastructures, equipment, electrical installations, etc.

#### **3.1 Managing Infrastructure Risk**

Each railway must ensure that it is able to maintain its infrastructure so that safety is not compromised. This relies upon planned regular inspection and maintenance. Infrastructure issues are not purely confined to track and signalling, as drainage, vegetation and built structures all need to be considered.

Within the railway's SMS, it should be stated how often the different elements of the infrastructure are inspected and where the findings of these inspections are kept. Specialist expertise may need to be brought in from outside, for example the inspection of bridges is likely to require civil engineering knowledge.

For major and complex structures such as multi-span bridges, viaducts and tunnels, the RSC would expect detailed inspection plans and a maintenance regime to be drawn up for that particular structure.

Fire safety should be considered, in particular in respect of safe evacuation of people, minimisation of spread, and avoidance of risk to emergency services personnel.

#### **3.2 Structures**

All the structures on the railway should, as part of the SMS, be identified and listed. This list should include all over bridges, under bridges, culverts, platforms and buildings over the railway or close to the railway (within 6ft 6in / 2m or spanning the railway).

All the structures should then be incorporated into an inspection regime. A particular issue for heritage railways is the age of infrastructure. Built structures such as bridges, culverts and platforms may be in excess of 100 years old and thus may need closer and more detailed examination than may have been undertaken in the past, particularly where steelworks and concrete are concerned. Steel work corrosion and exposure of reinforcing rods in concrete should be addressed quickly to prevent repair work becoming more expensive.

Consider also the parts of any structure which cannot be easily seen, such as the areas below a water line etc. Appropriate measures should be taken to prevent erosion of embankments, cutting slopes and the track formation during strong water flows. Particular attention should be paid to susceptible locations such as bridges over cuttings and transitions between cuttings and embankments.

#### **3.3 Track**

The permanent way should be designed, installed and maintained to written standards suitable for the axle loads, tonnage and speeds of the traffic it has to carry. Sleepers should be located securely in good ballast to prevent movement and avoid strained or dipped rail joints.

Track should be inspected regularly to look for deterioration in alignment, loose and broken fittings and fixings.

Emerging maintenance related issues can include:

- Rotten sleepers
- Corroded rail foot,

- Insecure rail to sleeper fixings,
- Inadequate levels of ballast,
- Loose fitting or seized fishplates, including wear of the rubbing surfaces of fishplate and rail,
- Loss of lateral and vertical alignment,
- Excessive or inadequate gaps between rails leading to expansion / contraction related distortion,
- Flooding and other water logging.

One role should be designated as responsible for the track, infrastructure and ensuring inspections are recorded, and that actions are taken when defects are found. There will always be a need for planned maintenance tasks such as weed killing, fishplate oiling and tightening of fixings.

A particular issue for Heritage railways is the re-use of salvaged track materials. It should not be forgotten that many of these materials have been replaced as being near life expired or have been removed after not having received maintenance for long periods of time. Timber sleepers in particular are vulnerable to water ingress in previous spike and screw holes, whilst rail should be checked for wear to the head and corrosion to the web and base. Gas cut ends and holes should be eliminated from all new construction and progressively from existing railways, as they can be a source of cracks.

Mixing and matching of different designs can also be an issue, and how the different rail types are connected and interface with each other. Ideally the correct transition fishplates should be used, but if not available, then the arrangements should be designed by an engineer of adequate competence, taking due cognisance of the loads involved and material properties.

### **3.4 Facing Points**

Unless point blades are fully closed against the stock rail, there is a risk of derailment. Facing point locks should normally be provided on all points which are facing to passenger traffic on passenger lines with a track gauge of 15 in (381 mm) or greater. Facing points on a passenger carrying running line of a railway should be kept to a minimum. Locked (or otherwise secured from interference) clamps of an approved design are an acceptable alternative to lever operated facing point locks, and in the case of smaller, lighter equipment where speeds are reduced to walking pace, and the risk is otherwise assessed as particularly low, weighted levers with shadow boards may be used. Facing point locks, clamps etc. must be lockable by a key, staff or token which is retained by the driver of the train, and the same system or locked scotches should be employed to prevent unauthorised additional vehicles from entering onto the token section. Where facing point locks operated by a lever are used, the adjustment should be such that the lever cannot be fully pushed home (and hence the key removed) if the blades are open to any significant extent, well short of the distance which could present a risk of derailment.

