A brief note for safety and assurance managers

Understanding the new Regulation on the Common Safety Method for monitoring

Implementation of a new Regulation

The new Regulation CSM for Monitoring will bring new requirements to Railway Undertakings (RUs), Infrastructure Managers (IMs) and Entities in Charge of Maintenance (ECMs). It will be applicable from 7 June 2013 and is very likely to require changes to Safety Management Systems (SMSs).

The Regulation states that it: ‘establishes a common safety method (CSM) for monitoring enabling effective management of safety in the railway system during its operation and maintenance activities and, where appropriate, improving the management system.’ [Article 1 (1)]

Running in conjunction with the CSM for Monitoring is the CSM for Supervision which places requirements on the ORR to ‘supervise’, ie to check on the effectiveness of the Safety Management Systems of RUs and IMs, and for ECMs, their Systems of Maintenance. For the purposes of this document ‘SMS’ can be taken to include these Systems of Maintenance, however the requirements on ECMs are slightly different and ECMs are advised to check the Regulation.

Structure of the Regulation

This short leaflet aims to explain the Regulation so that it is not necessary to read it in full. However, should readers wish to study the Regulation it is useful to note its structure. After the introductory comments it contains 6 short Articles, followed by 7 Annexes which add important details, mainly to the Monitoring process in Article 3. In the centre of this leaflet is a flow chart framework for the Monitoring process, extracted from the Regulation.

Introduction

The Regulation requires the self-checking of the application and effectiveness of the SMS, including the SMS processes and procedures, plus the checking that it achieves the expected outcomes. It then requires preventative and/or corrective measures to address weaknesses.
Monitoring process

General

RUs, IMs and ECMs must apply a monitoring process that meets the requirements of the Regulation, including either direct monitoring of contractors or requiring them to apply such a process via contract. This monitoring process will be iterative, leading to improvements in the SMS where appropriate.

The Monitoring process must contain the following which are expanded on below:

- A documented strategy, which is prioritised based on risk, and a plan(s) for monitoring
- Analysis of information collected
- Implementing an action plan to address unacceptable non-compliances
- Evaluation of the effectiveness of the action plan implementation

The Regulation does not specify that the monitoring process should be within the SMS but it would be sensible to either include it or have the SMS refer to it being within separate document(s).

Domain

MONITORING PROCESS

DEFINITION OF A STRATEGY, PRIORITIES AND PLAN(S) FOR MONITORING

- Define (or review) a strategy, priorities and plan(s) for monitoring all (the concerned) processes, procedures and technical, operational, organisational risk control measures

ANALYSIS AND EVALUATION OF INFORMATION

- Collection of necessary information
- Analysis and evaluation of non-compliances
- Are non-compliances acceptable?
- Are non-compliances identified?

IMPROVEMENT OF PROCESSES, PROCEDURES, AND TECHNICAL, OPERATIONAL, ORGANISATIONAL RISK CONTROL MEASURES AND OF MANAGEMENT SYSTEM AS A WHOLE

- Definition of an action plan
- Implementation of the action plan
- Evaluation of the effectiveness of the action plan measures

MONITORING STRATEGY

The monitoring strategy should include the selection of quantitative or qualitative indicators and the collection and analysis of information on these indicators to give early assurance or warning of deviation from expected outcomes, with details that will support decision making.

Information on indicators may be gained through a variety of methods and tools, eg: predetermined performance indicators, inspections, audits, accident investigation reports, fault reporting and informal channels such as staff feedback. (see ERA Guide to be issued in early 2013)

Prioritising based on risk

The prioritising should take into account the areas of greatest risk and those that, if not monitored effectively, could lead to adverse safety consequences. Account of previous monitoring should also be taken. The prioritising should be indicated by the setting of timescales and resources.

Monitoring plan

The plan is the written details of the coordinated application of the strategy and it should focus on early identification of non-compliances that are likely to result in undesired events.

Collection of information

Information should be collected as determined in the strategy and plan to facilitate analysis.

Action plan and its implementation

After the evaluation of the information any unacceptable non-compliances shall be addressed via an action plan which will:

- Lead to correct implementation of risk controls or
- Improve existing risk controls or
- Implement additional risk controls

The action plan must include the following information:

(a) Objectives and results expected
(b) Corrective, preventive or both type of measures required
(c) Person responsible for implementing actions
(d) Dates by which actions are to be implemented
(e) Person responsible for evaluating the effectiveness of the action plan measures (see 6 and 7 below)
(f) A review of the impact of the action plan on the monitoring strategy, priorities and plan(s)

Where the action plan, or parts of it, relate to managing safety at interfaces then the implementation of actions must be agreed with the others involved.
Exchange of information

RU s, IM s and ECM s and their contractors shall ensure that any relevant safety-related information resulting from applying the monitoring process (including defects and construction non-conformities or malfunctions of technical equipment, including those of structural sub-system) is exchanged between them, to enable the other party to take any necessary actions relating to railway (system safety) performance.

Reporting to the ORR

RU s and IM s shall include in their Annual Safety Reports to the ORR a report on the application of the CSM for Monitoring. ECM s shall make the information available to the certification body (initially the ORR) and where contracts specify, to IM s and RU s.

The information in the report shall include:

a) A description of the organisation and the staff who carry out the monitoring process
b) The results of the monitoring process and the decisions they led to
c) A list of measures to address unacceptable non-compliances

Beyond the above, the ORR has not yet specified the content or level of detail required in these reports.

Other guidance

Early in 2013 the ERA is due to publish a CSM for Monitoring Guide and RSSB will publish a wider ranging, but compatible, Safety Assurance Guidance document. In addition, RSSB published Measuring Safety Performance - How to develop and manage safety performance indicators for Britain’s railways in September 2011.