

## هيئة الطرق والمواصلات

### دليل جهة تنظيم السلامة – وفق القرار الإداري رقم 986 لعام 2018

#### متطلبات تنفيذ قرار المجلس التنفيذي رقم (1) لسنة 2017 بشأن تنظيم السكك الحديدية في إمارة دبي

يشرح هذا الدليل متطلبات جهة تنظيم السلامة لتنفيذ القرار التنفيذي رقم (1) لسنة 2017 بشأن تنظيم السكك الحديدية في إمارة دبي شاملة إجراءات شهادات السلامة لأنظمة السكك الحديدية ومشغليها وإجراءات التحقيق الفني في الحوادث.

ينطبق هذا الدليل على أي طرف يعتزم تصميم أو إنشاء أو اختبار أو تشغيل أو تقييم أو امتلاك أو صيانة نظام سكك حديدية في إمارة دبي.

يتضمن هذا الدليل على وجه الخصوص ما يلي:

- منهجية ومتطلبات ترخيص السلامة لأنظمة السكك الحديدية.
- منهجية ومتطلبات تنظيم السلامة لأنظمة السكك الحديدية.
- منهجية ومتطلبات الإبلاغ والتحقيق في حوادث السكك الحديدية.
- قواعد التفتيش وتطبيق المخالفات.

كما يشمل الدليل على عدة مرفقات كما يلي:

- نموذج نصح إدارة المخاطر المتبع من قبل جهة تنظيم السلامة.
- قواعد الممارسة لمُقيمي السلامة المستقلين ومتطلبات الحصول على تصريح مُقيم السلامة المستقل من قبل جهة تنظيم السلامة.

# Risk Management Maturity Assessment Criteria

Annex to

RTA Safety Regulation Authority

Dubai Railway Law Implementation  
Requirements

(Safety Regulatory Entity Manual in accordance with Administrative Resolution  
986/2018)

Version: 3.0

Prepared by: Safety, Risk, Regulation and Planning Department  
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## Change History

Version	Date	Status	Writer
1.0	30 <sup>th</sup> May 2017	Initial Issue.	Robin Smith
2.0	25 <sup>th</sup> Sep 2019	Minor amendments to align with DRLIR.	Rigby Wason
3.0	28 <sup>th</sup> Dec 2021	Full review of document following ORR issue of RM3 (2019).	Rigby Wason

## 1. Introduction

The Dubai Roads and Transport Authority (RTA) Safety Regulation Authority (SRA) document: ‘*Dubai Railway Law, Implementation Requirements*’ describes the legal basis and the overall approach that the SRA adopts to undertake Certification and Regulation, including Technical Accident Investigation, of Railways in the Emirate of Dubai.

This document is an Annex to the *Dubai Railway Law, Implementation Requirements* and sets out criteria that the SRA uses to assess a Dubai Railway system organisation’s ability to achieve excellence when controlling Health and Safety (H&S) risks. Railway Duty Holders and Contractors who are operating trains are described as ‘Organisations’ in this document.

The European Foundation for Quality Management (EFQM) [1] describes truly excellent organisations as those which:

**‘Strive to satisfy their stakeholders by what they achieve, how they achieve it and what they are likely to achieve’.**

Excellence is not a theory – it relates to the real achievements of an Organisation in what it does, how it does it, the results it gets and the confidence that these results will continue and improve into the future.

An excellent Organisation may also meet its legal requirements in an efficient way – it considers the benefits to the Organisation as a whole and actively looks for further improvements in controlling risk.

Excellent Organisations will show similar features. Some of these features are found in published Safety Management System (SMS) guidance [2 & 3].

This Annex, and its RM3 Assessment criteria, is based on the United Kingdom (UK) Office of Rail and Road (ORR) document ‘RM3 2019 The Risk Management Maturity Model’<sup>1</sup> – [4].

RM3 assesses an Organisation’s ability to manage and improve Health and Safety risk successfully.

The SRA RM3 Guidance incorporates key features of good practice for Health and Safety Management Systems. The general process is shown in Figure 1.

It is intended that RM3 Assessments be undertaken by both the SRA and the Dubai Railway Systems’ Organisations, i.e. Owners, Operators, Maintainers and certain Contractors.

**The 2021 Annex supersedes the previous 2019 Annex and contains additional descriptors for each RM3 Performance Sector Criterion with a strengthened section for assessing an Organisation’s Culture.**

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Figure 1-1 – The 'Good Practice' Process for Health and Safety Management

The SRA has adopted the RM3 process, including the defined five (5) Organisation H&S Performance Sectors, twenty-six (26) Sector Criteria with the five (5) associated Maturity Levels. These have been subjected to minor changes from the source ORR document to reflect the laws and particular characteristics of the railway systems in Dubai.

## **2. Excellence in Safety Management Systems**

The SRA's objective is for Dubai Railway Organisations to achieve excellence in risk control.

An Organisation can only achieve this through effective management. The following descriptions have been set for each of the five (5) main H&S Performance Sectors of an effective management system.

### **Sector 1 - H&S Policy Leadership and Board Governance**

- An Organisation's policies are visionary, based on solid evidence of what the Organisation can achieve, and should promote a consistent approach to H&S at all levels within the Organisation.
- Leaders within each Organisation set and communicate clear direction that reinforces a consistent approach to H&S and shapes the day-to-day activities and strives to continuously improve risk control.
- An Organisation's leaders at all levels, act in a consistent way that reinforces the values, ethics, and culture, needed to meet the Organisation's objectives.
- The leadership style throughout the Organisation should be transformational instead of transactional. That is, more accepting of moving forward and change.

### **Sector 2 - Organising for Control and Communication**

- The Organisation is structured to help put its policies into practice as efficiently as possible.
- There is a clear understanding of how each person's role affects an Organisation's ability to achieve specific goals and overall objectives.
- The Organisation provides the framework for successfully using people, plant, equipment, and processes.
- Communications throughout the Organisation, are highly effective.
- Communications from management should be appropriate for the target audience. The right message should be received at the right time, by the right people, and through the appropriate channels.

### **Sector 3 - Securing the Co-operation and Competence of Employees at all Levels**

- Competences (knowledge, skills, experience, and abilities) needed to work effectively, efficiently and safely are understood by the Organisation, with the right number of people, in the right place, at the right time, with the right competence.

- Recruitment, selection, training, and continued development focus on meeting the Organisation’s objectives.
- Employees are actively involved in developing processes and making the business successful and safe.

#### **Sector 4 – Planning and Implementation of Risk Controls Through Co-ordinated Management Arrangements**

- Organisations systematically implement processes to make sure that the plant, equipment, people, and processes are used fully, continually improving effectiveness, efficiency and safety to achieve the Organisation’s objectives.

#### **Sector 5 – Monitoring, Reviewing and Auditing to Provide Effective Governance, Management and Supervision**

- Monitoring, at all levels of management, is an important part of the Organisation’s management arrangements.
- Performance measures and audit programmes, are used to continually encourage everyone to achieve the Organisation’s objectives and reduce risk to the business.
- Detrimental variations from expected outcomes are reviewed to understand where the Organisation is failing and what corrective action is necessary to restore and improve performance.
- The Organisation actively seeks opportunities to identify best practice from both within the Organisation and from others.

The above five (5) Performance Sectors and the associated twenty-six (26) Performance Criteria are shown in Figure 2.



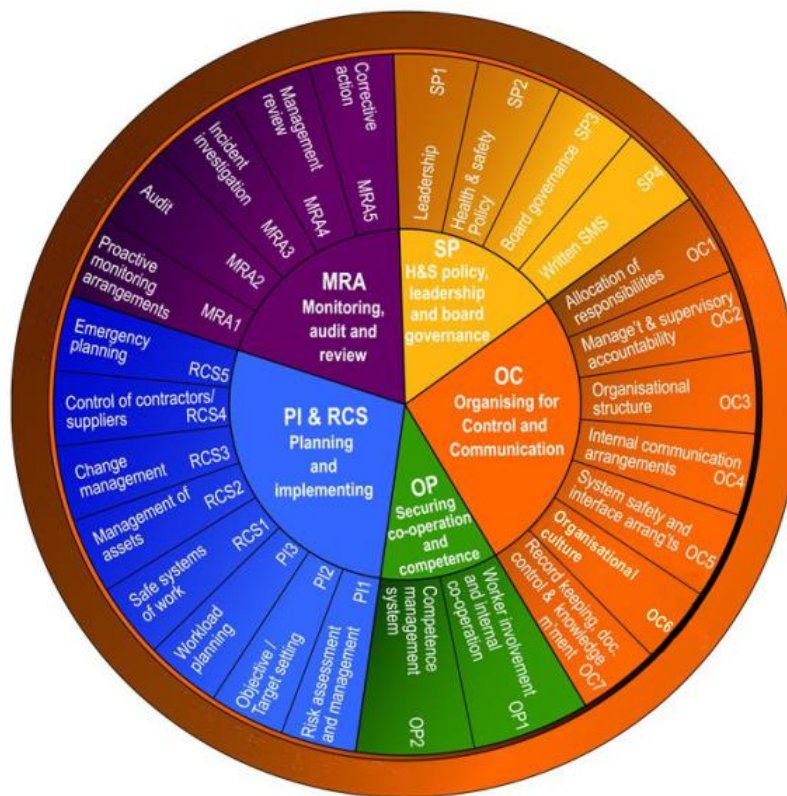


Figure 2-1 – SRA – RM3 Five Performance Sectors and Associated Twenty-six Sector Criteria

For each RM3 Sector Criteria, five (5) Maturity Levels have also been identified. The Maturity Levels ranging from Excellence down through to Ad-hoc, are shown in Figure 3. Detailed descriptions of the Maturity Level requirements are shown in Section 4.



Figure 2-2 – RM3 Criteria – Maturity levels

### 3. Guidance on Implementing the RM3 Model

#### RM3 Criteria - Maturity Level Generic Descriptions

The table below gives a basic description for each of the five (5) Criteria Maturity Levels.

##### Excellence

It is characteristic of processes at this level that the focus is on continually improving process performance through both incremental and innovative technological changes/improvements.

##### Predictable

It is characteristic of processes at this level that, using process metrics, management can effectively control the AS-IS process (An “as is” business process defines the current state of the business process in an Organisation). In particular, management can identify ways to adjust and adapt the process to particular projects without measurable losses of quality or deviations from specifications. Process capability is established from this level.

##### Standardised

It is a characteristic of processes at this level that there are sets of defined and documented standard processes established and subject to some degree of improvement over time. These standard processes are in place (i.e. the AS-IS processes) and used to establish consistency of process performance across the Organisation.

##### Managed

It is characteristic of processes at this level that some processes are repeatable, possibly with consistent results. Process discipline is unlikely to be rigorous, but where it exists, it may help to ensure that existing processes are maintained during times of stress.

##### Ad-hoc

It is characteristic of processes at this level that they are (typically) undocumented and in a state of dynamic change, tending to be driven in an ad-hoc, uncontrolled and reactive manner by users or events. This provides a chaotic or unstable environment for the processes.

## Collecting the Evidence

Information on the performance of organisations can be gathered in a variety of ways: through interviewing individuals at various levels, through inspecting and reviewing documentary evidence and through direct or indirect observation of conditions found at site level. Evidence can also be obtained reactively from incidents, workplace violations and errors, failure to meet targets and complaints.

Figure 3-1 illustrates the type of information and the collection methods available to inspectors in determining an organisation's maturity levels.

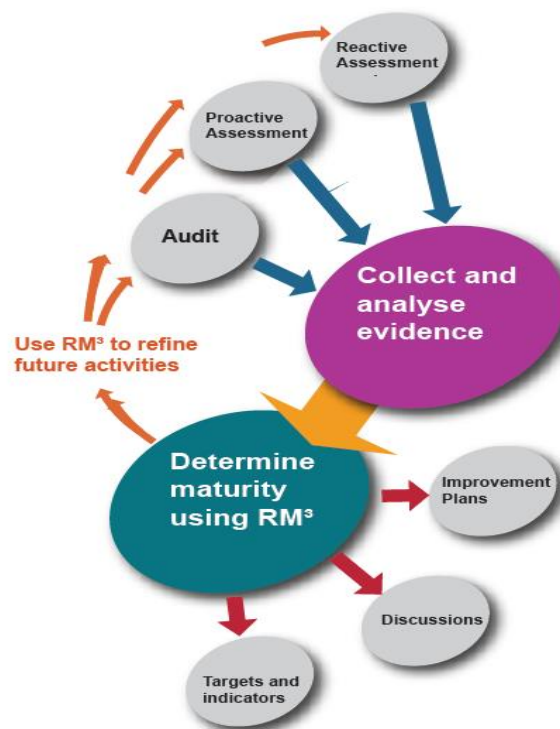


Figure 3-1 – Information Sources

Inspectors should use their judgement when deciding which criteria and evidence to use. The following issues should be considered:



Figure 3-2 – Evidence Factors

## Evidence should meet the criteria shown in Figure 5 and expanded on below:

- **Consistency of the evidence** – if the evidence from a number of sources suggests a similar level of maturity, this would indicate that the assessment findings are accurate.
- **Quantity of the evidence** – whether there is enough evidence to provide an informed opinion on the Organisation as a whole. For example, if evidence on document control for a small depot revealed an ‘ad-hoc’ level of achievement, is that sufficient to form an opinion on the document control system for thirty other, much larger depots?
- **Quality of the evidence** – whether the evidence is based on a limited observation from one site or is consistent across a number of sites.
- **Currency of the information** – when the evidence was initially gathered and whether there are likely to have been any significant changes since then.

### Collating Findings

When collating findings, RM3 inspectors should critically review their evidence against the evidence factors and identify maturity levels based on the modal average for each RM3 Criterion.

Evidence collected during inspections and investigations should be compared against the descriptions of each Maturity Level and a judgement made of the H&S management capability of the Organisation. This will enable the Organisation to understand its strengths and target areas for improvement. Evidence could be grouped for a work section, a department, directorate, site, or organisation.

Organisations should then never try to roll all maturity assessments together to arrive at an overall maturity level. The value of RM3 is in the discussions to be had around the findings for each of the 26 Criteria. In terms of risk management, determining how the SMS works in practice is generally more important than how it appears on paper. The inspection should also focus on the day-to-day application of the SMS.

Using the RM3 model, it is possible to identify the gap between the **‘work as imagined’** of the written health and safety management system (SMS) and the **‘work as done’** actions taken at the sharp end; the **‘here and now’** of task performance.

## 4. RM3 Inspection - Criteria Requirements

For clarity each of the Performance Sectors and their associated Performance Criteria have been colour coded to reflect the Sector/Criteria wheel shown in Figure 2.

Note that within each of the RM3 Performance Sector Criteria descriptions, an orange OC6 Culture box is embedded. This will act as a prompt to the RM3 Inspector to determine cultural aspects for each Sector Criteria, thus enabling the OC6 Culture assessment to be more readily determined.

### SP - HEALTH AND SAFETY POLICY, LEADERSHIP AND BOARD GOVERNANCE

#### Purpose

- To make sure that the Organisation is effectively governed and led.
- To make sure that each policy clearly expresses the top-level management expectation, accurately defining what the Organisation wants to achieve, how it will achieve it (through effective leadership) and how management will know when that expectation has been met.
- To make sure that the Organisation (specifically the board) effectively challenges whether a policy and its associated activity is correct, in place and effective.

#### Introductory Notes

- The Organisation's policies are forward-thinking and based on solid evidence of what it can achieve. Together with effective leadership, the policies promote a consistent approach to H&S at all levels of the Organisation.
- Leaders of the Organisation set and communicate a clear direction for the Organisation that reinforces a consistent approach to H&S.
- Leaders at all levels of the Organisation act in a consistent way to reinforce the values, ethics and culture needed to meet the Organisation's objectives.
- The governance arrangements make sure that the Organisation remains accountable for the H&S of its workers, passengers and members of the public affected by their work.
- A failure to consider H&S risks when the board makes decisions can have catastrophic results. An Organisation's approach to H&S inevitably reflects the attitudes of those who make business decisions, and it leads the opinions and attitudes of the staff who work within the Organisation.

## SP1 – LEADERSHIP

### Introductory Notes

Leadership from the top, provides a consistent example and inspiration for leaders at all levels of the Organisation. Good leadership in H&S management involves:

- The attitudes and decisions of senior managers aligning with the H&S policy and culture.
- Identifying and promoting the styles of leadership and management practices at all levels, which best support a positive H&S culture.
- Promoting effective collaboration and engagement of all workers and business partners to achieve continuous improvement on H&S.
- Aligning the leaders in operational management, organisational functions and operational and support units in pursuit of the common H&S purpose, strategies and goals.
- Assessing H&S leadership and management behaviour to motivate and reward success, in improving the control of risk.
- Adjusting the performance-management and reward systems, so they help the Organisation achieve its goals and strategies for improving health, safety and performance.

### Excellence

- Leaders at all levels of the Organisation demonstrate shared values which strive towards continuous improvement.
- Leaders search within and outside the Organisation for opportunities to improve risk control in their area of the Organisation, to ensure it is as effective and efficient as possible.
- Leaders always consider how they influence others, recognising that good leadership is compelling, not coercive.
- They pro-actively promote a positive culture and encourage H&S improvements in all areas of organisation
- Leaders recognise that better H&S results are achieved through exercising power with, rather than control over, employees.

### SP1

- Leaders encourage people and enable them to join forces and to participate as responsible individuals in a collaborative institutional enterprise.
- Non-technical management skills development is recognised as world-class.
- Leadership demonstrates and reinforces the values and culture of the Organisation and ensure that these lead to engagement and empowerment across all levels.

#### OC6 Culture

Leaders recognise they have an obligation to foster the kind of organisational climate where people find it easy to speak up and share when they have made mistakes rather than covering up errors.