Some existing railways use spring-loaded points or weighted levers at run-round and passing loops. They enable the train to run into a station, the locomotive to be detached and run round the train, without the need for staff to be available to switch the points. Where the points are used by passenger trains (as opposed to being for engine release only) there should be a means of clearly establishing that the point blade is fully closed, e.g. by providing target discs behind the weighted levers, so that drivers can see more easily that the weights, and therefore the blades, are fully home. The same should apply where passenger lines diverge.

### **3.5 Level Crossings**

Level crossings can present a major source of risk to railway operations. Any new level crossings used by the public (including foot crossings) shall need to be approved by the RSC. Where roads are involved, the local authority or road authority may be required to be consulted and give approval. The RSC Guideline RSC-G-006B gives further detail on the safety provisions required at level crossings.

### **3.6 Stations**

The public areas of stations should allow the free movement of passengers. Platforms, passageways and stairways etc should be suitable, for the foreseeable peak passenger usage with due allowance for operational difficulties in emergency conditions.

Allowance should be made for the surge of passengers arriving by trains and for the presence and movement of passengers accompanied by children and for those with reduced mobility.

During operating hours all station premises to which passengers or staff have access during the hours of darkness should be adequately lit.

### **3.7 RSC approval of infrastructure**

New works, as defined in section 42(15) of the Railway safety Act 2005, requires RSC approval through a 'New Works Assessment'. Contact should be made at the planning stage so that RSC can identify any issues and provide guidance. Once a detailed design has been produced, this should be submitted to the RSC for review. Once the RSC is satisfied it will issue a 'Letter of Acceptance' meaning construction can commence. Similarly, an RSC Inspector will undertake an inspection of the works prior to them being commissioned. Refer to RSC Guideline RSC-G-009B for further details on the approval process.

Where an existing structure or piece of infrastructure is being renewed (i.e. replaced like for like) without any change to design or materials, RSC approval is not required.



## **4 Rolling stock**

What you own and operate in terms of rolling stock needs to be established first, before it can be effectively managed. As stated previously, asset management is the systematic and co-ordinated activities and practices undertaken by a company to manage assets that are a key or critical factor in achieving effective service delivery and their associated risks in an optimum manner to achieve its objectives safely.

Successful asset management involves identification of the assets owned or managed by a company, such as, own operational rolling stock, hired in or borrowed rolling stock and new or restored rolling stock under development. It should be noted that the railway company is responsible for the safety of the public and staff in relation to all assets within its boundaries, whether operational or otherwise, to the extent applicable. The railway should require the owners of all such assets to comply with its own SMS.

### **4.1 Managing Engineering risk**

#### **4.1.1 Heritage vehicle risks**

Heritage rolling stock often has special needs and requirements originating from the age of the equipment, infrequent use and modification over time. Locomotives and stock should be thoroughly examined at regular intervals. Provision should be made for inspection from underneath via a pit or section of elevated track by maintenance staff.

Planned maintenance should be programmed which should include thorough inspection and lubrication and testing. This may require partial dismantling, such as lifting vehicles off their bogies to access parts and components which cannot be reached otherwise.

A log or register, providing a maintenance history for each vehicle should be maintained of all the work and maintenance undertaken to the rolling stock.

Operating staff should be trained to inspect obvious safety critical mechanical components such as springs, couplings, tyres and brake blocks / pads before entering into service. Staff should also perform a functional test of the brakes, warning devices and communications before vehicles enter into service each day. These examinations should be recorded on a series of "Fitness To Run" (FTR) forms, signed by the examiner, and, where applicable, countersigned by the Responsible Officer. FTR forms should be specific to vehicle type, and include all safety related tasks (and any others the railway chooses to add in respect of service reliability) which are applicable to that type of vehicle, even if some specific vehicles within the classification do not have all the equipment listed. One example would be in relation to a Diesel mechanical locomotive, where the task "Check and top up compressor oil level" may be listed. Some locos may have compressors which have lubricating oil pressure fed from and returned to the engine, in which case, the examiner would enter N/A rather than his initials. It is strongly recommended that each task should be initialled rather than just ticked, as different individuals may be involved in examining different parts. Only the job titles need be listed on the FTR check sheets, but a full job description should be readily available, e.g. posted on the shed notice board.

