



## Principles for identifying Railway Group Standards as national safety rules

### 1 Purpose of the paper

- 1.1 This paper sets out the principles for the identification of Railway Group Standards (RGSs) as national safety rules (NSRs) against the Railway Safety Directive (RSD), as approved by the Industry Standards Coordination Committee (ISCC) on 19 October 2007 and by the Safety Policy Group (SPG) on 20 November 2007.

### 2 Background

- 2.1 The UK's NSR notification needs to accord with the definition of NSRs specified in the RSD, in particular, the seven 'types' of NSR listed in Annex II of the RSD. A set of principles have been developed for what sorts of RGSs (or clauses within RGSs) should be included in response to each of the seven 'rule types'. These principles have been developed and subsequently approved by ISCC on 19 October and SPG on 20 November and are defined in the following section.
- 2.2 The principles for identifying RGSs as NSRs fall into two categories: general principles applicable to all of the rule types, and additional principles which are intended to assist with the identification of RGSs within each rule type.

### 3 General principles for identifying RGSs as NSRs

- 3.1 National rules, including RGSs, may need to be notified as National Technical Rules (NTRs) in response to the Interoperability Directives or as NSRs in response to the RSD. Where a RGS meets the requirements for notification as both a NTR and a NSR, then it will need to be notified twice. This is unlikely to affect very many RGSs.
- 3.2 It is unclear what European process will need to be followed in order to make any amendments to the RGSs which have been notified as NSRs, once the common safety targets are implemented in 2009. For this reason, the list of RGSs should be kept as short as possible while still delivering the intent of the RSD, which is for NSRs to provide visibility to Railway Undertakings of the rules that are in use and will apply to them if they want to operate in another country.

- 3.3 RSSB is currently in the process of reviewing all of the RGSs under the Strategy for Standards Management (SSM), which is resulting in the withdrawal of a significant proportion of the content of RGSs, as it reflects issues which are the responsibility of individual duty holders and are out of scope for mandating in cross industry standards concerned with cooperation between duty holders. Regardless of whether they are proposed for withdrawal under the SSM, any RGSs which fall within a NSR type and which will still be in force in the February 2008 catalogue will need to be notified.
- 3.4 The extent of the work that RSSB needs to do is limited to identifying any necessary RGSs which need to be notified as NSRs. The DfT will review necessary legislation to determine what will need to be notified as NSRs. This notification will include the Health and Safety at Work etc Act 1974 (HASAWA), the Railways (Interoperability) Regulations 2006 and the Railways and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS).

#### **4 Type 1 NSRs: rules concerning existing national safety targets and safety methods**

- 4.1 There are no national safety targets contained within RGSs.
- 4.2 RGSs do not contain safety methods; they may require a risk assessment to be undertaken and specify a number of issues to be taken into account, but they do not specify the risk assessment methodology to be applied. A number of risk assessment methodologies are contained in either rail industry approved codes of practice (RACOPs) or guidance notes (GNs) but these are not mandatory.
- 4.3 There are no existing RGSs that should be notified as Type 1 NSRs.

#### **5 Type 2 NSRs: rules concerning requirements on safety management systems and safety certification of railway undertakings**

- 5.1 There is nothing on this subject contained within RGSs, hence there are no existing RGSs that should be notified as Type 2 NSRs.

**6 Type 3 NSRs: rules concerning requirements for the authorisation of placing in service and maintenance of new and substantially altered rolling stock that is not yet covered by a TSI. The notification shall include rules for exchange of rolling stock between railway undertakings, registration systems and requirements on testing procedures**

- 6.1 GE/RT8270 *Assessment of Compatibility of Rolling Stock and Infrastructure* supports the process of placing rolling stock in service and will need to be notified as a Type 3 NSR.
- 6.2 Any RGSs referred to in GE/RT8270 as supporting documents should not be included on the list of NSRs on the basis that the references in GE/RT8270 are sufficient for other railway undertakings to know about these RGSs.
- 6.3 GM/RT2453 *Registration of Rail Vehicles and Mandatory Data Requirements* is the only RGS relating to registration systems and will need to be notified.
- 6.4 No RGSs are required to be notified for testing procedures. because the testing procedures referred to in the Safety Directive are those related to novel equipment, not the testing procedures for detailed technical equipment which tend to be contained in RGS.
- 6.5 GM/RT2004 *Requirements for Rail Vehicle Maintenance* is likely to be relevant to this category of NSR and further work is needed to determine whether there are any other RGSs addressing rolling stock maintenance which also need to be notified.

**7 Type 4 NSRs: common operating rules of the railway network that are not yet covered by TSIs, including rules relating to the signalling and traffic management system**

- 7.1 All RGSs describing operating rules which are not already notified as national technical rules *and which apply to railway undertakings* should be notified as NSRs so that any open access operator coming onto the mainline railway has visibility of all of the operating rules they will have to comply with. Any RGSs which only describe rules for the infrastructure manager should not be notified.

- 8 Type 5 NSRs: rules laying down requirements on additional internal operating rules (company rules) that must be established by infrastructure managers and railway undertakings**
- 8.1 There will be some operations RGSs which require operating rules to be established by individual companies and which will need to be notified as Type 5 NSRs.
- 9 Type 6 NSRs: rules concerning requirements on staff executing safety critical tasks, including selection criteria, medical fitness and vocational training and certification as far as they are not yet covered by a TSI**
- 9.1 This issue is covered by part four of the ROGS Regulations and the management of it is the responsibility of individual duty holders. Everything which remains within a RGS relating to this issue has been or is scheduled to be withdrawn under the SSM. However, any RGSs which require such rules and which will still be in force in the February 2008 catalogue will need to be notified.
- 10 Type 7 NSRs: rules concerning the investigation of accidents and incidents**
- 10.1 GO/RT3473 *Accident and Incident Investigation* will need to be notified as a Type 7 NSR.
- 10.2 GO/RT3471 *Accident and Incident Response Planning* and GO/RT3472 *Accident and Incident Management* are currently under review with the intention of combining into a single document. However, these documents will also need to be notified, unless the successor document will be published and included in the February 2008 catalogue.