Predictable	SP1
<ul style="list-style-type: none"> <li>Leadership activities are consistent with and reinforce the Organisation’s H&amp;S policies.</li> <li>Leaders at all levels of the Organisation are credible and open to ideas for improvement.</li> <li>Leaders take responsibility to ensure that the SMS achieves its intended outcome.</li> <li>Leaders inspire others within the Organisation to work to deliver against the H&amp;S vision of the Organisation.</li> </ul>	<ul style="list-style-type: none"> <li>Non-technical management skills are recognised and developed within the Organisation.</li> </ul> <div data-bbox="815 392 1382 667" style="border: 1px solid black; border-radius: 15px; padding: 10px; background-color: #FFD700;"> <p><b>OC6 Culture</b></p> <p>Leaders take responsibility for developing, leading and promoting a positive culture in the Organisation that supports effective H&amp;S risk management.</p> </div>
Standardised	SP1
<ul style="list-style-type: none"> <li>The Organisation is built around a command-and-control structure with some feedback.</li> <li>There is a rule book-based approach to H&amp;S management, this can result in unwavering adherence to standards with little innovation or flexibility.</li> <li>Collaboration occurs as specified in ‘the rules’.</li> </ul>	<ul style="list-style-type: none"> <li>Non-technical skills are specified, and employees receive appropriate training.</li> </ul> <div data-bbox="815 806 1382 981" style="border: 1px solid black; border-radius: 15px; padding: 10px; background-color: #FFD700;"> <p><b>OC6 Culture</b></p> <p>Leadership is still largely viewed as a senior management role.</p> </div>
Managed	SP1
<ul style="list-style-type: none"> <li>There may be managers with H&amp;S leadership skills, but these are not proactively developed by the Organisation.</li> <li>Managers demonstrate leadership skills, but these are not recognised by everyone or used consistently within the Organisation.</li> <li>The Organisation’s goals and priorities are not understood by all leaders in the Organisation.</li> <li>There is no consistency over how non-technical management skills are developed in the Organisation.</li> </ul>	<ul style="list-style-type: none"> <li>Some collaboration occurs, but often by chance rather than planned, and depends on the individuals involved rather than being systematic.</li> </ul> <div data-bbox="815 1187 1382 1373" style="border: 1px solid black; border-radius: 15px; padding: 10px; background-color: #FFD700;"> <p><b>OC6 Culture</b></p> <p>Leadership is viewed solely as a senior management role.</p> </div>
Ad hoc	SP1
<ul style="list-style-type: none"> <li>There is no evidence of positive H&amp;S leadership at any level in the Organisation.</li> <li>H&amp;S leadership is not considered to be important in staff development.</li> <li>No effective application of H&amp;S leadership standards in the Organisation.</li> </ul>	<ul style="list-style-type: none"> <li>Leaders do not collaborate internally or externally.</li> <li>H&amp;S leadership skills and other nontechnical management skills are not recognised or developed within the Organisation.</li> </ul> <div data-bbox="815 1680 1382 1888" style="border: 1px solid black; border-radius: 15px; padding: 10px; background-color: #FFD700;"> <p><b>OC6 Culture</b></p> <p>Employees consider there is little effective leadership in H&amp;S at any level of the Organisation.</p> </div>

## SP2 – HEALTH AND SAFETY POLICY

### Introductory Notes

The Organisation's H&S policy should capture what the top management view is of how H&S contributes to an Organisation's success and sets a framework for making balanced business decisions at all levels.

The H&S policy and arrangements should:

- Represent the collective view of the 'controlling mind' of the board, following suitable discussion, challenge and agreement.
- Explain the business benefit of the policy in context of company purpose, activity, business model, vision, strategy and culture etc.
- Explain the relative significance of H&S risks within the range of business risks and how important H&S is to the Organisation.
- Explain how the necessary empowerment and collaboration in the 'entrepreneurial leadership' of the Organisation is balanced with the 'prudent control' of H&S risk to avoid goal-conflict in the delegation of roles, responsibilities and accountabilities.
- How the hazard / risk profile of the business determines the amount of resource time and effort put into H&S and how a reasonably practicable (proportionate) approach informs:
  - How the board and management spend time and attention in directing and overseeing implementation of H&S policy and performance.
  - The scope and complexity of the SMS and risk assessments.
  - How the financial resourcing of H&S will form part of the business planning and budgetary control and matched to the hazard / risk profile.
  - Human resource policies (including values, recruitment, development, competence, motivation, leadership style, culture, continuous improvement, corporate memory, involvement and consultation).
  - Technical support functions and policies such as design, planning and asset management.

### Excellence

- The H&S policy is used to challenge the Organisation to achieve business performance that is in-line with the best performing organisations.
- The H&S policy of the Organisation includes a realised active commitment to collaborate throughout the management chain and with external parties to achieve the H&S policy objectives.
- The H&S policy forms part of the supplier accreditation process and the Organisation ensures that all new suppliers meet the intent of the policy requirements.
- The H&S policy explains how the risk profile of

### SP2

the Organisation determines the amount of resource time and effort put into H&S.

- The H&S policy leads to a realised continual improvement of risk management.
- The H&S policy explains how H&S is integral to operational activity and the relevant responsibilities follow management hierarchies with H&S specialists acting as advisers and / or challengers.

### OC6 Culture

The H&S policy as implemented demonstrates that managing H&S risks is not a separate function but an integral part of a productive, competitive, profitable organisation, which strives for continual improvement.



Predictable	SP2
<ul style="list-style-type: none"> <li>The Organisation recognises the importance of reviewing the policy, proactively with change.</li> <li>The H&amp;S policy includes a commitment to consultation and participation of workers, and where they exist, worker representatives.</li> <li>All the Organisations policies are:                             <ul style="list-style-type: none"> <li>➢ Consistent with each other.</li> <li>➢ Reviewed and revised to drive improvements.</li> </ul> </li> <li>Interpreted in the same way by all parts of the Organisation that apply them.</li> </ul>	<ul style="list-style-type: none"> <li>The H&amp;S policy includes a commitment to maintain or improve risk management standards, even through periods of change.</li> <li>The H&amp;S policy forms part of the supplier accreditation process and the Organisation ensures that all new suppliers meet the intent of the H&amp;S policy requirements.</li> </ul> <div data-bbox="820 539 1378 730" style="border: 1px solid black; border-radius: 10px; padding: 5px;"> <p><b>OC6 Culture</b></p> <p>The actions of everyone acting in the management chain are consistent with the H&amp;S policy.</p> </div>
Standardised	SP2
<ul style="list-style-type: none"> <li>The H&amp;S policy and any other associated policies are used as a focus for managers, which results in them being consistently interpreted by all employees.</li> <li>Employees across the Organisation are actively involved in reviewing and revising the H&amp;S policy and how it is applied.</li> <li>The H&amp;S policy and any other associated policies are used as a focus for managers, which results in them being implemented consistently throughout the Organisation.</li> </ul>	<ul style="list-style-type: none"> <li>The H&amp;S policy includes a commitment to eliminate hazards and reduce H&amp;S risks relevant to the Organisation.</li> <li>The H&amp;S policy is relevant and appropriate, documented, communicated within the Organisation and to interested parties as appropriate.</li> </ul> <div data-bbox="858 1048 1378 1238" style="border: 1px solid black; border-radius: 10px; padding: 5px;"> <p><b>OC6 Culture</b></p> <p>H&amp;S policy and any other associated policies are used as a focus for managers, which results in them being responded to in the same way by all employees.</p> </div>
Managed	SP2
<ul style="list-style-type: none"> <li>The H&amp;S policy is up-to-date and is communicated within the Organisation, but local managers and supervisors have inconsistent approaches or interpretations. This results in the policy being applied in different ways across the Organisation.</li> <li>The H&amp;S policy has been formally consulted with senior trades union representatives in the Organisation.</li> <li>The H&amp;S policy is not consistently used to achieve successful risk management.</li> </ul>	<ul style="list-style-type: none"> <li>The H&amp;S policy includes a commitment to fulfil legal and other requirements.</li> <li>Some managers communicate policy on H&amp;S to contractors etc., but there is no systematic approach.</li> </ul> <div data-bbox="820 1496 1378 1675" style="border: 1px solid black; border-radius: 10px; padding: 5px;"> <p><b>OC6 Culture</b></p> <p>The purpose and content of the H&amp;S policy is not understood or applied consistently by everyone in the Organisation at all levels.</p> </div>
Ad hoc	SP2
<ul style="list-style-type: none"> <li>The H&amp;S policy statement is out of date or has not been communicated within the Organisation.</li> <li>There is no evidence of employees being consulted.</li> <li>The H&amp;S policy statement is unrealistic for the risks of the Organisation.</li> </ul>	<ul style="list-style-type: none"> <li>No communication of H&amp;S policy to outside parties, even close collaborators.</li> </ul> <div data-bbox="831 1821 1362 1955" style="border: 1px solid black; border-radius: 10px; padding: 5px;"> <p><b>OC6 Culture</b></p> <p>Employees are not aware of the H&amp;S policy or why it is relevant.</p> </div>

## SP3 – BOARD GOVERNANCE

### Introductory Notes

An effective board provides clear direction, leadership and oversight for H&S – 'the tone from the top'. From a H&S perspective, this involves:

- Setting direction by defining H&S policies, vision, strategies, goals, values and culture which are aligned with the Organisation's purpose and strategic direction.
- Defining the arrangements to manage risk and ensure H&S risks are considered when identifying the Organisation's business risks.
- Ensuring appropriate resources for controlling H&S risk are provided.
- Leading by example to promote a leadership style which supports an appropriate culture for H&S.
- Delegating to management through organisational structures and a H&S management system (SMS) which promotes collaboration and engagement with employees and other business partners.
- Developing human resource policies and reward systems which align with H&S objectives, minimising conflict with other business goals and explaining how conflicts should be resolved.
- Defining measures of the Organisation's business goals, and performance measures for the activities to achieve the business goals.
- Providing oversight and challenge to guide management in learning how to pursue improved control of H&S risk and improve the effectiveness of the SMS and:
- The board reviewing their approach and effectiveness of the direction, leadership and the oversight they provide for H&S.

### Excellence

- All members of the board show a commitment to identifying areas for improvement and effectively encourage continuous improvement in risk management through collaboration and innovation, including providing necessary resources.
- Board members are ready, able and encouraged to test strategies put forward to reduce exposure to risk from whatever source.
- The Organisation actively measures its activities against recognised good practice in H&S risk management and corporate governance.
- The board carries out a formal and extensive evaluation of its own performance against H&S objectives. This process takes account of the context, complexity and hazard / risk

### SP3

profile of the Organisation in question, including procedures which safeguard effective decision-making.

- The board are prepared to endorse excellence from within the Organisation by sharing examples and experiences and to learn from other Organisations / industries.
- The board secures effective engagement with its work force and other stakeholders.

### OC6 Culture

The board promotes a culture of continuous improvement, challenging the executive function to improve, supporting that with examples of good practice from outside the Organisation that have the capability to be implemented in a way that adds value to the business.

<b>Predictable</b>	<b>SP3</b>
<ul style="list-style-type: none"> <li>H&amp;S risk is recognised as an essential part of the overall risk to the Organisation.</li> <li>The corporate risk register is updated following changes to organisational structure, risk profile or new operations added to undertakings.</li> <li>Where appointed, non-executive directors (NEDs) have a strong and independent role in challenging H&amp;S issues.</li> <li>The board provides regular updates to stakeholders, including information</li> </ul>	<p>following changes within the Organisation.</p> <div style="background-color: #FFD700; border-radius: 15px; padding: 10px;"> <p><b>OC6 Culture</b></p> <p>The board seeks balanced indicators of safety assurance and has mechanisms in place to demonstrate the integrity of the Organisation’s assurance regime. The board demonstrates a systematic approach to understanding risk and sets clear tolerances and expectations.</p> </div>
<b>Standardised</b>	<b>SP3</b>
<ul style="list-style-type: none"> <li>The board and executive show a clear, wide-ranging understanding of the Organisation as a system, including H&amp;S management.</li> <li>H&amp;S has a champion on the board with H&amp;S training.</li> <li>The corporate risk register is complete and maintained, so the board is able to use it to direct strategy and define the Organisational risk appetite.</li> </ul>	<ul style="list-style-type: none"> <li>The board ensures that stakeholders receive sufficient and relevant information to allow them to challenge the board on H&amp;S issues as appropriate and makes provision for such challenge.</li> </ul> <div style="background-color: #FFD700; border-radius: 15px; padding: 10px;"> <p><b>OC6 Culture</b></p> <p>The role of the board and the executive in managing H&amp;S is understood. A clear expectation of risk tolerance is communicated.</p> </div>
<b>Managed</b>	<b>SP3</b>
<ul style="list-style-type: none"> <li>The board considers H&amp;S risk management, but not in a consistent manner.</li> <li>H&amp;S performance is considered at board meetings, but there is no systematic review of risk management performance.</li> <li>A corporate risk register is in place and this covers the H&amp;S risk within the Organisation but lacks sufficient detail for the</li> </ul>	<p>Organisation to be able to sufficiently direct strategy in a way that maximises safety.</p> <ul style="list-style-type: none"> <li>If requested, the board communicates on H&amp;S matters to stakeholders but does not welcome challenge.</li> </ul> <div style="background-color: #FFD700; border-radius: 15px; padding: 10px;"> <p><b>OC6 Culture</b></p> <p>Some but not all parts of the Organisation believe that the board are interested in H&amp;S.</p> </div>
<b>Ad hoc</b>	<b>SP3</b>
<ul style="list-style-type: none"> <li>The board shows little or no consideration of H&amp;S issues.</li> <li>Board meetings do not include reviews of H&amp;S performance measures.</li> <li>The corporate risk register does not cover H&amp;S issues.</li> <li>The board are focused to prevent reputation damage from litigation.</li> </ul>	<ul style="list-style-type: none"> <li>There is no communication from the board to stakeholders regarding H&amp;S.</li> </ul> <div style="background-color: #FFD700; border-radius: 15px; padding: 10px;"> <p><b>OC6 Culture</b></p> <p>Throughout the Organisation, individuals do not believe the board and executive are interested in H&amp;S.</p> </div>

## SP4 – WRITTEN HEALTH AND SAFETY MANAGEMENT SYSTEM (SMS)

### Introductory Notes

A written H&S management system (SMS) is designed to control all H&S risks which arise as a consequence of the Organisation's activities. The SMS should:

- Set out the arrangements for the control of H&S risk describing the Roles, Responsibilities, Authorities and Accountabilities, (R2A2) of those at all levels of the Organisation and how these are integrated into business operation.
- Identify:
  - Those who 'own' H&S risks in each part of the Organisation, (individuals or business functions) and implement risk controls.
  - The process owners responsible for creating and maintaining systems of risk control.
  - The contribution of H&S and professional advisers to decision-making; and
  - Those who provide audit (internal or external) of the SMS.
- Identify proportionate and appropriate hazard identification, risk assessment methods, and the design of risk controls which:
  - Consider personnel as well as process / system risks.
  - Are based on the reality of the way work is done and engage employees, volunteers and / or their representatives.
  - Recognise the impact of ageing assets.
  - Recognise the impact of interfaces and shared risk and involve business partners.
  - Apply human factors knowledge about behaviour and consider both H&S risks; and
  - Consider both the risks of performing work and the impact of work on other risk controls.
- Identify the mechanisms for engaging all employees at all levels, in learning from experience.

### Excellence

- The SMS demonstrates how the Organisation will identify opportunities to improve, not only against its own targets but against other organisations' targets which have been identified as being excellent.
- The SMS clearly demonstrates how the Organisation is kept aware of good practice in the rail and other industries, so that continuous improvement can be maintained.
- The SMS is adaptable and responsive to change, to accommodate emerging issues / risks and reasonably foreseeable developments in legislation, technology, social, environmental and political influences, whilst maintaining assurance.

### SP4

- The SMS is an integral part of the Organisation's overall management system.
- Stakeholders are consulted on and informed of best practice, to continually improve collaborative relationships and shared risk reduction.

#### OC6 Culture

SMS demonstrates a commitment to measuring and improving organisational culture.

Predictable	SP4
<ul style="list-style-type: none"> <li>The SMS presents a clear approach to managing H&amp;S. It shows how the Organisation proactively controls risk, through continual improvement of its internal arrangements, including through periods of change.</li> <li>Everyone in the Organisation can explain their role or how they might be involved in the SMS and know where to find things.</li> <li>Standards are reviewed to ensure that a formal change management system as the SMS uses and delivers the up-to-date standards.</li> </ul>	<ul style="list-style-type: none"> <li>The SMS is proportionate to the Organisation’s hazard / risk profile and features appropriate risk assessment methods.</li> <li>The SMS remains accurate and the relevant parts subject to change, through a formal change management system as and when necessary.</li> <li>Stakeholders are regularly informed of any changes to the SMS.</li> </ul> <div data-bbox="794 591 1378 763" style="border: 1px solid black; border-radius: 10px; padding: 5px;"> <p><b>OC6 Culture</b></p> <p>There is a collaborative approach across the Organisation in implementation and reviews of the SMS.</p> </div>
Standardised	SP4
<ul style="list-style-type: none"> <li>The SMS meets the criteria laid down in relevant standards and regulations.</li> <li>Each document contained within the SMS has its own author / owner and it is approved and authorised as being fit for its intended purpose.</li> <li>The SMS reflects clearly the systems in place to manage risk effectively.</li> </ul>	<ul style="list-style-type: none"> <li>The SMS clearly indicates the standards on which it is based and those it is intended to achieve.</li> <li>The SMS is communicated to stakeholders.</li> </ul> <div data-bbox="794 943 1378 1115" style="border: 1px solid black; border-radius: 10px; padding: 5px;"> <p><b>OC6 Culture</b></p> <p>There is a clear understanding at all levels and across the Organisation of how the SMS sets out to control risks and to what standard.</p> </div>
Managed	SP4
<ul style="list-style-type: none"> <li>The SMS presents a systematic approach to controlling risk, with appropriate checks and balances, and all aspects of H&amp;S are considered. It reflects the PLAN-DO-CHECK- ACT model.</li> <li>There is a process in place within the Organisation to produce and maintain a legally compliant SMS, but once produced, the SMS is not consistently applied in all parts of the Organisation.</li> <li>Both H&amp;S receive proportionate consideration in the SMS to the levels of risk they present.</li> </ul>	<ul style="list-style-type: none"> <li>There is inconsistent application of standards in the implementation of the SMS.</li> <li>The SMS is communicated internally and to regulators, but not to collaborators and those with shared risks.</li> </ul> <div data-bbox="794 1357 1378 1509" style="border: 1px solid black; border-radius: 10px; padding: 5px;"> <p><b>OC6 Culture</b></p> <p>SMS is understood by most employees as an important part of how risk is managed.</p> </div>
Ad hoc	SP4
<ul style="list-style-type: none"> <li>There is no written SMS, or if there is one it is poor and does not reflect the business activities, operations and risks.</li> <li>The SMS is based on a template or copied from another organisation. It does not reflect the business’s activities, operations and risks.</li> <li>The SMS does not address all the H&amp;S risks within the Organisation e.g., occupational health.</li> </ul>	<ul style="list-style-type: none"> <li>It is not clear what standards the Organisation is using.</li> <li>Employees who should be aware and involved in the SMS are not.</li> </ul> <div data-bbox="794 1794 1378 1935" style="border: 1px solid black; border-radius: 10px; padding: 5px;"> <p><b>OC6 Culture</b></p> <p>The SMS is seen as unimportant and poorly understood.</p> </div>

## OC – ORGANISING FOR CONTROL AND COMMUNICATION

### Purpose

- To set out responsibilities for meeting the Organisations health H&S objectives.
- To make sure that important information is available to those making decisions.
- The Organisation’s arrangements and actions promote a culture that makes excellence in risk control possible.
- Organisations have controls in place so that risks are identified and adequately controlled.