#### **4.1.2 Locomotive boilers**

Locomotive boilers present specific risks and require expert and independent assessment by qualified individuals, with railway specific knowledge. This is also generally a requirement of insurance companies, to guard against boiler explosion events.

Each boiler must have two independent means of testing the water level and two independent means of putting water into the boiler under steam (e.g. injector, crosshead driven pump, feed pump). Any locomotive not meeting this requirement shall be withdrawn from service immediately.

As part of the FTR of steam locomotives, there should be a test of both injectors at the minimum pressure at which they will work, and also at blowing off pressure. The first safety valve (at least) must have its opening pressure

checked against the red line on the pressure gauge before any steam locomotive leaves the preparation area each day.

The RSC expects all locomotive owners to be able to produce evidence of inspections and insurance for each operable steam locomotive.

A single role should be designated as being responsible for boiler maintenance and upkeep. Records of inspections and washouts should also be maintained. In addition to the statutory / insurance inspections, the railway company should appoint its own internal boiler examiner(s) to take responsibility for undertaking examinations each time the boiler is washed out (if more frequent than annually), and certifying that it has been correctly washed out, in safe condition to permit continuing use, and correctly re-assembled upon completion. Washouts must be frequent enough to ensure that there is no excessive build up of scale. Day to day repairs such as fullering seams, tightening tubes, riveting stays, recutting tapered threaded holes for plugs etc. must be recorded on a sketch drawing of the boiler.

Boilers must be repaired only by individuals trained and competent to do so. All structural repairs must be designed in conjunction with the insurance company's boiler engineers. Any welding at all must be undertaken only with approval of and in accordance with the specification laid down per occasion by the boiler insurer's engineer.

It is strongly recommended that water treatment is used and monitored in order to minimise scale formation and corrosion.

The method of disposal of a steam boiler at the end of each day can have a considerable influence upon its life and hence safety.

Fusible plugs should be renewed frequently enough to avoid risks due to fire and water side corrosion. They should be given particular attention to confirm absence of leakage during the pre-light up checks. They must NEVER be replaced with plain plugs under ANY circumstances.

## **4.2 RSC approval of rolling stock**

The RSC will approach each heritage and tourist vehicle on a case by case basis, so it is imperative that the Railway or rolling stock owners notify the RSC of new rolling stock proposed to be placed in service in writing. Failure to do so could constitute a breach of the Railway Safety Act 2005 and result in action being taken by the RSC.

The RSC will then advise, if appropriate, on what information should be supplied (a "technical file") and what level of assessment will be required.

### **4.2.1 Existing vehicles**

Where the use of a vehicle is to be changed from that for which it was built or was intended to be used as its primary purpose, then some level of a NRSA is likely to be required. E.g. The conversion of a freight wagon to a passenger carrying vehicle.

Where component changes or replacement are made as part of maintenance activities, these will not be subject to assessment by the RSC. However, if component change is not 'like for like', the RSC should be notified in writing to consider what level of assessment may be required.

Examples where this may apply include:

- Fitment of a new bogie type not used on the vehicle previously,
- Installation of generators and powered equipment other than lighting,
- Change of braking system.

Where minor changes are made to vehicles with the intention of improving safety or where a material is no longer available and the main structure of the vehicle will be substantially unaffected, a NRSA will not be required. It is the responsibility of the railway themselves to consider the impact of any change on safety and reliability and ensure this is managed.

#### **4.2.2 New vehicles**

New vehicles built to existing historical designs (replicas) will be classified as new vehicles, but subject to satisfactory dialogue, may incorporate features not in line with current engineering practice provided these vehicles are intended for only heritage and touristic purposes and are at least equal to the original design in safety performance. The railway should produce a full and sufficient submission in justification.