### Introductory Notes

H&S policies set the direction for H&S, but organisations need to create a strong framework for management activities, setting out the roles, responsibilities, authorities and accountabilities that will improve performance.

Two important issues are **control** and **communication**.

**Control** is the foundation of a positive H&S culture.

- Maintaining control is central to all management functions. Control of H&S is achieved by allocating and carrying out responsibilities which relate to H&S objectives.
- Organisations rely on the empowerment and engagement of employees and the Organisation has to balance giving the necessary freedom and flexibility with the need for good control of risk. The boundaries of discretion need to be clearly drawn – it should be clear when strict adherence to H&S procedures is essential. In many cases learning from trial and error and experience is too costly for those involved.
- H&S and employee representatives make an important contribution. Employees /volunteers should be focused on developing and maintaining systems of control before events happen – not on blaming people for failures after events.

**Communication** is often a challenge to organisations.

- It is important that the messages which senior managers want people to understand are the ones the people actually hear.
- Effective, proactive and reactive communication about H&S relies on accurate and clear information coming into the Organisation, flowing within it, and going out from it.

**Organising for Control and Communication ensures:**

- **OC1 Allocation** of responsibilities – the Organisation is structured to put the Organisation’s policies, strategies and plans into practice as efficiently as possible, as part of its operation.
- **OC2 Management and supervisory accountability** – those with H&S responsibilities are motivated and held accountable for performance, in-line with systems and methods used for other parts of the Organisation.
- **OC3 Organisational structure** – organisational structures facilitate flexibility and collaborative working.
- **OC4 Internal communication arrangements** – communication throughout the Organisation is sufficient and suitable to ensure those making decisions which impact on H&S are appropriately informed with up-to-date relevant information.
- **OC5 System safety and interface arrangements** – there is effective collaboration on H&S risk across system and organisational boundaries.
- **OC6 Organisational culture** – the significant ways of thinking and doing which underpin a positive H&S culture suited to the Organisation, are identified and applied.
- **OC7 Record keeping, document control and knowledge management** – suitable information is collected, stored and is readily retrievable, to support H&S decision-making and, effective and reliable control of risk at all levels.



## OC1 – ALLOCATION OF RESPONSIBILITIES

### Introductory Note

The Organisation is structured to implement its policies, strategies and plans into practice as efficiently as possible, as part of its operation.

This means:

- Clear delegation of roles, responsibilities, authorities and accountabilities for H&S are aligned and integrated into the operation of the Organisation.
- The roles of risk owners and advisers are clear.
- Allocating people and teams roles, tasks and objectives which secure effective collaboration in meeting the Organisation’s H&S objectives.
- The potential for conflict between H&S and other business objectives is acknowledged and minimised and there is a process for resolving conflicts
- Having the right people, doing the right thing, at the right time.

### Excellence

### OC1

- The Organisation looks externally for factors which offer opportunities for continuous improvement of risk control and allocates roles and responsibilities to support this.
- Individuals at all levels across the Organisation take responsibility to seek improvement in risk control from within and outside the Organisation.
- Individuals with H&S roles and responsibilities routinely look at how they might develop themselves and processes to continuously improve risk control.

- Roles and responsibilities are reviewed to ensure they remain in-line with standards in recognised high performing organisations.
- Individuals from collaborating organisations recognise and undertake roles and responsibilities allocated during collaborative activities.

#### OC6 Culture

Employees seek to improve organisational performance by taking on additional tasks and responsibilities especially those relating to H&S.

### Predictable

### OC1

- Responsibilities are systematically identified with clear links between the Organisation's objectives and individual's responsibility and are adaptable to changes in circumstances.
- H&S activities and decision-making activities are given to the people who are best placed to carry them out.
- Individuals involved in commercial and other decision-making roles know what is expected of them, in relation to their H&S responsibilities and demonstrate they contribute to effective risk control.

- H&S responsibilities are allocated with the same consideration as other business responsibilities. This makes sure that the right resources are available and used.
- The responsibilities allocated include those for ensuring risk control in collaborative situations.

#### OC6 Culture

There is a culture of employees at all levels taking responsibility for H&S within a strong management framework.

Standardised	OC1
<ul style="list-style-type: none"> <li>Responsibilities are systematically identified and given in writing to teams or individuals, who accept them in order to meet H&amp;S objectives.</li> <li>Senior management ensure that the responsibilities set out in the H&amp;S management system (SMS) are assigned and communicated at all levels within the Organisation and maintained as documented information.</li> <li>Operational staff at each level across the Organisation assume responsibility for those aspects of the SMS over which they have control.</li> </ul>	<ul style="list-style-type: none"> <li>Responsibilities and authorities are assigned for ensuring that the SMS conforms to relevant standards and reporting on the performance of the SMS to senior management.</li> <li>The system for setting performance standards is integrated into the contractor management system.</li> </ul> <div data-bbox="798 539 1380 757" style="border: 1px solid orange; border-radius: 15px; padding: 10px; margin-top: 10px;"> <p><b>OC6 Culture</b></p> <p>Employees at all levels know what is expected of them in relation to their H&amp;S responsibilities with a belief that the right people are doing the right thing at the right time.</p> </div>
Managed	OC1
<ul style="list-style-type: none"> <li>H&amp;S roles are allocated mainly to those dedicated to H&amp;S functions, e.g., H&amp;S team or individuals who control site safety.</li> <li>H&amp;S responsibilities appear in job descriptions or objectives, though not consistently.</li> <li>There is no overall policy on, or evidence of, responsibility being allocated in a consistent and systematic way.</li> <li>Inconsistent application of performance standards in the Organisation.</li> <li>Some performance standards exist for collaborative situations, but no consistency in their application.</li> </ul>	<ul style="list-style-type: none"> <li>Some performance standards exist for collaborative situations, but no consistency in their application.</li> </ul> <div data-bbox="798 909 1380 1126" style="border: 1px solid orange; border-radius: 15px; padding: 10px; margin-top: 10px;"> <p><b>OC6 Culture</b></p> <p>Employees recognise when performance standards exist and use them if available. Most employees, but not all, know what is expected of them in relation to their H&amp;S responsibilities.</p> </div>
Ad hoc	OC1
<ul style="list-style-type: none"> <li>H&amp;S roles, tasks and objectives are not defined.</li> <li>Responsibilities relating to H&amp;S are not allocated to individuals and teams.</li> <li>There is no process for identifying performance standards relating to H&amp;S responsibilities, so no standards are identified or applied.</li> </ul>	<ul style="list-style-type: none"> <li>Areas of collaboration are not identified.</li> </ul> <div data-bbox="798 1406 1380 1559" style="border: 1px solid orange; border-radius: 15px; padding: 10px; margin-top: 10px;"> <p><b>OC6 Culture</b></p> <p>Employees do what is necessary to get the job done, if it is done safely then all the better.</p> </div>



## OC2 – MANAGEMENT AND SUPERVISORY ACCOUNTABILITY

### Introductory Note

Those with responsibilities for H&S are motivated and held accountable for performance in-line with systems and methods used for other parts of the business. All those with roles, responsibilities, authorities and accountabilities, tasks and objectives relating to H&S are:

- Motivated and rewarded in-line with the Organisation’s reward systems with an emphasis on positive rewards for good work in risk control.
- Held accountable for meeting those expectations.

Adequate supervision is provided. Spans of control and supervisory ratios are appropriate and realistic, taking into account the nature of the work, the dispersion of staff and human factors considerations.

### Excellence

### OC2

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>• The Organisation actively shares best practice whilst learning and implementing improvements from wider industry groups.</li> <li>• The processes allow the Organisation to actively participate in sharing good management practice from other industry groups.</li> <li>• The Organisation proactively takes ownership to influence improvements to H&amp;S risk control.</li> <li>• Good supervision and effective supervisory roles are embedded within the Organisation’s corporate structure and operational delivery.</li> </ul> | <ul style="list-style-type: none"> <li>• The Organisation uses the mechanisms in place to instigate change and have the confidence to use them.</li> <li>• The Organisation seeks out wider opportunities across the sector’s key stakeholders and beyond, to learn from and share best practice with other industries.</li> </ul> |
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#### OC6 Culture

The Organisation understands the wider-industry culture and takes active participation to improve H&S risk control.

### Predictable

### OC2

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|--|--|
| <ul style="list-style-type: none"> <li>• Individuals can adapt and manage change in accountability to influence improvements in standards and risk management.</li> <li>• The processes provide individuals with the confidence to challenge organisational norms and proactively and independently seek out improvements to the risk management systems.</li> <li>• Managers and supervisors fully understand how taking accountability lends itself to risk reduction methodology.</li> <li>• Individuals pro-actively take ownership to influence improvements to H&amp;S risk control.</li> <li>• The individuals understand the mechanisms in place to instigate change and have the confidence to use them.</li> </ul> | <ul style="list-style-type: none"> <li>• Individuals actively seek additional roles and accountabilities to achieve the Organisation’s strategic risk management aims.</li> <li>• Changes in supervisory arrangements and accountabilities are planned as part of any change.</li> </ul> |
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#### OC6 Culture

Individuals recognise the risks and are proactive in informing others and forming groups that support a culture of risk minimisation.

Standardised	OC2
<ul style="list-style-type: none"> <li>Teams and individuals responsible for controlling significant risks, know and understand their responsibilities and apply them in the correct manner.</li> <li>There are processes in place to allow managers to manage appraisal systems to reward and correct behaviours and outcomes, but also to make sure there are no unintended consequences of these appraisals.</li> <li>Individuals are clear on their roles and responsibilities and effectively deploy and actively engage to improve H&amp;S risk controls.</li> <li>There are effective procedures and processes in place for all significant risks.</li> </ul>	<ul style="list-style-type: none"> <li>Collaboration is effective, and individuals are given and accept additional responsibilities.</li> <li>Supervision and supervisory roles are adequate.</li> <li>Supervisory arrangements are proportionate and adaptable to control risks associated with those new to a job, learning new processes, carrying out infrequent high-risk work and remote /lone working.</li> </ul> <div data-bbox="786 555 1382 801" style="background-color: #f4a460; border-radius: 15px; padding: 10px; margin-top: 10px;"> <p><b>OC6 Culture</b></p> <p>There is recognition and acceptance between individuals in the Organisation over roles and responsibilities and mutual involvement to achieve business objectives.</p> </div>
Managed	OC2
<ul style="list-style-type: none"> <li>Some managers and supervisors hold their employees accountable, but there is no consistency of application.</li> <li>Some processes for controlling responsibilities exist, through procedures or performance reviews, but not for all significant risks.</li> <li>Individuals are unclear on some roles and responsibilities relating to control of H&amp;S risks.</li> </ul>	<ul style="list-style-type: none"> <li>There are some procedures and processes in place, but not for all significant risks.</li> <li>There is some definition of collaborative arrangements, but with minimal impact on collaboration.</li> </ul> <div data-bbox="786 1039 1382 1254" style="background-color: #f4a460; border-radius: 15px; padding: 10px; margin-top: 10px;"> <p><b>OC6 Culture</b></p> <p>Individuals know their responsibilities, but there is no consistent evidence of ownership across the Organisation.</p> </div>
Ad hoc	OC2
<ul style="list-style-type: none"> <li>Managers and supervisors rarely, if ever, hold their employees to account for their H&amp;S duties.</li> <li>There is inconsistency between accountability for H&amp;S and accountability for other business activities.</li> <li>Individuals are unclear on their roles and responsibilities relating to control of H&amp;S risks.</li> <li>There is a lack of procedures and processes to ensure accountability for H&amp;S. (e.g., in job descriptions).</li> </ul>	<ul style="list-style-type: none"> <li>Supervision and supervisory roles are not clearly defined or consistently applied.</li> <li>Collaboration arrangements are undefined and there is no proactive inclusion of employees involved (a failure of organisational structure).</li> </ul> <div data-bbox="786 1527 1382 1706" style="background-color: #f4a460; border-radius: 15px; padding: 10px; margin-top: 10px;"> <p><b>OC6 Culture</b></p> <p>There is a culture of non-acceptance and lack of understanding of responsibilities.</p> </div>

## OC3 – ORGANISATIONAL STRUCTURE

### Introductory Note

Disaggregated Organisations, such as railway and tram companies, are complex operations requiring flexible and collaborative working, both within the Organisation and through interfaces with other business partners. The clarity of roles for H&S between front-line operations, support staff and technical experts, needs careful thought, to ensure that H&S roles, responsibilities, authorities and accountabilities, fit sensibly into management structures and to ensure there are no gaps in responsibilities. Layers of management structure complicate reporting lines and accountabilities. Maintaining an effective Organisation structure is a continual challenge, as operational conditions and demands change.

#### Excellence

#### OC3

- The Organisational structure is designed to be flexible to respond to internal and external changes, whilst still delivering H&S objectives and continual improvement.
- The board and senior managers look to learn from the structure of other Organisations, who are effectively managing H&S, and identify improvements for their own Organisation.
- The Organisational structure evolves to continuously improve performance in risk management.

- The Organisation actively seeks new or improved standards to drive continuous improvement.
- Pre and post-collaborative project reviews are carried out, to learn and drive continuous improvement.

#### OC6 Culture

Individuals believe that the Organisational structure is evolving to drive continuous improvement in risk management.

#### Predictable

#### OC3

- The Organisational structure is designed in-line with the H&S policy and objectives.
- Responsibilities for risk control area located from the top to the bottom of the Organisation, not just at working levels.
- There is systematic alignment of the H&S policy and objectives with organisational structure.
- The Organisation remains structured to deliver objectives stated in H&S policies and procedures, even after changes to structure or operations are undertaken by the Organisation.

- Organisational structures are sufficiently flexible to continue to effect risk management during periods of change.
- Organisational structures for collaborative projects are sufficiently flexible to continue to effect risk management during periods of change.

#### OC6 Culture

Individuals believe that structures are sufficiently flexible to ensure effective risk management even in periods of change.

Standardised	OC3
<ul style="list-style-type: none"> <li>The structure of the Organisation means that all of the H&amp;S risks are managed by the people or teams carrying out the work, and there is effective control of risks, which are shared between teams.</li> <li>Responsibility for risk control systems is in-line with responsibility for other business objectives. This provides clarity and consistency between similar activities and business units.</li> <li>Standards are identified and used to ensure that organisational structures are best able to deliver effective risk management.</li> </ul>	<ul style="list-style-type: none"> <li>Overall policies and strategies are consistent with those of the relevant business units.</li> <li>There is a systematic approach used to implement collaborative management structures, well-suited to deliver effective risk management.</li> </ul> <div data-bbox="821 488 1377 667" style="border: 1px solid orange; border-radius: 15px; padding: 10px; margin-top: 10px;"> <p><b>OC6 Culture</b></p> <p>Individuals believe that the Organisation’s structure is planned to achieve effective risk management.</p> </div>
Managed	OC3
<ul style="list-style-type: none"> <li>The structure of the Organisation means that most risks are managed by the people or teams carrying out the work, but some risks are shared between teams, so that responsibilities could still be confused, missed or duplicated.</li> <li>There is little consistency between the activities of a business unit and the wider aims of a strategy or policy.</li> <li>Some collaborative ventures have management structures developed to allow effective risk management, but no systematic approach.</li> </ul>	<ul style="list-style-type: none"> <li>There is conflict between H&amp;S and other objectives.</li> <li>There is inconsistent use of standards.</li> </ul> <div data-bbox="821 880 1377 1093" style="border: 1px solid orange; border-radius: 15px; padding: 10px; margin-top: 10px;"> <p><b>OC6 Culture</b></p> <p>Some individuals understand the link between structure and effective risk management but there is no system in place to ensure it happens.</p> </div>
Ad hoc	OC3
<ul style="list-style-type: none"> <li>The Organisation’s management structure is not aligned with its H&amp;S objectives. Employee responsibilities and accountabilities are easily confused, missed or duplicated.</li> <li>The organisational structure is not linked to the SMS or risk management systems. organisational structure is as it is for historical reasons, rather than being tailored to needs.</li> <li>The objectives of the SMS are not achieved, because key roles are not in place.</li> </ul>	<ul style="list-style-type: none"> <li>There is ineffective use of any standards.</li> <li>The structure of departments involved in collaboration are not considered in terms of risk management.</li> </ul> <div data-bbox="821 1393 1377 1572" style="border: 1px solid orange; border-radius: 15px; padding: 10px; margin-top: 10px;"> <p><b>OC6 Culture</b></p> <p>There is little or no understanding of the need for organisational structures to enable effective risk management.</p> </div>

## OC4 – INTERNAL COMMUNICATION ARRANGEMENTS

### Introductory Note

Communication throughout the Organisation is sufficient and suitable to ensure those making decisions, which impact on H&S, are appropriately informed with up-to-date relevant information. Arrangements make sure that all those making a decision or performing a task, which impact on H&S, have the right information, in the right form and by the right method, including things such as:

- Corporate messages.
- Procedures and standards.
- Factual data, (plans, diagrams, records) and intelligence; and
- Instructions and reports.

### Excellence

### OC4

- Employees are able to communicate any concerns and issues or identify improvements to information, instructions, standards and procedures. This is acted upon by managers and feedback is given promptly.
- The Organisation looks at how other Organisations communicate H&S information and implements best practice.
- There is active pursuit of continuous improvement in communication within the Organisation.

- There are active attempts to continuously improve the two-way exchange of risk management information with collaborators.
- Effective risk management is based on the provision of adequate information.

### OC6 Culture

There is a culture throughout the Organisation of open communication which is effective and supports continuous improvement.

### Predictable

### OC4

- Users are involved in regular reviews of information, instructions, standards and procedures to ensure they remain current and relevant.
- The right information is available to support the making of correct decisions.
- Effective procedures for gathering feedback, ensure that communications are understood and there is effective two-way communication.

- Communication of changes to task instructions, systems of work etc. with collaborators (including contractors and suppliers) is an integral part of ensuring successful change.

### OC6 Culture

There is a culture of employees reporting their performance / experiences and these are routinely acted on by the Organisation.

Standardised	OC4
<ul style="list-style-type: none"> <li>Information, instructions, standards and procedures for controlling significant risks are in formats optimised for users. The information is readily available.</li> <li>Employees routinely look towards the relevant instructions and procedures before performing tasks or making decisions and understand the reasons why the information should be followed.</li> </ul>	<ul style="list-style-type: none"> <li>Managers give instructions which reinforce H&amp;S procedures.</li> </ul> <div data-bbox="778 360 1378 622" style="border: 1px solid black; border-radius: 15px; padding: 10px; background-color: #f96;"> <p><b>OC6 Culture</b></p> <p>Factual information is used to share experiences and guide future performance and decisions among the various levels and functions of the Organisation. For example through safety bulletins.</p> </div>
Managed	OC4
<ul style="list-style-type: none"> <li>Some procedures and standards relating to risk controls are available to staff.</li> <li>Most employees recognised importance, of instructions, standards and procedures and use these to make decisions or guide them in performing a task.</li> <li>Managers give instructions and receive reports relating to controlling risks, but there is a lack of consistency.</li> </ul>	<ul style="list-style-type: none"> <li>Some information is used to guide decisions.</li> <li>Some information is shared, but this is inconsistent and depends on individuals, rather than a systematic approach.</li> </ul> <div data-bbox="778 819 1378 1010" style="border: 1px solid black; border-radius: 15px; padding: 10px; background-color: #f96;"> <p><b>OC6 Culture</b></p> <p>Decisions are made on the basis of what information is available, even if this is incomplete.</p> </div>
Ad hoc	OC4
<ul style="list-style-type: none"> <li>Employees making decisions or performing tasks make little or no attempt to find relevant procedures.</li> <li>There is no formalised system to ensure knowledge is imparted to those who need to use it.</li> <li>Managers do not talk to employees, or talk ineffectively, so that the right risk control actions are not followed. Employees are not alerted to the presence of new or changed procedures.</li> </ul>	<ul style="list-style-type: none"> <li>No intelligence is collected or shared to demonstrate the effectiveness of the risk control information.</li> <li>Little or no information is shared as part of collaborative enterprises.</li> </ul> <div data-bbox="778 1245 1378 1435" style="border: 1px solid black; border-radius: 15px; padding: 10px; background-color: #f96;"> <p><b>OC6 Culture</b></p> <p>There is a culture of employees making decisions on their own judgement without reference to documents or other personnel.</p> </div>

## OC5 – SYSTEM SAFETY AND INTERFACE ARRANGEMENTS

### Introductory Note

There is effective collaboration on H&S risk control across system and organisational boundaries. Risk Management (PI1) deals with the identification of interfaces and the associated risk controls. Effective teamwork and co-operation are needed to implement these controls and make sure systems across the Organisation and between Organisations are safe. Organisations need to collaborate to agree a common understanding of interface / shared hazards and risks and the development, and the implementation of compatible means of risk control, in pursuit of common goals and priorities. SMS methods and requirements are aligned to facilitate common working.

### Excellence

- The Organisation looks to other sectors and countries to identify system-safety issues and controls and there is evidence that this has led to continuous improvement.
- The procedures and standards drive the Organisation to strive for continuous improvement and look for best practice from other industries.
- Best practice is drawn from, implemented and shared with other Organisations.

### OC5

- There are arrangements for sharing information between Organisations with shared H&S risks, in order to promote effective reviews and continual improvement.

#### OC6 Culture

There is a culture that people are empowered and encouraged to understand and share information beyond their own Organisation to continually improve the control of shared, common and emerging risks.

### Predictable

- There is effective use of industry knowledge and collaboration across direct and indirect interfaces leading to clear understanding and control of shared and common risks.
- The procedures and standards are effective and consistently used to control both shared and common risks, including merging risks.
- There are regular discussions with other Organisations to agree objectives, standards, processes and arrangements.

### OC5

- All system safety interface risks are reviewed within specified timescales. These reviews ensure awareness is given to changes at any level.

#### OC6 Culture

There is an organisational culture which enables proactive management of emerging risks across direct and indirect interfaces.

Standardised	OC5
<ul style="list-style-type: none"> <li>Organisational arrangements are in place to ensure direct interfaces are identified and there is effective collaboration and implementation of shared risk controls.</li> <li>Procedures and standards are in place and consistently used to control shared risks.</li> <li>Communications outside the Organisation make sure that anyone making a decision relating to risk controls with cross-organisational boundaries is in possession of the right information in the form of procedures and standards, factual data and intelligence, and instructions and reports.</li> </ul>	<ul style="list-style-type: none"> <li>Organisational oversight results in the procedures and standards for shared risks being owned, reviewed and effectively implemented.</li> </ul> <div data-bbox="839 394 1426 560" style="border: 1px solid orange; border-radius: 10px; padding: 5px;"> <p><b>OC6 Culture</b>                      There is an organisational culture which enables effective understanding, sharing and risk control across direct interfaces.</p> </div>
Managed	OC5
<ul style="list-style-type: none"> <li>Procedures identify interfaces between business units at a working level. There is liaison with other Organisations over procedures and standards implemented.</li> <li>Procedures are used by employees for some shared risk controls.</li> <li>There is co-ordination of practical issues at working level between individuals of Organisations, but there is no overall organisational oversight, resulting in inconsistent planning and execution.</li> </ul>	<ul style="list-style-type: none"> <li>There is a culture of sharing information generally only at working levels.</li> </ul> <div data-bbox="839 842 1426 1008" style="border: 1px solid orange; border-radius: 10px; padding: 5px;"> <p><b>OC6 Culture</b>                      There is a culture of sharing information generally only at working levels.</p> </div>
Ad hoc	OC5
<ul style="list-style-type: none"> <li>The Organisation makes little attempt to identify or collaborate on work with other Organisations in respect of shared risk controls.</li> <li>Procedures to identify and manage shared risk control do not exist or are weak.</li> </ul>	<ul style="list-style-type: none"> <li>No information is collected or shared.</li> </ul> <div data-bbox="839 1245 1426 1411" style="border: 1px solid orange; border-radius: 10px; padding: 5px;"> <p><b>OC6 Culture</b>                      People work in isolation with little understanding or concern of how their activities may influence and affect others.</p> </div>



## OC6 – ORGANISATIONAL CULTURE

### Introductory Note

The significant ways of thinking and doing, which underpin a positive H&S culture suited to the Organisation, are identified, and applied. Culture is a lever, which can assist senior managers to improve a company and its safety performance. Setting out a culture strategy for H&S as part of a H&S management system is a necessity for excellence.

Culture consists of the shared ways of thinking and doing in respect of the most significant risks to the Organisation, which underpin the approach to devising and implementing the SMS.

Current thinking suggests there are 'seven attributes of an integrated H&S culture', these are shown below. Different positive cultural characteristics may be more relevant to some parts of the business. For example, a just and fair reporting culture, may be more pertinent to enhance learning in front-line work, whereas a process safety culture of doubt, and a challenge culture or questioning, may be more relevant to those in engineering functions concerned with the high hazard systemic risks of the infrastructure.

### Seven Attributes of an Integrated Health and Safety Culture

- (1) **Shared awareness of the most significant risks**, anticipate risks beyond what the most frequent accidents reveal:
  - Indicators other than incident rate.
  - Explain the content of the safety case / certificate.
  - Fight against fatalism.
- (2) **Questioning attitude**, share the conviction that risks are never fully controlled:
  - Culture of doubt.
  - Culture of sensitivity to operations.
  - Shared vigilance.
  - Search for the root causes of events.
  - Learning culture.
- (3) **Integrated culture everyone is mobilised**, acknowledging that no single person has all the knowledge necessary to ensure safety:
  - Senior management, managers, employees / volunteers.
  - Support departments.
  - Interface management.
  - Employee representative bodies.
  - Contractor companies.
- (4) **Right balance between rule-based and managed safety**, anticipate as best as possible and deal with the unexpected:
  - Preparation for crises and unexpected events.
  - Developing resilience.
  - Flexible culture.
- (5) **Constant attention to the three pillars:**
  - Human and Organisation factors.
  - Health and safety management system; and
  - Technical safety.
- (6) **Management leadership and employee involvement**, encourage safe compliance and proactiveness:
  - Importance given to safety decision-making.
  - Participative directive leadership.
  - Dialogue.
  - Role of work groups.
  - Debates between professionals.
- (7) **Culture of transparency**, anticipate as best as possible and deal with the unexpected:
  - Just culture.

- Information flow.
- Consistency between words and actions.
- Truthful external communication.

### Testing Organisational Culture and RM3

There are different ways of finding out about an Organisation's H&S culture:

- By routinely gathering informal information about the H&S culture during monitoring, Inspections, investigations, and other dealings with employees / volunteers, interfacing Organisations, and the supply chain. For instance, workers on site during a routine preventive inspection may comment that performance pressures sometimes take priority over risk controls. In this case, as well as investigating the allegation, the background should be recorded to build-up a picture of the Organisation's H&S culture.
- Organisations can conduct H&S culture or safety climate assessments, using techniques and toolkits, such as the UK RSSB's Safety Culture toolkit [5]. These assessments can provide useful information on the current safety culture, and provide information and views about leadership, communications, learning culture, employee involvement and attitudes to blame.

RM3 is not intended to be a substitute for other safety culture assessment tools, but in this version, there are highlighted 'culture information boxes' against every level of maturity in all RM3 Criteria. Inspectors using these information boxes will see elements of the 'seven attributes' throughout the RM3 Criteria. The information boxes suggest typical actions, beliefs and behaviors held by employees, at all levels, thereby suggesting the culture of the Organisation.

The 'culture information boxes' provided for every maturity level against each criteria are intended to assist in forming an overall assessment for OC6, in conjunction with the statements for each maturity level shown below.

#### Excellence

#### OC6

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• The Organisation shows a culture which helps to deliver excellence in risk controls, and a commitment to continuously improve risk controls.</li> <li>• There is no evidence that the Organisation is complacent.</li> <li>• The Organisation:                             <ul style="list-style-type: none"> <li>➢ respects, anticipates and responds to risks;</li> <li>➢ develops a fair, learning, flexible, adaptable, prepared and informed culture; and</li> <li>➢ aims to be resilient.</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>• The Organisation shows excellent leadership relating to safety</li> <li>• There is excellent two-way communication between management and employees, excellent employee involvement, an excellent culture of learning, and mutual trust, where management and employees agree on acceptable and unacceptable standards.</li> </ul> |
|---|---|

#### Predictable

#### OC6

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>• Most staff are convinced that health and safety is important, both morally and for financial reasons.</li> <li>• Management recognises that a wide range of factors leads to accidents, and the root causes are likely to stem from management decisions.</li> <li>• Frontline staff accept responsibility for their own and other people's health and safety.</li> <li>• The Organisation recognises how important it is for all employees to feel valued and be treated fairly.</li> </ul> | <ul style="list-style-type: none"> <li>• The Organisation takes measures to prevent accidents.</li> <li>• Safety performance is monitored using all the information available.</li> <li>• The Organisation promotes a healthy lifestyle.</li> <li>• The Organisation tries to spot failings in the system and correct them before they cause a problem.</li> </ul> |
|---|--|

Standardised	OC6
<ul style="list-style-type: none"> <li>• There is evidence that the Organisation realises that employee involvement is essential for improving safety improvement, and that a wide range of factors often coming from management decisions lead to accidents.</li> </ul>	<ul style="list-style-type: none"> <li>• A significant proportion of frontline employees are willing to work with management to improve health and safety.</li> <li>• Most staff accept responsibility for their own health and safety.</li> <li>• Safety performance is monitored, and the findings are used to make improvements.</li> </ul>
Managed	OC6
<ul style="list-style-type: none"> <li>• Safety is seen as a business risk, and management devotes time and effort to prevent accidents.</li> <li>• Safety measures focus on keeping to rules, procedures and engineering controls.</li> <li>• Accidents are seen as being preventable.</li> <li>• Management feels that most accidents are due to the unsafe behaviour of frontline workers.</li> </ul>	<ul style="list-style-type: none"> <li>• Safety performance is measured with lagged indicators (indicators with a delayed effect, for example, injury rates).</li> <li>• Safety incentives are based on reducing lost time.</li> <li>• Senior managers only become involved in health and safety if accidents increase and enforcement action is likely to be taken against the organisation.</li> </ul>
Ad hoc	OC6
<ul style="list-style-type: none"> <li>• Safety measures focus on technical and procedural solutions and keeping to regulations.</li> <li>• Safety is not seen as an important business risk.</li> <li>• The safety department, and not individuals, is considered to be responsible for safety.</li> <li>• Many accidents are seen as unavoidable.</li> <li>• Most frontline workers are not interested in safety. It is only used as a lever on other issues.</li> <li>• Financial targets take priority over safety.</li> </ul>	<ul style="list-style-type: none"> <li>• There is poor leadership on safety issues.</li> <li>• There is poor two-way communication between management and employees.</li> <li>• There is poor employee involvement.</li> <li>• The organisation's learning arrangements are poor.</li> <li>• There is a blame culture (where focus is placed on finding out who is to blame) or a relaxed attitude to accountability (no blame culture).</li> </ul>

## OC7 – RECORD-KEEPING, DOCUMENT CONTROL, AND KNOWLEDGE MANAGEMENT

### Introductory Note

Suitable information is collected, stored and is readily retrievable to support H&S decision-making and effective and reliable control of risk at all levels. Preserving ‘corporate memory’ on H&S within the H&S management system (SMS) is essential for learning and continuous improvement. Learning what does and does not work, is the basis of repeating good performance and avoiding repeating mistakes.

This includes information, such as:

- Records of assets, design parameters and calculations, diagrams and drawings.
- Processes and procedures.
- Hazard studies and risk assessments.
- Progress with strategies and plans, monitoring, audit and review; and
- Records of important decisions.

The SMS needs to identify key information and processes for updating the information and storage and retrieval systems, to enable ready access by those who need to know, so they can make informed decisions.

Knowledge management processes capture the experience and learning of those who are leaving the Organisation.

### Excellence

### OC7

- Records, decisions and information from outside the industry are available to users and decision-makers who use them to continuously improve risk controls.
- Records and documents are comprehensive in scope and include all relevant features to assist in managing H&S risks, or they are readily available from third parties through transparent communication.
- The procedures and standards facilitate learning lessons and sharing information beyond the

industry enabling continuous improvement.

- Records are effectively used to drive continuous improvement in risk control.

#### OC6 Culture

The importance of maintaining and growing corporate knowledge to deliver continuous improvement is embedded in all levels of the Organisation’s culture.

### Predictable

### OC7

- Comprehensive records, including shared industry records, of risk-related processes and standards, decisions and information are available to users and decision-makers, who use them effectively to develop and review risk controls.  
 The Organisation’s records and decision-making are shared with industry and the Organisation uses industry data in its own decision-making and reviews, and this is effective in developing

cross-industry best practice.

- All records have periods of retention assigned to them.
- Systems are in place for capturing and retaining corporate knowledge.

#### OC6 Culture

There is a culture of making decisions based on corporate knowledge.

Standardised	OC7
<ul style="list-style-type: none"> <li>Records of risk-related processes and standards, decisions and information are readily available and utilised consistently by decision-makers.</li> <li>The procedures and standards look beyond internal records to support and draw on shared industry knowledge in decision-making.</li> <li>The Organisation’s records and decision making are shared with industry and the Organisation uses industry data in its own decision-making and reviews, and this is effective in developing cross-industry best practice.</li> <li>Documented information contains appropriate identification and description, format, status, review and approval.</li> </ul>	<ul style="list-style-type: none"> <li>Record keeping includes sharing relevant records during collaborative working.</li> <li>Records are kept of important information and decisions that are likely to be valuable in the future.</li> </ul> <div data-bbox="837 459 1439 660" style="border: 1px solid orange; border-radius: 15px; padding: 10px;"> <p><b>OC6 Culture</b>                      All employees understand why corporate knowledge is important and work with the Organisational processes to develop and maintain it.</p> </div>
Managed	OC7
<ul style="list-style-type: none"> <li>There are some records of information on important risk controls, but the records are inconsistent and not used effectively by decision-makers.</li> <li>Procedures are used for managing some record keeping, document control and knowledge management, but are inconsistent in use across the Organisation.</li> <li>There are records of processes and standards for main risks which are used to inform decisions but are used inconsistently across the Organisation.</li> </ul>	<ul style="list-style-type: none"> <li>Records are created, maintained and updated by appropriate competent individuals.</li> </ul> <div data-bbox="837 952 1439 1227" style="border: 1px solid orange; border-radius: 15px; padding: 10px;"> <p><b>OC6 Culture</b>                      There are pockets of information retention by individuals or parts of the Organisation, but the importance of developing and retaining corporate knowledge is not widely understood or valued.</p> </div>
Ad hoc	OC7
<ul style="list-style-type: none"> <li>There are few or no written records.</li> <li>Procedures to identify and manage record keeping, document and knowledge management do not exist or are weak.</li> <li>Any decisions made are frequently only based on an individual's knowledge.</li> <li>The Organisation is unable to use records to demonstrate that risk management was considered in decision-making.</li> </ul>	<ul style="list-style-type: none"> <li>There is no sharing of information on decision-making.</li> </ul> <div data-bbox="837 1415 1439 1594" style="border: 1px solid orange; border-radius: 15px; padding: 10px;"> <p><b>OC6 Culture</b>                      There is no evidence of corporate knowledge, only individual's memory.</p> </div>

## OP – SECURING CO-OPERATION, COMPETENCE AND DEVELOPMENT OF EMPLOYEES AT ALL LEVELS

### Purpose

- To find out whether the Organisation has employees with the competencies (knowledge, skills, experience and abilities) needed to perform effectively, efficiently and safely.
- To see if the Organisation's recruitment, selection, training and development policies focus, as far as possible, on meeting the Organisation's H&S objectives.
- To prove how much the Organisation consults its employees at all levels to make sure that knowledge and experience are shared, and H&S becomes 'everybody's business'.