Vehicles built to completely new designs shall require a NRSA, although for vehicles for exclusively tourist and heritage use, the intended use, traffic levels and experience of the manufacturer with similar equipment will be taken into account. The railway should produce a full and sufficient submission in justification.

Where there is any doubt as to whether a Safety Assessment is required, advice should be sought from the RSC.

## **5 Operations**

### **5.1 Managing Operating staff**

#### **5.1.1 Training & Competence**

All staff must be adequately trained before undertaking duties on which the safety of the public is dependent. The roles that are identified as safety critical should be detailed in the SMS.

For every member of staff for which a specific competence is required, a record must be kept of when they became competent and who deemed them competent. Depending on the risks and size of operation, the RSC may also expect to see further detail on what arrangements exist for making sure staff competence is maintained and how they are assessed.

A competence management system should include:

- The identification of posts that have responsibilities for performing operational and maintenance processes or tasks and include in the SMS, together with those posts that perform safety tasks;
- The identification of knowledge, skills and experience required to perform these processes or tasks;
- The selection principles (required basic educational level, attitude and physical fitness);
- Details of how the training is undertaken;
- The certification of acquired competence and skills;
- The necessary measures to manage the competence of staff;
- The ongoing training and periodical update of existing knowledge and skill, to ensure that staff remain competent for performing the assigned tasks;
- Monitoring of staff performance, as required;
- Specific measures in case of long absence from work (such as seasonal shut down), as required.

It is also important that the competence management system ensures that all staff are aware of the relevance and importance of their activities and how they contribute to the achievement of the safety objectives.

In addition Senior management / top team and, in general, supervisory roles should be trained in understanding their safety responsibilities.

#### **5.1.2 Medical Requirements**

For roles such as train driving, each railway should define in its SMS any medical requirements.

Particular conditions that should be of interest include:

- Any illness causing fainting or dizziness,
- Any visual acuity impairment,
- Colour blindness, (although this need not necessarily be a bar to driving in daylight hours if no colour signals are required to be “read”).
- Any audio / hearing impairment,
- Any mobility impairment.
- Any medication, prescribed or otherwise, which may cause a changed state of awareness, impaired reactions or judgement.

Any of the conditions above should be considered against the safety critical role undertaken and either a prohibition on undertaking the role or special measures such as being accompanied should be applied.

### **5.1.3 Record Keeping**

It is recommended that a file is held in a secure location for each member of staff. This should contain:

- Training records,
- Medical records,
- Incident records,

In addition to above, a visual competency matrix should be available showing who is able to carry out which tasks. This should only be updated by a nominated person.

Each day a member of staff is at work, they should sign on and off for duty. This signing on and off should be to record the presence of staff on duty, show that they have read any required notices, have any equipment that they are required to have and that they are fit for duty.

## **5.2 Mode of Operation**

### **5.2.1 Train Movements and Signalling**

Each railway must identify a safe method of operation and agree this with the RSC.

‘Line of sight’ operation is generally not permitted by the RSC on bi-directional railways.

Where no signalling or system of control is installed, the method of normal operation shall be by default ‘One Train Working’. This permits only one train to be present and moving on the passenger running line. All points must be secured so that no other trains can access the running line and the keys attached to a ‘staff’ carried on the train operating the service.

The model arrangement for securing facing points where no signalling system is installed is a ground frame released by the staff with a facing point lock

In order to permit more than one train to be present on a running line additional systems and procedures must be introduced. These must be risk assessed, documented, defined and understood by all involved.

If more complex signalling is required to enable multiple trains to operate this must be approved by the RSC and take account of guidance contained in RSC-G-005B.

### **5.2.2 Train braking provision**

Passenger trains must be equipped with a fully functional braking system that:

- operates on every vehicle in the train
- automatically applies in the event of a train division
- Can be applied by the guard, or the alarm raised by a passenger in the event of an emergency.

Any exception to this is only by permission of the RSC and subject to suitable additional mitigation measures being introduced.