### Introductory Notes

Employee (including volunteer) involvement and engagement supports risk control by:

- Drawing on their experience and learning so that the H&S, SMS, risk assessments and risk controls are practical, and reality based.
- Encouraging 'ownership' of H&S policies and procedures.

It makes sure the Organisation as a whole, and people working in it, benefit from good H&S performance. Sharing knowledge and experience means that H&S becomes 'everybody's business'.

Organisations need an effective system for managing competence to help make sure that their employees and volunteers have the appropriate skills. Making sure that workers, supervisors, managers and directors have and keep, the appropriate skills, helps assure those members of staff make safe decisions and carry out their work safely, reducing the risks to themselves and to other people.

Securing co-operation and competence ensures:

- **OP1 Worker involvement and internal co-operation** – employees / volunteers, trade unions and their representatives are actively consulted and engaged in making the business safe and healthy; and
- **OP2 Competence management system** – the Organisation is capable of effectively managing OHS by having sufficient employees with the requisite competences at all levels.

## OP1 – WORKER INVOLVEMENT AND INTERNAL CO-OPERATION

### Introductory Notes

Health and safety is governed by both the federal law of the UAE and the law of the Emirate of Dubai. The main law is the Federal Labour Law of 1980 (the Labour Law).

In addition to the federal law, Dubai Municipality has additional Codes of Practice, circulars and technical decisions related to specific health and safety issues.

The Federal Law – Article 91 states: Every employer must provide adequate means of protection for the employee from the hazards of injuries and vocational diseases that may occur during work as well as the hazards of fire and other hazards arising from use of machines and other tools, and he must apply all other means of protection as approved by the Ministry of Labour & Social Affairs, and the employee must use protective equipment and clothing provided to him for such purpose and he must abide by all instructions of the employer aiming at his protection from dangers and must not act in a way that may obstruct the application of said instruction.

Successful Organisations often go further than the law specifies and actively encourages and supports consultation done in different ways.

- Effective Organisations will actively involve the workforce to encourage them to use their knowledge and experience and build commitment to achieving shared objectives.

### Excellence

### OP1

- The Organisation makes full use of its employees' potential and actively involves them to develop.
- The Organisation involves employees at all levels, to gather ideas for improvement, puts these into practice and provides feedback.
- Employees feel empowered to use their knowledge and experience to propose or champion ideas which support continuous improvement.
- Employees show a commitment to exceeding those goals by following existing processes and indicating where they can be improved.

- Collaborative working is recognised as an important way for the Organisation to obtain and share ways of continually improving management of risk.
- Employees are motivated to deliver the Organisation's objectives and demonstrate a consistent understanding of how this is achieved.

#### OC6 Culture

There is a culture of shared values trust, openness and empowerment.

### Predictable

### OP1

- The Organisation regularly consults its workforce in a range of ways, such as through surveys, workshops, meetings with managers and safety tours.
- The Organisation has a process of seeking to involve employees at all levels of the Organisation, and there is a clear structure through which it can communicate this.
- Employees show that they understand how they contribute to achieving the Organisation's goals. That understanding is consistent with the Organisation's relevant policies and vision of the senior team.

- Employees understand the need for change and confirm that they are consulted on how changes are introduced.
- Leaders take responsibility for supporting the establishment and functioning of H&S committees.
- There is consultation during periods of change and employees believe they can have a say in the way the Organisation develops, through collaborative projects.

#### OC6 Culture

Employees believe their views will be listened to and acted upon during times of change.



Standardised	OPI
<ul style="list-style-type: none"> <li>The Organisation has a way of making sure that employees are consulted on H&amp;S matters.</li> <li>The Organisation has established, implemented and maintained processes for employee consultation and participation at all levels in H&amp;S matters.</li> <li>Employees understand how they contribute to the H&amp;S of the Organisation.</li> <li>Employees feel able to make decisions within a goal-setting framework. The Organisation provides the mechanisms, time, training and</li> </ul>	<p>resources necessary for consultation and participation.</p> <ul style="list-style-type: none"> <li>The same systematic approach to involvement and consultation is applied during collaborative and Organisation-only working.</li> </ul> <div data-bbox="778 472 1374 663" style="border: 1px solid black; border-radius: 15px; padding: 10px; background-color: #e0f0e0;"> <p><b>OC6 Culture</b>                      Employees share the Organisation's goals and vision, there are effective arrangements for consulting and participating; and their views will be listened to and acted upon.</p> </div>
Managed	OPI
<ul style="list-style-type: none"> <li>There is some consultation on H&amp;S matters, but it is not carried out in a systematic way, or it does not involve all employees.</li> <li>There is a process for involving staff and consulting, but it is not adopted consistently, frequently it is only with limited sectors of the workforce.</li> <li>People in similar roles apply standards in the same way.</li> <li>Involvement of individuals in collaborative project decision-making is in consistent and depends on the individuals involved.</li> </ul>	<ul style="list-style-type: none"> <li>Employees understand that they are responsible for their own H&amp;S and that of colleagues, but this is not consistent across the Organisation.</li> </ul> <div data-bbox="778 954 1374 1218" style="border: 1px solid black; border-radius: 15px; padding: 10px; background-color: #e0f0e0;"> <p><b>OC6 Culture</b>                      Employees feel that some managers will listen and act on their views, but there is no consistency in the Organisation. The Organisation's goals and vision are generally known about, but not widely understood and respected.</p> </div>
Ad hoc	OPI
<ul style="list-style-type: none"> <li>There is little or no consultation.</li> <li>There is no process for involving employee in H&amp;S matters.</li> <li>Employees do not understand how they contribute to their own H&amp;S and to the safety of the people that they work with.</li> </ul>	<ul style="list-style-type: none"> <li>There is little or no involvement of workers from collaborative Organisations in decision-making during projects.</li> <li>No standards are defined, so none are implemented.</li> </ul> <div data-bbox="815 1536 1374 1753" style="border: 1px solid black; border-radius: 15px; padding: 10px; background-color: #e0f0e0;"> <p><b>OC6 Culture</b>                      Employees feel that senior managers have no interest in their ideas and they do not share a commitment to the Organisation's goals.</p> </div>



## OP2 – COMPETENCE MANAGEMENT SYSTEM

### Introductory Notes

The Organisation is capable of managing H&S effectively by having sufficient employees (including volunteers) with the appropriate competences at all levels.

An Organisation needs to maintain an adequate organisational capability for H&S, including:

- Having the right number of people, in the right place, at the right time with the right competence.
- Ensuring recruitment, training and development systems are able to anticipate and cater for retirements and resignations, especially when there is an ageing workforce and / or a potential skills shortage.
- Understanding the minimum human resource needs to maintain safe operation and particularly to ensure effective risk control during times of organisational change.

A CMS should secure the competence of all those who have roles, responsibilities, authority and accountabilities, within the Organisation’s H&S management system (SMS), at all levels of the Organisation. This includes directors, senior, middle and junior managers, supervisors and front-line workers and volunteers.

#### Excellence

#### OP2

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• The Organisation looks to improve and test its employee competence by using innovative and technological solutions.</li> <li>• The Organisation considers innovative technological solutions, addressing human factors issues, to continuously improve risk control and resilience.</li> <li>• The right people are always in the right place at the right time and there is in-built resilience with some employees competent in both current and next roles.</li> <li>• The CMS is subject to regular monitor, audit and review to ensure that risk controls are continuously improving.</li> </ul> | <ul style="list-style-type: none"> <li>• The Organisation uses employee involvement to gather ideas for improvement and puts them into practice.</li> <li>• The CMS clearly considers operational competences related to safety-critical work, referencing relevant legislation where necessary.</li> <li>• There is a clear and well-defined link between the CMS and the need to maintain necessary organisational capability.</li> </ul> |
|--|---|

#### OC6 Culture

The Organisation makes full use of its employees’ potential and actively involves them through shared values and a culture of trust, openness and empowerment.

#### Predictable

#### OP2

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• There is a comprehensive CMS based on thorough risk assessments of tasks and includes policies on recruitment, selection and training in-line with identified objectives.</li> <li>• There are a range of processes in place to manage organisational competence including succession and resilience planning. Changes to roles are planned.</li> <li>• Employees have required competencies to ensure effective risk control when undertaking safety-critical tasks, including when their role may change.</li> </ul> | <ul style="list-style-type: none"> <li>• Appropriate priority is given to managing competence by sharing resources.</li> <li>• Changes in the risk profile routinely trigger a review of the CMS.</li> <li>• The CMS is proactive and predictive in identifying emerging operational risks associated with safety critical employees and activities.</li> </ul> |
|---|---|

#### OC6 Culture

Employees believe they have a role to play in the CMS and routinely act to support and develop themselves and colleagues.

Standardised	OP2
<ul style="list-style-type: none"> <li>The Organisation has an effective CMS in place. This covers the competencies needed to meet the business's objectives and manage risks; and includes both technical and non-technical skills.</li> <li>There is a process which consistently ensures that the appropriate skills, knowledge and experience are included in the CMS and this leads to effective control of identified and emerging risks.</li> <li>The Organisation provides individuals with the skills, knowledge and experience required and makes full use of the competencies of its employees.</li> </ul>	<ul style="list-style-type: none"> <li>Risk controls repeatedly identify the skills, knowledge and experience needed by individuals to manage the risk.</li> </ul> <div data-bbox="815 405 1374 763" style="background-color: #008000; color: white; padding: 10px; border-radius: 15px;"> <p><b>OC6 Culture</b></p> <p>The value of the CMS is understood by all employees and there is a consistent belief that it will provide them with the necessary competencies to undertake tasks safely and manage risks competently. Employees accept ownership of their own competence and its development.</p> </div>
Managed	OP2
<ul style="list-style-type: none"> <li>There is a CMS, which is linked to the risk profile, but it is inconsistently applied and does not apply to all staff.</li> <li>There are policies on recruitment, selection and training, but they do not always link to the risk profile or are not in-line with the business objectives.</li> <li>Training is provided as and when training needs are identified locally. The right people may not be in the right place, at the right time, to manage the risks.</li> </ul>	<ul style="list-style-type: none"> <li>Risk controls identify the skills, knowledge and experience needed by individuals to manage the risk, but not consistently across the Organisation.</li> </ul> <div data-bbox="815 965 1374 1200" style="background-color: #008000; color: white; padding: 10px; border-radius: 15px;"> <p><b>OC6 Culture</b></p> <p>Employees believe that the competence management system is important for H&amp;S, but effectiveness varies depending on the managers implementing it.</p> </div>
Ad hoc	OP2
<ul style="list-style-type: none"> <li>There is no evidence of any clear approach to managing competence or the system is inappropriate for the risks to be controlled by people.</li> <li>Employees may have the competencies they need, but there are no arrangements to check this.</li> </ul>	<div data-bbox="815 1323 1374 1570" style="background-color: #008000; color: white; padding: 10px; border-radius: 15px;"> <p><b>OC6 Culture</b></p> <p>Employees do not believe they are provided with the necessary information, instruction and training to undertake their roles, which may result in them deviating from procedures and ineffective risk control.</p> </div>

## PI & RCS – PLANNING AND IMPLEMENTING RISK CONTROLS THROUGH CO-ORDINATED MANAGEMENT ARRANGEMENTS

### Purpose

- To make sure that the Organisation has risk controls, that enable it to operate safely.

### Introductory Notes

Safe operation is based on the adequate control of risk. The H&S management system (SMS) needs to set out how decisions are made for the control of risks to ensure legal compliance is achieved in a structured, efficient and effective way. This includes strategy-making, planning and processes for the control of risk.

- **PI1 Risk assessment and management** – there are adequate, appropriate and proportionate methods for identifying hazards and assessing risks as a basis of effective control of H&S risk in the Organisation.
- **PI2 Objective / target setting** – suitable objectives and targets support the motivation of employees in the pursuit of H&S strategies, plans and the implementation of risk controls.
- **PI3 Workload planning** – effective workload planning ensures that the right resources with the right skills are in place at the right time to deliver safe and healthy operation.
- **RCS1 Safe systems of work (including safety-critical work)** – appropriate safe systems of work (SSOW) are developed and implemented for high hazard, safety-critical work to safeguard both those carrying out the work, the integrity of the assets involved and others H&S.
- **RCS2 Management of assets** – assets are managed to ensure that they remain in good condition and can continue to operate reliably within their design parameters.
- **RCS3 Change management, (operational, process, organisational and engineering)** – effective change management ensures that the quantity, frequency and nature of change, (to assets, process or organisation), does not adversely affect H&S management and risk control.
- **RCS4 Control of contractors and suppliers** – selection and control of contractors secures risk control compatible with organisational standards and expectations.
- **RCS5 Emergency planning** – effective emergency planning ensures the mitigation of risk and consequences in foreseeable emergency scenarios.

## PI1 – RISK ASSESSMENT AND MANAGEMENT

### Introductory Notes

There are adequate, appropriate and proportionate methods for identifying hazards and assessing risks as a basis of effective control of H&S risk in the Organisation.

Proportionate, appropriate hazard identification, risk assessment methods, and the design of risk controls are a necessary basis for effective risk management. This includes arrangements which:

- Consider personal as well as process / system risks.
- Are based on the reality of the way work is done and engage employees, (or volunteers) and / or their representatives.
- Recognise the impact of ageing, stretched and fragile assets.
- Recognise the impact of interfaces, shared risks and involve business partners.
- Apply human factors knowledge about behavior and consider both H&S risks; and
- Consider both the risks of performing work and the impact of that work on other risk controls.

#### Excellence

- Risk assessment is used to drive continual improvement in the risk profile of the Organisation.
- The Organisation strives for continuous improvement in risk assessment processes looking at alternative techniques, which challenge the effectiveness of risk controls, by working with other Organisations in their own and other industry sectors.
- The Organisation maintains an external view to identify effective risk controls from other Organisations and other industry sectors.
- The Organisation’s adoption of new and novel techniques in risk management has led to significant risk reductions.

#### PI1

- The Organisation is recognised as an industry-leader in risk management.
- The Organisation leads cross-industry risk reduction programmes.
- Appropriate risk assessment processes are used to make strategic choices related to the totality of the rail infrastructure.

#### OC6 Culture

Employees at all levels seek to learn from others and readily share their knowledge and experience, knowing that this will lead to improved risk control, within their own Organisation and collaborating partners.

#### Predictable

- Risk assessments are integrated throughout the Organisation to make sure there is a systematic approach to risk control, even during periods of change.
- The approach to risk management is embedded and applied consistently throughout the Organisation and enables effective collaboration with stakeholders.
- The risk assessment review cycle is prioritised on a risk-basis.
- Risk management principles are intelligently applied at all levels.

#### PI1

- Removing risk at its source is part of a consistent approach and is reflected in the Organisation’s policies.
- There is evidence of participation in cross-industry risk reduction programmes.

#### OC6 Culture

Risk assessments, including removing risk at its source, are part of the culture of the Organisation; “Risk assessment is how we do things round here”.

Standardised	PI1
<ul style="list-style-type: none"> <li>The Organisation has clear policies on using risk assessments. The Organisation's risk profile has been established. There is clear understanding of what risks will be tolerated.</li> <li>Risk management of system / process risks, as well as individual risk, is used in a consistent way in different parts of the Organisation using quantitative and qualitative techniques proportionate to the risk profile.</li> <li>Control measures in place are those that have been identified by risk assessment.</li> <li>The effectiveness of control measures for both H&amp;S risks are evaluated and proportionate corrective action is taken.</li> </ul>	<ul style="list-style-type: none"> <li>The Organisation makes effective use of the risk control hierarchy (AE/SCNS/NCEMA 6000:2016, Section A.1.5 [6]) and there is evidence that some risks have been eliminated at source.</li> <li>There is evidence of collaboration with other Organisations, where the control of a risk requires action by more than one party.</li> </ul> <div data-bbox="815 568 1382 804" style="background-color: #0070C0; color: white; padding: 10px; border-radius: 15px;"> <p><b>OC6 Culture</b></p> <p>Employees understand the purpose of risk assessment, they are actively involved and see the value of risk assessment in controlling hazards and ensuring their H&amp;S.</p> </div>
Managed	PI1
<ul style="list-style-type: none"> <li>Risk assessments are completed, but there is a lack of consistency on how risk assessments are conducted, with some managers doing better than others.</li> <li>There is a process for risk assessment, but it is not applied consistently across the Organisation.</li> <li>There is some coordination of risk control, but focus is on operational risks and not the complete risk profile.</li> <li>The Organisation uses a range of risk assessment techniques, but not always appropriately to the risk profile.</li> <li>Control measures within an activity do not always include the measures identified by the risk assessment.</li> </ul>	<ul style="list-style-type: none"> <li>Health risk controls rely on lower-level controls from the hierarchy such as personal protective equipment (PPE) and training.</li> <li>There is evidence that the Organisation co-operates with other Organisations to identify and control shared risks, but not consistently.</li> </ul> <div data-bbox="815 1093 1382 1507" style="background-color: #0070C0; color: white; padding: 10px; border-radius: 15px;"> <p><b>OC6 Culture</b></p> <p>Managers recognise that risk assessment is their responsibility, but they frequently use risk assessment to demonstrate that controls already in place are adequate, or to justify not doing more. There is some involvement of employees in the risk assessment process and some understanding by employees as to why it is important.</p> </div>

Ad hoc	PI1
<ul style="list-style-type: none"><li>• Risk assessments are not completed or used to develop effective risk controls relevant to the hazards associated with the Organisation's operations.</li><li>• There is no process to identify the risk profile associated with the Organisation, or to develop and review risk controls.</li><li>• Risk assessments are inappropriate for their intended use.</li><li>• Health risks are not considered by the Organisation.</li></ul>	<ul style="list-style-type: none"><li>• The hierarchy of risk control is poorly used and there is over-reliance on use of information, instruction and training.</li><li>• No evidence of collaboration over the improved control of shared risks.</li></ul> <div data-bbox="815 479 1385 869"><p><b>OC6 Culture</b></p><p>There is widespread evidence that the risk control hierarchy is not understood by employees at many levels in the Organisation. Managers / supervisors think it is someone else's job to carry out risk assessments. Employees see risk assessment as a bureaucratic process getting in the way of them doing their job.</p></div>

## PI2 – OBJECTIVE/TARGET SETTING

### Introductory Notes

Suitable objectives and targets support the motivation of employees in the pursuit of H&S strategies, plans and the implementation of risk controls. H&S objectives need to be ‘specific, measurable, and agreed with those who deliver them, realistic and to a suitable timescale’ (SMART). Both short and long-term objectives should be set and prioritised alongside wider Organisation objectives. Objectives at different levels or parts of an Organisation, should be aligned so they support the overall objectives of the Organisation’s H&S policy. Personal targets can also be agreed with individuals to help ensure the objectives are met. Objectives and targets are a means of providing motivation and incentives and a basis of rewarding success for good risk control. They should be set carefully to avoid:

- Conflicts with other business objectives.
- Perverse behaviors leading to unintended consequences such as under reporting of incidents, or activity to control one risk to the detriment of another.