### **5.2.3 Rulebook**

To help ensure safety, each railway should formulate rules for operating staff to follow. As a minimum these should cover the following key areas:

- Communication and any hand, flag and audible signals used,
- The method of train operation,
- The meaning of any lineside signals or signs,
- Staff fitness for duty requirements,

- Mandatory checks on rolling stock by operations staff before entering service on a daily basis,
- Reporting defects and the actions to be taken on finding defects,
- Define the authority and decision making hierarchy,
- Actions to be taken in an emergency.
- Staff behaviour.
- A statement that the rules have been adopted by the board of management.
- Document control (author, issue no, date etc.)

#### **5.2.4 Communications**

Where a railway intends to use mobile phones as part of its communication system, careful consideration should be given to the risks that may arise from the use of such phones during operation and the quality and extent of coverage for the railway system.

Where correct and accurate communication is an essential part of the safe method of working it is important that all parties reach a clear understanding, particularly when the communication takes place over the phone or radio. Following clear and standardised communication protocols, such as the phonetic alphabet and standard terms, should assist all parties. It should always be clear to each person who exactly they are talking to and where the other person is.

#### **5.3 Managing the public**

Areas where there are hazards such as open inspection pits and engineering activity should be fenced off or covered to prevent access to the area by public.

Staff in charge of operating trains should be aware of the maximum safe carrying capacity of rolling stock. Standing passengers should only be accommodated if there are sufficient handrails, space and there is sufficient restraint to prevent people falling from the vehicles.

# Appendices

## **Appendix A SMS Contents**

This list of contents is not definitive but is provided as a guide only for Heritage Railway operations. The management of the railway, as duty holder has the responsibility for ensuring that all the appropriate activities, operations and risk controls are included within the scope of the SMS.

### **A.1 Brief Description of the Railway**

- The location of the railway, where it is, including a map or sketch of the layout,
- Who owns the railway, a company, society, local authority, private owner etc,
- Who operates the railway, the name of the organisation including the relationship with the owner, if applicable,
- The main characteristics of the railway and operation, such as length, gauge, major structures, number and types of trains etc.

### **A.2 Safety Policy**

- A copy of the Safety Policy Statement from the senior manager, or a reference to where it can be found.

### **A.3 Organisation**

- A brief description of the organisation, including the key safety roles and responsibilities,
- This may be best described within an organisation chart,
- Identify the key competent persons for operations & safety and also engineering & maintenance.

### **A.4 Risk Assessment**

- Details of the risk assessment process,
- Including;
  - Scope of the assessments,
  - How new risks are identified,
  - The review process,
- Reference to where the risk assessment can be found.

### **A.5 Management of Competence**

- Identification of safety critical tasks,
- How training is carried out,
- How competence is assessed, maintained and monitored,
- Staff fitness requirements,
- Refer to any company standards or procedures used.



## **A.6 How is the Railway Managed**

- How does it operate normally,
- Details of any special events,
- Outline of work instructions, rule book etc,
- How information is disseminated, notice boards, briefing etc,

## **A.7 How is Maintenance Managed**

- Reference to the railways asset register,
- How is maintenance and inspection of the following carried out;
  - Track formation,
  - Structures,
  - Signalling,
  - Rolling stock,
- What maintenance standards are applied,
- What maintenance instructions are provided and what records are kept,
- Details of the maintenance facilities.

## **A.8 How are changes to the asset base handled**

- Loaned or hired in rolling stock,
- Visiting locomotives etc,
- Changes to infrastructure.

## **A.9 How are other people on the premises controlled**

- Visiting groups (locomotive owners etc),
- School visits (where applicable),
- Contractors on site.

## **A.10 How are emergencies handled**

- Roles and responsibilities,
- Emergency Plans, contacts, exercises,
- Degraded operations (including weather related),

## **A.11 Accident & Incident Reporting**

- How is it done and by who,
- Reporting, investigation, actions and closure,
- Internal and external (AIB, RSC).

### **A.12 Staff Involvement**

- Both paid and un-paid,
- Consultation on;
  - Risk assessments,
  - Methods of work,
  - Safety targets etc,

### **A.13 Provision for recurrent internal auditing of the SMS**

- Ongoing internal (or “self”) audit on the assessment criteria established for the delivery and supervision of SMS by the RSC,
- Independence, how is it done and by who,
- Frequency, how often do you do it,

### **A.14 How is the SMS reviewed**

- Frequency of review and by who,