An objective is defined as the desired end point. A target is a measurable step taken towards achievement of an objective.

#### Excellence

#### PI2

- The management of performance is measured against that of others, within and outside the rail industry, to drive continual improvement.
- There is a commitment to continuous improvement backed by performance targets for managers and board members.
- Achievement or non-achievement is recorded and used to help with continual improvement.
- Performance objectives are challenging and reviewed to demonstrate continuous improvement in H&S achievements.

- Mutual performance standards are set for collaborative relationships and these are recognised to drive continuous improvement.

#### OC6 Culture

Organisations can demonstrate a coherent cascade of objectives against delivery of continual improvement, in a balanced suite of performance objectives, such that they create an evident culture of continual improvement through the use of process, plant and people development.

#### Predictable

#### PI2

- Objectives are SMART, prioritised and in line with each other to support the overall policy.
- The H&S management system makes sure that targets are set, and achievement is measured.
- The Organisation plans to achieve H&S objectives and these plans determine; what will be done; what resources are required; who is responsible, when it will be completed; how the results will be evaluated and how actions will be completed.

- The importance of performance targets for H&S is recognised and achievements rewarded.
- Systems are in place to follow up on non-achievement

#### OC6 Culture

The Organisation incentivises the delivery of objectives, but does not fully understand if the objectives have made a substantial change to the capability of the Organisation to deliver sustained H&S control.



Standardised	PI2
<ul style="list-style-type: none"> <li>H&amp;S performance targets and objectives are set.</li> <li>Attempts are made to achieve SMART objectives and to prioritise objectives and targets and bring them in-line with each other.</li> <li>Systems are in place to follow up on achievement.</li> <li>Achievement of objectives is not well aligned to the review process.</li> </ul>	<ul style="list-style-type: none"> <li>Objectives include performance standards for collaboration internally and with external Organisations, such as contractors, etc.</li> </ul> <div data-bbox="820 409 1374 573" style="background-color: #0070C0; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>Individuals expect to be held accountable to fair, clear and achievable objectives.</p> </div>
Managed	PI2
<ul style="list-style-type: none"> <li>There are objectives. Some may be SMART and prioritised, but team and individual objectives within different parts of the Organisation are not aligned and do not always support the objectives of the Organisation’s overall policies.</li> <li>Personal targets are not related to the objectives of the Organisation’s overall policies.</li> <li>Failure to meet targets or objectives is tolerated.</li> </ul>	<ul style="list-style-type: none"> <li>No consistent application of standards of any performance standards that do exist.</li> <li>The Organisation does not have a consistent approach to the setting of objectives for collaborative situations. This results in an incoherent inter-organisational approach with conflicting priorities.</li> </ul> <div data-bbox="820 936 1374 1099" style="background-color: #0070C0; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>Individuals expect to be held accountable to fair, clear and achievable objectives.</p> </div>
Ad hoc	PI2
<ul style="list-style-type: none"> <li>There are few or no H&amp;S targets set for the Organisation.</li> <li>Any targets which do exist are not SMART or prioritised or aligned to the risk profile.</li> <li>No clear idea of performance of individuals involved in the SMS.</li> </ul>	<ul style="list-style-type: none"> <li>No effective application of standards for setting performance targets.</li> <li>No performance targets set for collaborative ventures or joint-risk management with contractors, other operators, etc.</li> </ul> <div data-bbox="820 1339 1374 1541" style="background-color: #0070C0; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>The assumption is that individuals must be delivering if the Organisation is still operating but there is no evidence to back this up.</p> </div>

## PI3 – WORKLOAD PLANNING

### Introductory Notes

Effective workload planning ensures that the right resources, with the right skills (with the right equipment) are in place, at the right time, to deliver safe and healthy operation.

Good planning will significantly improve the way an Organisation manages H&S by making sure there are the right resources to carry out tasks. This will lead to effective risk control and efficient working.

Planning should be realistic drawing on human factors, to ensure that work demands do not exceed human capabilities.

#### Excellence

#### PI3

- The Organisation looks beyond its organisational boundaries for factors which may impact on its workload planning.
- The Organisation collaborates with others to achieve continuous improvement in planning systems of all collaborating parties.
- The workload planning system supports a healthy lifestyle for the individual balanced against delivering the Organisation’s objectives, efficiently.
- The Organisation actively seeks out best practice in managing workloads and implements ideas that enable continuous improvement in risk management.
- Active pursuit of best practice which is implemented even when planning the workloads of collaborative teams.

#### OC6 Culture

Employees at all levels feel they are able to influence their own work plan, have active involvement in planning additional work and that there is a healthy balance between their needs and those of the Organisation.

#### Predictable

#### PI3

- The planning system includes regular reviews of workload and resources, both within the Organisation and the supply chain.
- When major projects and changes occur, the workload planning system is designed to ensure that nobody is overloaded with work.
- The fatigue management system is part of a comprehensive H&S management system and applied to all staff at all levels of the Organisation. Even when there is extra work or changes, nobody becomes overloaded with work.
- Standards reviewed following changes to workloads or tasks.
- Effective workload planning system includes changes to workloads, or task content, including collaborative project teams.

#### OC6 Culture

Employees actively support managers over workload planning and resource management and feel that their ideas and concerns are valued and will be acted upon.

#### Standardised

#### PI3

- A planning system is in place to make sure that tasks are given to the correct person and can be completed on time.
- The Organisation determines; what will be done; what resources are required; who is responsible and when it will be completed.
- The resource management system captures work and travel hours to be recorded to identify / monitor excessive hours worked.
- The fatigue management system considers activity, workload, environment and travel, but is principally focused on operational employees.
- The Organisation determines and provides the resources needed for the establishment, maintenance and continual improvement of the SMS.
- Standards identified and used effectively.
- Effective use of systematic workload planning, leading to effective risk management, including collaborative work teams.

	<p><b>OC6 Culture</b>                  Employees feel that resources and workload are aligned and reasonable. They are comfortable to challenge managers about additional tasks, particularly when related to safety critical activities. Employees accurately record the hours they work including travelling for work.</p>
<p style="text-align: center;"><b>Managed</b></p> <ul style="list-style-type: none"> <li>• Workloads vary, but some thought has been given to allocating tasks in a way that aims to reduce overloading.</li> <li>• There is a process to identify and prioritise safety-critical tasks, but workloads are not reviewed to manage areas of overloading.</li> <li>• There is a simple process of looking at hours and shift patterns to manage workload-related health issues.</li> <li>• Safety-critical tasks are mostly completed effectively.</li> <li>• There is some monitoring of workloads, but people still become overloaded, leading to failures in risk control.</li> </ul>	<p style="text-align: center;"><b>PI3</b></p> <ul style="list-style-type: none"> <li>• Standards to reduce fatigue identified but used inconsistently.</li> <li>• Inconsistent application of workload planning to collaborative projects dependent on individuals not systems.</li> </ul> <p><b>OC6 Culture</b>                  Employees recognise the importance of safety-critical tasks. There is some challenge of managers by employees where there is inadequate resource. Managers accept that working excessive hours is just part of the job and will tend to under report the hours they work.</p>
<p style="text-align: center;"><b>Ad hoc</b></p> <ul style="list-style-type: none"> <li>• There is little or no control of workloads.</li> <li>• There is no effective process for managing workloads.</li> <li>• There is evidence that poor performance in carrying out tasks is due to not enough time being given and tasks which are critical to safety not being prioritised properly.</li> <li>• Some people are overloaded, while others are lightly loaded</li> </ul>	<p style="text-align: center;"><b>PI3</b></p> <ul style="list-style-type: none"> <li>• No standards identified and used.</li> <li>• No effective workload planning for collaborative work.</li> </ul> <p><b>OC6 Culture</b>                  There is a culture of accepting tasks that are allocated, without challenging, even if this results in becoming overloaded and non-completion of tasks. Managers think it is acceptable to employee to work excessive hours.</p>

## RCS1 – SAFE SYSTEMS OF WORK (INCLUDING SAFETY CRITICAL WORK)

### Introductory Notes

Appropriate safe systems of work (SSOW) are developed and implemented for high hazard, safety-critical work, to safeguard both those carrying out the work, or affected by it, and the integrity of the assets involved. The focus of this criteria is to evaluate an organisation’s ability to identify risks relating to specific tasks and put appropriate controls in place to protect the H&S of those carrying out and affected by those tasks.

#### Excellence

- There is a commitment to continually improve SSOW by, for example, benchmarking within and outside of the rail industry.
- The Safe System of Work (SSOW) have the best possible blend of processes, plant and people to achieve excellent results, delivered efficiently and safely.
- The SSOW are shared with industry and are recognised as excellent by outside Organisations.

#### RCS1

- Consistent use and continual improvement of shared SSOW and active sharing of good practice, for example at conferences.

#### OC6 Culture

The culture is one where everyone across the organisation is actively seeking improvement, identifying, deploying and sharing best practice from all relevant sources.

#### Predictable

- The SSOW are used to both implement risk controls and get feedback on how adequate they are.
- Changes to the SSOW are checked carefully and are well-managed. They produce the result that was predicted and planned for, before the change was made.
- Standards are maintained even after changes to SSOW. Consistency is clearly evident across departments and projects.

#### RCS1

- Extensive consultation is carried out with those using and those affected by the SSOW. Shared SSOW are subjected to the same processes as the Organisation's own ones.

#### OC6 Culture

The culture involves a mature and integrated approach, with a carefully managed library of SSOW based on robust risk assessments.

#### Standardised

- There is a clear, consistent approach to developing and putting in place SSOW that use effective risk management.
- The tasks, including ones critical to H&S, are clearly understood and can be repeated across sites and shifts.

#### RCS1

- Standards are applied consistently across the Organisation in the management of SSOW.
- Collaborating parties consistently use shared SSOW.

#### OC6 Culture

The culture of risk management is mature, effectively using and improving existing safe SSOW.

Managed	RCS1
<ul style="list-style-type: none"><li>• SSOW are in place, but there are clear differences in how they are applied across the Organisation.</li><li>• The SSOW are sometimes less than adequate because the procedures cause mistakes or are not effective in achieving the intended result.</li><li>• There is inconsistent compliance with standards across departments and areas of work.</li></ul>	<ul style="list-style-type: none"><li>• SSOW are not used consistently between collaborating parties.</li></ul> <div data-bbox="815 376 1385 618"><p><b>OC6 Culture</b></p><p>The culture is to use what is available for a specific task or area, but in isolation, not learning from elsewhere or sharing good practice.</p></div>
Ad hoc	RCS1
<ul style="list-style-type: none"><li>• The SSOW actually used are not the same as the written procedures.</li><li>• The SSOW do not take account of risk, and tasks that are critical to H&amp;S are not always identified and prioritised.</li><li>• No or only weak evidence of application of standards.</li></ul>	<ul style="list-style-type: none"><li>• SSOW are not coordinated with those of collaborators.</li></ul> <div data-bbox="815 768 1385 965"><p><b>OC6 Culture</b></p><p>The culture is reactive, using SSOW inconsistently and not communicating the requirements using a systematic approach.</p></div>

## RCS2 – MANAGEMENT OF ASSETS

### Introductory Notes

Assets are managed to ensure that they remain in good condition and can continue to operate reliably within design parameters.

Successful management of assets involves:

- Identifying the assets, the Organisation owns and manages.
- Having systems in place to make sure that assets remain in a good condition and capable of operating reliably within design parameters.

Suitable predictive maintenance techniques should be employed where appropriate. The condition and life expectancy of assets should be factored into maintenance and renewal decisions. Asset condition and life expectancy should be factored into enhancement project thinking to ensure that a balance is struck between safety, performance and efficiency in investment decisions.

#### Excellence

#### RCS2

- Information on work history type and cost, condition and performance are recorded at asset component level.
- Systematic and fully optimised data collection programme is in place with supporting metadata.
- There is evidence of an effective pro-active and predictive maintenance regime across the Organisation.
- Enterprise-level guidelines and standards are in place with best practices incorporated from other industries.

- There is clear evidence of searching for best practice in asset management and condition monitoring as part of the drive to continuous improvement.

#### OC6 Culture

There is a demonstrable alignment between asset management objectives, systems and individual responsibilities at all levels and across the Organisation.

#### Predictable

#### RCS2

- A reliable register of physical, financial and risk attributes are recorded in a system with data analysis and reporting functionality.
- Systemic and documented data collection processes are in place.
- The Organisation has successfully implemented a condition-based, preventative maintenance regime that is effective.
- There is a governance plan in place which is continuously reviewed and updated to incorporate learning from the Organisation’s asset management activities.

- Changes to frequencies or content of examinations are communicated to collaborator Organisations to ensure that joint assets are correctly maintained.
- Audit is used by all parties in collaborative activities, individually and jointly.

#### OC6 Culture

The Organisation is structured to support effective asset management and the importance of this is understood by everyone. There is a consistent approach to asset management across the Organisation.

Standardised	RCS2
<ul style="list-style-type: none"> <li>The data held by the Organisation is sufficient to support prioritisation of asset management programmes (criticality).</li> <li>Asset hierarchy, identification and attribute systems are documented, and appropriate metadata is held.</li> <li>Maintenance is conducted against a periodic maintenance plan, which is in the most part achieved.</li> <li>There are standards in place for each asset type.</li> </ul>	<ul style="list-style-type: none"> <li>Joint assets are part of the asset management system.</li> </ul> <div data-bbox="815 376 1382 645" style="border: 1px solid black; border-radius: 15px; padding: 10px;"> <p><b>OC6 Culture</b>                      The Organisation’s leadership own and visibly support the asset management programme. There is an awareness at all levels of the Organisation of the importance of asset management in managing system safety.</p> </div>
Managed	RCS2
<ul style="list-style-type: none"> <li>Asset management is inconsistent across the Organisation.</li> <li>Basic physical information for assets is held in a spreadsheet or other simple system, but is typically based on broad assumptions, or it is incomplete.</li> <li>There is evidence of a generally reactive approach to maintenance across the Organisation. Where maintenance is planned, there is widespread evidence of backlog.</li> <li>The standards in place in the Organisation are generally those defined by the original equipment</li> </ul>	<p>manufacturer (OEM) / asset vendors.</p> <ul style="list-style-type: none"> <li>Some joint assets are included in the asset management system, but no consistency.</li> </ul> <div data-bbox="815 824 1382 1115" style="border: 1px solid black; border-radius: 15px; padding: 10px;"> <p><b>OC6 Culture</b>                      Asset management functions are carried out by small groups. Roles reflect asset management requirements. Understanding of the importance of asset management is typically limited to individuals directly involved.</p> </div>
Ad hoc	RCS2
<ul style="list-style-type: none"> <li>There is a general awareness of the need to manage assets to maintain their integrity and to hold an asset register.</li> <li>Asset information is held in multiple formats.</li> <li>Equipment is repaired when it fails. There is little evidence of planned preventative maintenance (PPM).</li> </ul>	<ul style="list-style-type: none"> <li>There are no defined standards for asset management.</li> <li>Shared assets are not maintained proactively</li> </ul> <div data-bbox="815 1350 1382 1485" style="border: 1px solid black; border-radius: 15px; padding: 10px;"> <p><b>OC6 Culture</b>                      There is little recognition that asset management is important.</p> </div>



## RCS3 – CHANGE MANAGEMENT (OPERATIONAL, PROCESS, ORGANISATIONAL AND ENGINEERING)

### Introductory Notes

Effective change management is proactive and secures the quantity, frequency and nature of change, (to assets, operation, process or Organisation), does not adversely affect H&S management and risk control. All individual changes need to be managed to prevent adverse impact on the SMS) and control of risk. This includes risk arising from the process of change itself, as well as the new end-state. Appropriate methods of risk assessment should be employed where appropriate. The total amount and pace of change should be managed to ensure the collective impact does not adversely affect safety performance.

#### Excellence

#### RCS3

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• There is an understanding that change can affect other aspects of an organisation’s business or other Organisations with shared accountabilities this leads to business risk being linked with H&amp;S risk during and as a result of any change.</li> <li>• All employees are fully conversant with the change management process and there is no need for a dedicated change management team, changes lead towards continuous improvement.</li> <li>• Changes which are implemented, only ever reduce the Organisation’s overall risk profile and seek continuous improvement.</li> <li>• The Organisation actively seeks improvements to standards of change management to drive continuous improvement.</li> </ul> | <ul style="list-style-type: none"> <li>• The Organisation actively seeks collaborators to assist in driving continuous improvement in management of change.<br/>There is a clear review process in place that analyses the effectiveness of changes as and when they take place.</li> </ul> |
|---|---|

#### OC6 Culture

Employees feel that all changes which are implemented have an overall positive effect upon themselves and the Organisation.

#### Predictable

#### RCS3

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>• The change process requires a review to be carried out after a change, which is structured to consider the wider implications of the change including the effect the change has had on the culture of the Organisation.</li> <li>• There is an efficient and effective change management process, which considers the wider impact of change including the impact on other Organisations.</li> <li>• All changes are well managed and their risks well controlled.</li> <li>• Organisational standards for management of change exist and are uniformly applied.</li> </ul> | <ul style="list-style-type: none"> <li>• Effective control of change extends to cross-organisational change involving collaborators and includes effective information transfer post-change on H&amp;S performance.</li> </ul> |
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#### OC6 Culture

The importance of involving employees in the change process is recognised to bring benefits and those employees are actively involved, because they understand the importance of managing change and the role they play in that Organisation.

Standardised	RCS3
<ul style="list-style-type: none"> <li>• There is an efficient approach to managing any process, technical, operational or organisational changes, engaging staff in the process.</li> <li>• There is a structured approach to change, involving a number of steps and a defined process in the management system.</li> <li>• There is a consistent approach to risk assessment and risk control after a change is made.</li> <li>• Organisational standards for management of change exist and are uniformly applied.</li> </ul>	<ul style="list-style-type: none"> <li>• Standards include clear processes for managing changes involving collaborators and these are applied.</li> <li>• Risk assessments consider human performance.</li> </ul> <div data-bbox="815 472 1385 741" style="background-color: #0070C0; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>Employees recognise the importance of effective change management, but still feel that changes are often implemented without proper consideration of the impact on their safety and/or health.</p> </div>
Managed	RCS3
<ul style="list-style-type: none"> <li>• The importance of change management is understood and there is some degree of control over all types of change or inconsistent types of control over different types of change (technical, operational, organisational).</li> <li>• There is a process for managing change, but it is either not used consistently, or it is not effective at managing the risks following a change.</li> <li>• Some changes are made without their risks being controlled.</li> <li>• Some departments have standards for change management, but not all, and even those that exist are inconsistently applied.</li> </ul>	<ul style="list-style-type: none"> <li>• Inconsistent involvement of collaborator Organisations in the management of changes, depending on individuals involved not systematic process.</li> </ul> <div data-bbox="815 943 1385 1189" style="background-color: #0070C0; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>Some employees recognise the importance of a systematic approach to change, but this is inconsistent and depends on the individual's experience.</p> </div>
Ad hoc	RCS3
<ul style="list-style-type: none"> <li>• There is little, or no control of change and changes are made without effective consideration of their risks or their wider impacts.</li> <li>• There is no process or system for making changes, which leads to risks not being identified or controlled following a change.</li> <li>• The risks associated with a change are not identified and so are not controlled.</li> </ul>	<ul style="list-style-type: none"> <li>• No organisational standards for managing change exist, so none are applied.</li> <li>• There is little or no involvement of collaborator Organisations in managing change, even to shared processes or risks.</li> </ul> <div data-bbox="815 1529 1385 1704" style="background-color: #0070C0; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>Employees feel that the effect of change on their safety and/or health is not considered.</p> </div>

## RCS4 – CONTROL OF CONTRACTORS AND SUPPLIERS

### Introductory Notes

Organisations need to effectively manage the H&S of their contractors and suppliers and those affected by their activities, wherever those activities are carried out.

Maintaining a sound intelligent customer capability is essential, to ensure the Organisation retains understanding and knowledge of the products or services being supplied by the range of contractors. Some key features of effective contractor / supplier control are:

- Selection (including resources, equipment, knowledge and experience).
- Co-ordination between clients, contractors and sub-contractors (i.e., who does what, when and how).
- Induction to site rules, procedures, hazards and emergency arrangements.
- Supervision (by whom – including on-the-job and checks of completed work).
- Competence of contractors (e.g., consider the role of the client and the contractor’s management).
- Assessment of new hazards introduced by the activities of contractors – which could be direct (e.g., in the case of asbestos removal), or indirect (e.g., caused by undetected, latent faults left behind when a contractor completes work).
- Review of the contractor selection and management system.

#### Excellence

- The contractor supply chain seamlessly delivers all of the Organisation’s objectives.
- Effective processes exist for pre-qualification, selection, induction, management and post-contract review of contractors. These processes are under continual review and improvement.
- The contractor’s / supplier’s main H&S activities are in line with the Organisation’s.
- The process is consistently applied and measured for effectiveness. There is evidence of formal audit, and of measurable continuous improvement delivering tangible benefits.

#### RCS4

- The contractor / supplier collaborates seamlessly with the Organisation and customer, all parties operate inter-dependently for mutual benefit. Evidence of transparent and effective two-way communication.
- The Organisation maintains an intelligent customer capability for contractor selection, control and management.

#### OC6 Culture

A culture of openness and mutual trust and respect exists in which the boundary between contractor and Organisation is seamless, and values and objectives are shared.

Predictable	RCS4
<ul style="list-style-type: none"> <li>• There is a systematic approach to contractor / supplier control.</li> <li>• Effective pre-qualification arrangements take a balanced approach, considering H&amp;S performance. Effective processes exist for the ongoing management of contractors at all stages of the relationship.</li> <li>• There is a clear understanding of responsibility at all stages of the contract. Good working relationships between client and all contractors, are delivered through effective interface arrangements.</li> </ul>	<ul style="list-style-type: none"> <li>• Performance measures and post-contract reviews help guide decisions on the choice of contractors for further work.</li> <li>• The contractor / supplier collaborates effectively with the Organisation. Evidence of effective two-way communication.</li> </ul> <div data-bbox="815 506 1385 741" style="background-color: #0070C0; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b> A culture exists in which communication is open and honest. The integration between contractor / supplier and the Organisation is strengthened through collaboration and sharing of objectives.</p> </div>
Standardised	RCS4
<ul style="list-style-type: none"> <li>• The importance of contractor control is recognised and this is reflected in the Organisation’s relevant policy and process, but measurement of the effectiveness of the process may be lacking.</li> <li>• There is robust evidence of induction and communication with contractors.</li> <li>• Contractors are closely aligned with the customers’ expectations.</li> <li>• The contractor’s performance is monitored during the contract, and appropriate performance measures are used effectively to track achievement.</li> </ul>	<ul style="list-style-type: none"> <li>• The contractor’s performance is monitored during the contract, and appropriate performance measures are used effectively to track achievement.</li> <li>• Comprehensive processes exist to ensure that contractors are chosen on their ability to complete work safely and to a satisfactory standard and managed effectively following appointment.</li> </ul> <div data-bbox="815 1093 1385 1328" style="background-color: #0070C0; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b> A culture exists in which communication is open and honest. The contractor and Organisation are still distinct, but there is some evidence of collaboration and sharing of objectives.</p> </div>
Managed	RCS4
<ul style="list-style-type: none"> <li>• Some elements of a risk control system are in place for contractor control, but there is no systematic process from selection through to post-contract review.</li> <li>• There is some evidence of induction of and communication with contractors.</li> <li>• Contractors are broadly aligned with the customers’ expectations.</li> <li>• There is some evidence of a managed process in the initial selection, monitoring, and post-contract review, but application may be inconsistent.</li> </ul>	<ul style="list-style-type: none"> <li>• The key elements of the contractor relationship are managed through formal processes.</li> <li>• The contractor is loosely managed by the Organisation but operates mostly as an independent entity.</li> </ul> <div data-bbox="815 1592 1385 1821" style="background-color: #0070C0; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b> A ‘contractual’ culture exists in which communication is open and honest but the contractor / supplier and Organisation are clearly separated.</p> </div>

Ad hoc	RCS4
<ul style="list-style-type: none"><li>• Contractors and suppliers are appointed when needed, but when selected there are few considerations other than cost.</li><li>• There is no formal process for managing contractors / suppliers, monitoring their performance or review of the completed contract.</li><li>• There is little evidence of integration of contractors / suppliers with the Organisation, and consequently a lack of shared objectives and values.</li></ul>	<ul style="list-style-type: none"><li>• There is little consideration of the responsibilities for risk control when deciding how to do the work.</li></ul> <div data-bbox="815 405 1385 645"><p><b>OC6 Culture</b></p><p>An ‘us and them’ culture exists. The contractor / supplier is blamed for operational failings. The Organisation is blamed by the contractor / supplier for lack of information / management.</p></div>

## RCS5 – EMERGENCY PLANNING

### Introductory Notes

Effective emergency planning ensures the mitigation of risk and consequences in foreseeable emergency scenarios.

The overall aim of emergency planning is to make sure that appropriate measures will be used when and where necessary to prevent or reduce the harmful effects of major accidents.

#### Excellence

#### RCS5

- The Organisation proactively looks outward when planning emergency response to identify and use good practice in a spirit of continuous improvement.
- Emergency response arrangements are in place and reflect good practice from both within and outside the rail industry.
- Lessons from published reports are included in procedure reviews and incorporated into revised emergency procedures.

- The Organisation actively seeks to find and share more effective ways of dealing with emergencies.
- Information sharing is fully collaborative both with direct collaborating Organisations and others with relevant information and / or experience.

#### OC6 Culture

Culture of striving for continual improvement in response to all emergencies.

#### Predictable

#### RCS5

- Emergency responses are developed and reviewed in response to developing risks and emergency scenarios.
- Feedback from exercise 'wash-ups' is taken into account when procedures are reviewed to make sure emergency responses remain up to date and effective.
- The full suite of emergency arrangements have been assessed so that appropriate risk reduction strategies are evident should they be realised. Feedback from exercise 'wash-ups' is taken into account when procedures are reviewed to make sure emergency responses remain up to date and effective.

- Changes to the emergency response procedures are based on evidence from experience and demonstrably lead to improvements.
- Collaborative Organisations are fully involved in wash-up sessions including reviews of procedures.

#### OC6 Culture

Culture of making the best possible response if an emergency occurs.

Standardised	RCS5
<ul style="list-style-type: none"> <li>• Potential emergencies arising from tasks are identified as part of risk assessments.</li> <li>• Control measures, including training and resources, are in place to deal with emergencies.</li> <li>• The Organisation determines and provides the resources needed to support the emergency planning arrangements.</li> </ul>	<ul style="list-style-type: none"> <li>• The Organisation recognises that emergency planning is a critical part of the business and is applying the appropriate standards.</li> <li>• Joint emergency response exercises take place with other Organisations involved in a task. Roles in emergency response are clear and understood.</li> </ul> <div data-bbox="815 539 1377 707" style="background-color: #0070C0; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>The culture is to recognise and plan for effective emergency responses.</p> </div>
Managed	RCS5
<ul style="list-style-type: none"> <li>• The Organisation realises that emergency responses are an important part of a risk control system.</li> <li>• Major emergencies that could arise are identified and there are some plans in place to deal with them.</li> <li>• Emergency responses are the responsibility of departments or divisions of the Organisation.</li> </ul>	<ul style="list-style-type: none"> <li>• The Organisation applies basic requirements to the plans for major emergencies that could arise.</li> <li>• Emergency procedures requiring multi-agency response are recognised, but there is no structured planning of responses required.</li> </ul> <div data-bbox="815 981 1377 1193" style="background-color: #0070C0; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>Emergency responses are developed locally and owned by individual departments or sites, rather than being jointly developed and coordinated.</p> </div>
Ad hoc	RCS5
<ul style="list-style-type: none"> <li>• There is no organised identification of possible emergencies and how to respond if they arise.</li> <li>• The Organisation relies on the emergency services to deal with all aspects of an emergency.</li> <li>• The Organisation does not consider the risks or the consequences of possible emergencies on the business or its workforce.</li> </ul>	<ul style="list-style-type: none"> <li>• The Organisation does not apply standards to support emergency planning or arrangements.</li> <li>• There is no consideration of the need for coordinated responses with other Organisations in the event of major incidents requiring joint responses.</li> </ul> <div data-bbox="815 1480 1377 1760" style="background-color: #0070C0; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>The culture is that there is a recognition that major emergencies could occur, but no planning is undertaken to deal with specific ones; a generic emergency response is thought to be enough.</p> </div>



## MRA – MONITORING, AUDIT AND REVIEW

### Purpose

The aim is to make sure that risk controls are in place, working correctly and achieving the Organisation’s objectives.

### Introductory Notes

Organisations need to measure, audit and review the implementation and effectiveness of all parts of the SMS. This is the basis of feedback, learning and continuous improvement.

**Monitoring** – organisations need to measure the effectiveness of risk controls to make sure that risk controls are identified and work in practice. Safe systems of work (SSOW) must be monitored to make sure they are appropriate and are actually being followed. Systems for monitoring, auditing and reviewing performance should be in place to make sure that the H&S management system (SMS) is working correctly.

**Audit** – an audit checks that the Organisation is doing what it says it will do. It should be supported by regular reviews to make sure that the Organisation’s business objectives are correct.

**Review** – the review should also check that the arrangements put in place to meet the business objectives are working as intended. Monitoring, audit and review form a feedback loop within the overall SMS and are an essential part of programmes for continual improvement and achieving excellence.

#### The Criteria in this section include:

**MRA1** – Proactive monitoring arrangements – proportionate, targeted monitoring before an accident or incident to provide feedback on the implementation of strategies and plans, and the effectiveness of the SMS arrangements essential to motivate and reward success in risk control.

**MRA2** – Audit – Independent, systematic audits check that risk-control systems and management arrangements within the SMS are effective.

**MRA3** – Incident investigation – proportionate investigation of accidents, incidents and near misses is essential to learn from adverse events.

**MRA4** – Management review – review at appropriate levels to ensure that policies, strategies and plans remain appropriate and effective in the face of feedback from monitoring, investigations and audit findings.

**MRA5** – Corrective action – Corrective action through change management programmes secure the proportionate, prioritised close out of actions arising from monitoring, investigations, audits and reviews.

## MRA1 – PROACTIVE MONITORING ARRANGEMENTS

### Introductory Notes

Proportionate, targeted monitoring before an accident or incident to provide feedback on the implementation of strategies and plans, and the effectiveness of the H&S management system (SMS) arrangements essential to motivate and reward success in risk control.

Monitoring provides managers with confidence that risk control measures identified in risk assessment are in place and working as intended to control risk before something goes wrong. This includes hardware controls, work systems and practices controlling risks. For example, train dispatch arrangements at the platform train interface (PTI), or maintenance procedures for relief valves in process industries. Monitoring should be proportionate to the hazards / risk and include:

- **Critical systems** (those relied upon to prevent a serious risk outcome being realised).
- **Vulnerabilities** – those systems with a tendency to degrade over time, (such as controls with a large human input, for example train dispatch and valve maintenance, and those for which current performance is not being implemented well).

Sampling cultural characteristics. and a mixture of:

- **Activity / process** measures (doing something, e.g., number of valves maintained); and
- **Outcome** measures result (for example number of valves passing examination).

Suitable analysis of the results of monitoring assists in identifying common underlying issues and systemic problems. Choosing the correct monitors is important; “measure what is important, don’t make important what you can measure.

#### Excellence

- Active steps are taken to identify, evaluate and utilise novel ways of monitoring to achieve continuous improvement in risk control.
- Managers actively participate in industry-wide and cross-industry groups to improve risk control monitoring techniques e.g., remote condition monitoring.
- The Organisation is an early adopter of new standards relating to monitoring and recognised as an 'early complier' Organisation.
- The Organisation has closely linked outcome and activity indicators which demonstrate risk controls are optimised.
- The Organisation is known for mature relationships with collaborators who strive to work again with the Organisation as they are assured that risks will be controlled.

#### MRA1

- Across the Organisation monitoring activities are recognised as vital in improving risk control.
- The monitoring arrangement address proportionately and appropriately all the processes and systems within the SMS to ensure their implementation, adequacy and effectiveness.

#### OC6 Culture

Monitoring is understood to be a key part of assurance and component of continuous improvement.

<p style="text-align: center;"><b>Predictable</b></p> <ul style="list-style-type: none"> <li>• Change processes ensure that risk-based monitoring is in place following a change.</li> <li>• Managers and supervisors are well-trained and have the necessary resources, and there is evidence of challenge of SSOW (see RCS1).</li> <li>• Monitoring remains key to understanding risk control, even in times of change.</li> </ul>	<p style="text-align: center;"><b>MRA1</b></p> <ul style="list-style-type: none"> <li>• Monitoring is reviewed to ensure continuing compliance with standards.</li> <li>• The outcomes of monitoring are shared with collaborators to ensure mutual assurance of the effectiveness of risk controls.</li> </ul> <div style="background-color: #4a4a8a; color: white; padding: 5px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>Monitoring of risk controls is part of the way risk is managed, including during periods of change.</p> </div>
<p style="text-align: center;"><b>Standardised</b></p> <ul style="list-style-type: none"> <li>• There is a systematic approach to monitoring, based on published guidance.</li> <li>• Monitoring flows from the risk assessment, and all risk controls are monitored in a systematic way across the Organisation.</li> <li>• The Organisation has established, implemented and maintained processes for monitoring, measurement, analysis and performance evaluation. Including, the extent to which legal and other requirements are fulfilled, progress towards achievement of H&amp;S objectives, the effectiveness of operational and other controls. These systems apply to collaborative working too.</li> </ul>	<p style="text-align: center;"><b>MRA1</b></p> <ul style="list-style-type: none"> <li>• Management receives information from monitoring activities that allows them to have assurance that key risk controls are in place and working as intended.</li> <li>• Monitoring is compliant with the requirements of CSM for Monitoring or ISO 45001:2018.</li> </ul> <div style="background-color: #4a4a8a; color: white; padding: 5px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>The importance of monitoring risk controls is understood and the right things are measured, giving assurance of the effectiveness of risk controls. Monitoring provides feedback and positive motivation /reward.</p> </div>
<p style="text-align: center;"><b>Managed</b></p> <ul style="list-style-type: none"> <li>• Some risk controls are monitored, but there is no systematic approach to monitoring.</li> <li>• Monitoring is not a systematic process; records of monitoring activities are not coordinated and there is evidence that adverse outcomes are not actioned.</li> <li>• There are inconsistencies between different areas of the business in the way monitoring is done and the action taken in response to the outcomes of monitoring.</li> </ul>	<p style="text-align: center;"><b>MRA1</b></p> <ul style="list-style-type: none"> <li>• Most people in the Organisation understand the need to monitor risk controls.</li> <li>• Some risk controls for collaborative working are monitored but there is no systematic approach to monitoring.</li> </ul> <div style="background-color: #4a4a8a; color: white; padding: 5px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>Some monitoring is undertaken, but it is not risk-based and any assurance obtained from it is purely by chance.</p> </div>
<p style="text-align: center;"><b>Ad hoc</b></p> <ul style="list-style-type: none"> <li>• There is little or no monitoring, so little understanding of whether risk controls are in place or are working effectively.</li> <li>• There is no evidence that risk controls are monitored.</li> <li>• There is little, or no data analysis done to inform the Organisation that monitoring is needed to ensure that risk controls are in place and effective.</li> </ul>	<p style="text-align: center;"><b>MRA1</b></p> <ul style="list-style-type: none"> <li>• Little or no monitoring of risk controls needed for collaborative working.</li> </ul> <div style="background-color: #4a4a8a; color: white; padding: 5px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>There is little or no evidence of understanding why risk controls must be monitored.</p> </div>

## MRA2 – AUDIT

### Introductory Notes

Independent, systematic audits check that risk-control systems and management arrangements within the H&S management system (SMS) are effective.

An audit is an independent, systematic check of risk-control systems and management arrangements to make sure that business objectives are being met. An audit can be an internal audit (first party, conducted by the Organisation) or an external audit (second or third party, conducted on behalf of the Organisation).

Auditing is recognised as a key part of SMS in ISO45001:2018. Audit processes are described in more detail in BS EN ISO19011; 'Guidelines for Auditing Management Systems'.

Auditing relies on a number of principles that are set out in the guidance.

A proportionate, targeted audit programme should be devised and implemented to provide the board with adequate assurance about the 'health' of the SMS and the sustainability of safety performance.

#### Excellence

#### MRA2

- Audit actions identify ways to continuously improve management of risk in the Organisation by referring to examples of excellence in the rail or other sectors.
- Identification of innovative solutions that improve risk management is encouraged in audit reporting and actions.
- Audit and completion of actions arising is understood to be a driver of continuous improvement.
- Auditors are competent to make effective challenge and encouraged to identify and deliver findings which drive continuous improvement.

- Peer-to-peer reviews with other comparable Organisations are routinely included in the audit approach.
- The audit process provides a high level of assurance across the Organisation.

#### OC6 Culture

The Organisation strives to identify best practice in business risk management to inform the audit programme.

#### Predictable

#### MRA2

- Post-change audits are carried out as part of the verification of change process.
- The audit programme includes consideration of new processes and procedures.
- Audit of processes that have been changed is understood to be an important part of the change process.
- Audit is used by all parties in collaborative activities Individually and jointly.

- Audit findings are recognised as important indicators of successful changes.
- Auditors keep their competencies up to date through practice and Continuing Professional Development (CPD) activities.

#### OC6 Culture

Audit is understood to be an essential part of development of processes and procedures contributing to improvement in risk management.

Standardised	MRA2
<ul style="list-style-type: none"> <li>• There is evidence of a coordinated, effective and up to date audit programme.</li> <li>• The Organisation can show that audits are completed by competent auditors.</li> <li>• Audit is understood as an essential part of the risk management process and staff readily engage with the audit programme.</li> <li>• Audit results are accepted, acted upon and tracked through to completion.</li> </ul>	<ul style="list-style-type: none"> <li>• Audit programmes are adequately resourced.</li> <li>• Collaborative activities are included in the audit programme.</li> </ul> <div data-bbox="815 427 1382 674" style="background-color: #4a4a8a; color: white; padding: 10px; border-radius: 15px;"> <p><b>OC6 Culture</b></p> <p>The value of audit is understood at all levels in the Organisation and there is a culture that the challenges and recommendations are positive influences.</p> </div>
Managed	MRA2
<ul style="list-style-type: none"> <li>• There is some auditing, but there is no coordinated audit plan. The audit plan is not proportionate to the risk profile of the Organisation or implemented consistently.</li> <li>• Some departments / processes are audited, but not all.</li> <li>• The role of audit is not understood consistently in the Organisation. Audit is perceived defensively and negatively.</li> </ul>	<ul style="list-style-type: none"> <li>• Some findings are acted upon dependent on the individuals involved. There are some competent auditors, but no system in place to ensure that they carry out the audits.</li> <li>• Some collaborative activities are subject to audit, but there is no consistency.</li> </ul> <div data-bbox="815 994 1382 1218" style="background-color: #4a4a8a; color: white; padding: 10px; border-radius: 15px;"> <p><b>OC6 Culture</b></p> <p>The value of audit is inconsistently understood and challenges are often taken personally, resulting in conflict between auditors and auditees.</p> </div>
Ad hoc	MRA2
<ul style="list-style-type: none"> <li>• There is little, or no evidence of any audits being carried out.</li> <li>• Audits that are carried out are not planned or prioritised and the findings are not acted upon.</li> <li>• The value of audit is not understood, or audits are only completed to satisfy a requirement.</li> </ul>	<ul style="list-style-type: none"> <li>• There is no auditing of collaborative / joint working.</li> <li>• There is no oversight of audit to ensure corrective actions and recommendations are acted on. There is little or no evidence that the Organisation can demonstrate that persons undertaking audits are competent.</li> </ul> <div data-bbox="815 1592 1382 1760" style="background-color: #4a4a8a; color: white; padding: 10px; border-radius: 15px;"> <p><b>OC6 Culture</b></p> <p>There is little or no understanding of the value of auditing, which is seen as a chore.</p> </div>

## MRA3 – INCIDENT INVESTIGATION

### Introductory Notes

Proportionate investigation of accidents, incidents and near misses is essential to learn from adverse events.

Accidents, incidents and near misses provide stark learning opportunities. It is important events from all sources are reported. An open and just culture is necessary to support an effective system.

It is not usually feasible to investigate all events; an appropriate system of selection is often necessary – usually prioritising high hazard events, i.e., those with severe actual injury or those with potential for serious injury.

Investigations need to be proportionate getting to underlying causes and concluding with practical lessons for improvement and learning. Suitable analysis of events and investigation findings assists in identifying common underlying issues and systemic problems.

#### Excellence

- The Organisation actively seeks to implement findings from external investigations to support continuous improvement.
- Managers and board members have objectives to review reports of external investigations from the rail and other sectors to identify opportunities for continuous improvement.
- Relevant investigation outcomes are routinely shared within and outside of the Organisation.
- Board members and managers are active in promoting and supporting the development of techniques and training for investigations.

#### MRA3

- Collaborative working incidents are investigated to learn lessons that aid continuous improvement.

#### OC6 Culture

There is a ‘just’ organisational culture where all employees freely participate in the investigation, openly and honestly. Incident investigation is seen by all employees as an opportunity to deliver continuous improvement and managers respond fairly.

#### Predictable

- The quality of investigation produces recommendations that can be applied both within and outside the Organisation.
- The range of incidents investigated includes, where appropriate, non-compliance, non-conformance, near miss / hit reports and H&S complaints or disruptions to work and where expected outcomes are not achieved.
- Investigations produce recommendations which can be applied across the Organisation and relevance outside the Organisation is routinely considered as the impact of the recommendations on risk management.

#### MRA3

- Employee representatives including, where appropriate, trades union safety representatives are actively involved in investigations.
- The effects of recommendations from investigations on risk control in collaborative working, are themselves reviewed to demonstrate improvements in risk control.

#### OC6 Culture

Investigations and recommendations arising from them, are generally accepted as important ways of improving risk management.

Standardised	MRA3
<ul style="list-style-type: none"> <li>The defined management arrangements for when and how investigations are carried out are followed consistently across the Organisation.</li> <li>The underlying causes of an incident are identified and investigated. Investigations are also carried out after a near miss or near hit and H&amp;S complaints.</li> <li>The investigation team selected is proportionate to the type and severity of the matter under investigation. Employee representatives participate in the investigation.</li> <li>There are systems in place to ensure that the competence of investigators is maintained.</li> </ul>	<ul style="list-style-type: none"> <li>The investigation procedures include collaborative working and the need to investigate reports of non-compliance, non-conformance, near miss / hit reports and H&amp;S complaints.</li> <li>Human factors and human performance are considered as part of the investigation and the training for investigators.</li> </ul> <div data-bbox="815 573 1372 824" style="background-color: #4a4a8a; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>There is a general understanding of the importance of good quality investigations into a range of occurrences generating recommendations that improve systematic control of risks.</p> </div>
Managed	MRA3
<ul style="list-style-type: none"> <li>Incidents are investigated, but only where the Organisation’s guidance directs. The investigation process followed is not proportionate to the risk.</li> <li>Frequently, only immediate causes are identified and investigated.</li> <li>The range of incidents investigated is limited to accidents. Recommendations are limited to preventing the same thing happening again. They do not identify areas for wider improvement.</li> <li>Investigations are carried out only by safety professionals or managers, who are not independent of the incident.</li> </ul>	<ul style="list-style-type: none"> <li>Inconsistent use of investigations during collaborations.</li> <li>Confidential incident reporting is embedded in the investigation process (see Annex 1).</li> </ul> <div data-bbox="815 1037 1372 1288" style="background-color: #4a4a8a; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>The culture is to accept inconsistencies in investigations and superficial recommendations which do not improve risk management.</p> </div>
Ad hoc	MRA3
<ul style="list-style-type: none"> <li>There is no evidence of effective investigations, and the culture of the Organisation is to find someone to blame.</li> <li>Employees do not believe it safe to speak up and therefore tend to cover up genuine errors.</li> <li>The Organisation focuses on the actions of the individuals, rather than looking to challenge the adequacy of systems and risk controls.</li> </ul>	<ul style="list-style-type: none"> <li>No training in investigation techniques, no independent investigators</li> <li>No joint investigations of incidents during collaborative ventures.</li> </ul> <div data-bbox="815 1603 1372 1792" style="background-color: #4a4a8a; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>Evidence of a blame culture when something happens.</p> </div>



## MRA4 – MANAGEMENT REVIEW

### Introductory Notes

Management reviews check to ensure that policies, strategies and plans remain appropriate and effective in the face of feedback from monitoring, investigations and audit findings. Reviewing safety performance takes a ‘big picture’ overview of the patterns of evidence arising from all forms on monitoring, investigation and audit to decide whether the overall approach, policies, resources, priorities, improvement targets and the SMS remain relevant and appropriate in pursuing the safety vision and strategy and cultural development.

#### Excellence

- Board reviews are carried out routinely as planned and result in suggestions for continuous improvement of risk management performance.
- The board and senior management reviews bring about demonstrable continuous improvement and confirm the strategic direction or lead to changes.
- There is clear evidence that the outputs of management reviews are shared to improve processes or shape positive behaviors.
- Reviews are informed by corrective actions, monitoring and measuring results, audit results and consultation and participation of employees and, if appropriate trades unions.

#### MRA4

- Reviews are carried out collaboratively with other Organisations, using shared evidence and strategies, and measures of good and bad performance with the purpose of continuous improvement.

#### OC6 Culture

The Organisational culture encourages suggestions for improvement and these routinely trigger management reviews.

#### Predictable

- Management reviews systematically include learning lessons from events in other Organisations and other industries.
- There is a process to review lessons learnt from other Organisations, including reviewing the output from confidential reporting services (see Annex 1).
- Management reviews include measures of the outcome of changes.

#### MRA4

- Reviews of the outcomes of changes are compliant with the relevant requirements of recognised management system standards and guidance e.g. ISO45001:2018 Clause 9.3.
- Changes resulting from collaborative working are included in board reviews of outcomes.

#### OC6 Culture

Widespread belief that management reviews result in changes which are effective in controlling H&S risks.

Standardised	MRA4
<ul style="list-style-type: none"> <li>• Management automatically uses findings from monitoring and audits to review the Organisation’s performance and make changes where necessary.</li> <li>• Reviews are also triggered following events in addition to planned cyclical reviews.</li> <li>• Recommendations from reviews are clearly allocated, tracked and show that the wider implications are considered to ensure continuing suitability, adequacy and effectiveness.</li> </ul>	<ul style="list-style-type: none"> <li>• Management reviews are compliant with the relevant requirements of recognised management system standards and guidance e.g., BS ISO45001:2018 Clause9.3.</li> <li>• Management reviews for collaborative working are compliant with the relevant requirements of recognised management system standards and guidance e.g., BSISO45001:2018 Clause 9.3.</li> </ul> <div data-bbox="815 584 1382 882" style="background-color: #4a4a8a; color: white; padding: 10px; border-radius: 15px;"> <p><b>OC6 Culture</b></p> <p>Good communications of outcomes from board reviews and actions arising leads to culture where all believe that the Organisation cares about risk management and that individuals can and do contribute to it.</p> </div>
Managed	MRA4
<ul style="list-style-type: none"> <li>• Management reviews are carried out but do not always align with the Organisational risk profile and strategies.</li> <li>• Reviews of the Organisation’s H&amp;S management system (SMS) are only undertaken at planned intervals.</li> <li>• Management reviews are limited to simple data such as outcomes and status of actions from previous management reviews.</li> </ul>	<ul style="list-style-type: none"> <li>• Inconsistent application of standards to some reviews of some areas of the Organisation.</li> </ul> <div data-bbox="815 1095 1382 1301" style="background-color: #4a4a8a; color: white; padding: 10px; border-radius: 15px;"> <p><b>OC6 Culture</b></p> <p>Some understanding and support for the board role in setting and reviewing safety performance, but it is inconsistent.</p> </div>
Ad hoc	MRA4
<ul style="list-style-type: none"> <li>• There is no analysis of the findings of monitoring and audits by senior management.</li> <li>• Achievement of risk management objectives is not reviewed.</li> <li>• Management are not able to demonstrate that the SMS has delivered the intended objectives.</li> <li>• No effective application of management system standards relating to management review, e.g., BSISO45001:2018 Clause A9.3.</li> </ul>	<ul style="list-style-type: none"> <li>• No effective review of objectives relating to collaborative working arrangements.</li> </ul> <div data-bbox="815 1491 1382 1823" style="background-color: #4a4a8a; color: white; padding: 10px; border-radius: 15px;"> <p><b>OC6 Culture</b></p> <p>No or little understanding, at any level, of the importance of senior level review to ensure that risk management objectives are delivered. Culture of believing that the board do not care about safety or safety risk management.</p> </div>

## MRA5 – CORRECTIVE ACTION

### Introductory Notes

Corrective action and change management programmes secure the proportionate, prioritised close out of actions arising from monitoring, investigations, audits and reviews.

#### Excellence

#### MRA5

- The Organisation monitors reports from the rail and other industries to identify and implement corrective actions that improve risk management.
- The board and senior managers can provide evidence on how corrective action has supported continuous improvement.
- Corrective actions are sought and shared from national and international Organisations.
- There is a highly effective systematic approach and demonstrable improvements to risk management.

- Effective collaboration ensures that corrective actions are shared and adopted by organisations with shared or similar risks.

#### OC6 Culture

Individuals can and do identify actions from outside the Organisation which improve risk management within the Organisation.

#### Predictable

#### MRA5

- Corrective actions are linked to objectives set out in the H&S management
- System to deliver the greatest benefit possible.
- The board and senior managers actively support and resource the delivery of corrective actions.
- Corrective actions are considered as part of the change management process.

- Corrective actions are verified and validated proportionately to ensure effective risk control.

#### OC6 Culture

Reviews following change are recognised as opportunities to implement improvements to risk management in the Organisation.

#### Standardised

#### MRA5

- Underlying causes are routinely identified, and corrective actions are appropriate to the potential risk.
- The right people are tasked with owning actions to ensure effective implementation.
- Corrective action will be at any level of the SMS and all actions are tracked to closure.

- Corrective actions are actioned in a timely fashion that is proportionate to the risk addressed by the action.
- System for addressing corrective actions includes those affecting or arising from collaborative ventures.

#### OC6 Culture

Individuals understand the importance of completing corrective actions and the Organisation can demonstrate a learning culture.

Managed	MRA5
<ul style="list-style-type: none"> <li>• Corrective actions address only the immediate causes or those which are quick and simple to implement and rarely address underlying causes.</li> <li>• Actions are owned, but not always by the individual best placed to implement them effectively.</li> <li>• There is some tracking of corrective action to completion by senior managers, but not consistently.</li> </ul>	<ul style="list-style-type: none"> <li>• Corrective actions are not prioritised consistently on the basis of risk.</li> <li>• Inconsistent sharing of lessons learned during collaborative ventures.</li> </ul> <div data-bbox="815 427 1382 629" style="background-color: #4a4a8a; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>Inconsistent completion of corrective actions. Completion depends on individuals involved and not system driven.</p> </div>
Ad hoc	MRA5
<ul style="list-style-type: none"> <li>• Monitoring, audits and reviews result in little or no change, either because none are carried out or they are not followed up.</li> <li>• No systematic process for ensuring corrective actions are completed.</li> <li>• The Organisation does not know if lessons are being learned from incidents and cannot demonstrate continuous improvement or a learning culture.</li> </ul>	<ul style="list-style-type: none"> <li>• No application of legal or other standards.</li> <li>• No sharing of lessons learned with collaborators.</li> </ul> <div data-bbox="815 824 1382 1003" style="background-color: #4a4a8a; color: white; padding: 10px; border-radius: 10px;"> <p><b>OC6 Culture</b></p> <p>Culture of acceptance of non-completion of corrective actions.</p> </div>

## 5. References

- 1) European Foundation for Quality Management (EFQM)
  - <https://www.efqm.org>
- 2) UK Health & Safety Guidance – Managing for Health and Safety HS(G) 65.
- 3) Health and Safety Management ISO 45001.
- 4) ORR’s RM3 2019 The Risks Management Maturity Model – ORR web publication
  - <https://www.orr.gov.uk/guidance-compliance/rail/health-safety/strategy/rm3>
- 5) UK RSSB Safety Culture Toolkit
  - <https://safetyculturetoolkit.rssb.co.uk/home.asp>
- 6) UAE Occupational Health and Safety Management System (OHSMS) National
  - AE/SCNS/NCEMA 6000:2016