



## Briefing note for changes to the Railway Group Standards Code (from Issue Two to Issue Three)

**Version:** Final

**Date:** 04 April 2008

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### 1 Relevant documents

**Title:** Railway Group Standards Code

**Number:** RGSC 01 **Issue:** Three

**Synopsis:** The Railway Group Standards Code fulfils the requirements of the RSSB Constitution Agreement for a Code governing activities by RSSB and the members of RSSB in relation to Railway Group Standards (RGSs).

The Code defines the mechanisms by which the members of RSSB co-operate to produce and maintain RGSs and deviations from them, and RSSB's role in supporting this co-operation.

**Title:** Standards Manual

**Number:** RGSC 02 **Issue:** One

**Synopsis:** The Standards Manual supplements the Code by defining those elements of the cross industry management of RGSs and associated documents which are not subject to formal ORR approval.

**Publication date:** 27 March 2008

**In force date:** 07 June 2008

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### 2 Introduction

2.1 The intent of Issue Three of the Railway Group Standards (RGSs) Code (the Code) is to make the standards process simpler and easier to understand for all parties involved, while aligning the governance of RGSs with the regulatory environment within which the GB railway has to operate, as defined within the Railways (Interoperability) Regulations 2006 (RIR) and the Railways and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS).

2.2 Both Issue Three of the Code and Issue One of the Standards Manual are required to replace the existing Issue Two of the Code. In future, it will be possible to amend the Standards Manual without changing the Code.

2.3 Both the RGS Code and the Standards Manual are required to be complied with by RSSB and the duty holders who are members of RSSB.

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### **3 Summary of changed controls and implications for industry**

- 3.1 Issue Three of the Code contains only that which is directly required by the RSSB Constitution Agreement, or which the Industry Standards Co-ordination Committee (ISCC) drafting group felt should be subject to Office of Rail Regulation (ORR) approval. Wherever possible, this has been implemented by defining the principles of the RGS change process in the Code while leaving much of the detail in the Standards Manual.
- 3.2 The overall process for the management of RGSs is essentially unchanged in Issue Three of the Code and retains the following key elements of Issue Two:
- a) The composition of ISCC and Standards Committees is required to be representative of the members of RSSB
  - b) Standards Committees have the responsibility for taking decisions on RGSs and monitoring the European standards which may affect the GB mainline railway
  - c) All decisions in relation to RGSs shall be made by consensus
  - d) The geographic scope to which RGSs apply remains the mainline railway (as defined in ROGS)
  - e) The RSSB Board, operating by consensus, may review the composition of a Standards Committee if it is not following the requirements of the Code.
- 3.3 Wherever possible, the definitions used within the Code and the Standards Manual have been aligned with those already in use in existing legislation, either in European Directives or GB Regulations.
- 3.4 Issue Three of the Code strengthens the role of the ISCC in overseeing the RGS change process, including being the decision taking body for changes to the Standards Manual. The Standards Manual does not require direct approval by the ORR, thus enabling the industry to have more direct control over the detail of the RGS change process and to more quickly and easily make changes to this process than under the current arrangements for the Code.
- 3.5 With Issue Three, the authoritative version of a RGS will be that which is available from the RSSB website (currently the [www.rgsonline.co.uk](http://www.rgsonline.co.uk) website). RSSB will no longer distribute controlled copies of standards to all industry members, although 'hard' copies of RGSs will still be available on request. This will reduce the RSSB publication cost associated with changing a RGS and provides the opportunity for further increases in efficiency in future. It is not anticipated that this change will result in significant cost savings for infrastructure managers or railway undertakings; in response to each change to a RGS, companies will still need to review their processes, procedures and standards and brief their staff on the changes.
- 3.6 The scope of RGSs under Issue Three of the Code is broader than that defined in Issue Two. A central idea of the Strategy for Standards Management (SSM) is that mandatory industry standards should only include measures that relate to areas of co-operation between duty holders. Issue Three makes it clear that any area of co-operation between any two or more duty holders is in scope of a RGS, although it is only measures relating to co-operation to manage safety which *must* be included in a RGS. Issues which are the responsibility of an individual duty holder and where co-operation with another party is not required may not be defined within

a RGS, unless a measure addressing that issue is specifically needed to fill an 'open point' in a Technical Specification for Interoperability (TSI). In practice, the effect of this change in scope is expected to be limited.

- 3.7 The widening of the scope of measures which may be included in a RGS to issues other than safety means it is now possible for a RGS to address any of the essential requirements (as defined in the Interoperability Directives) if there is cross-industry consensus that this is appropriate and needed to facilitate the effective operation of the railway.
- 3.8 The decision criteria included in Issue Two of the Code have been replaced by a decision framework which aligns with the industry's agreed approach to decision taking, as described in the *Taking Safety Decisions* document, which is available from the RSSB website<sup>1</sup>. The Code decision framework requires Standards Committees to take an holistic view of a series of factors when taking a decision. These factors include, among other things, whether a measure delivers its intention (including the impact on the safety of the railway system as a whole), the costs and benefits associated with the measure(s) and the ability of the railway system and its subsystems to meet the essential requirements.
- 3.9 The framework makes it clear that one has to consider all parts of the system, and the effects of what is proposed on the other parts as well as that directly affected in order that the measures included in RGSs are in the 'long-term best interests of the mainline railway as a whole'. The framework also gives flexibility when taking decisions, thus allowing common sense to be applied and trade-offs to be made (for example, the removal of an existing measure when a better one is identified).
- 3.10 A key difference from Issue Two is that the decision framework in Issue Three no longer includes the concept of reasonable practicability as this is an overarching legislative requirement and there is no need to duplicate it within the RGSs governance arrangements.
- 3.11 Both the 'Rapid Response' and the 'Minor Change' procedures have been removed as completely separate procedures from Issue Three of the Code. The 'Rapid Response' procedure, in particular, was at odds with the industry-owned and consensus-driven method by which RGSs are now governed; a RGS may be changed very quickly where there is existing industry consensus, but it will always take longer where the issues are complex and/or extensive discussions are required in order to achieve this consensus. Issue Three of the Code reinforces the role of Standards Committees in terms of approving the programme for each RGS change, and allows significant flexibility for the procedures to be shortened to deliver change quickly where this is required and consensus exists. This change will have no impact on the way in which RGSs change is managed in future.
- 3.12 The facility to deviate from RGSs still exists under Issue Three of the Code, but only as a temporary non-compliance for a defined period of time, or as a permanent derogation. The option for a 'non-compliance (pending standards change)' has been removed from Issue Three of the Code. This form of deviation is, in fact, a change to a RGS that takes effect from the time the non-compliance is approved. However, there were a number of concerns that the arrangements for managing this form of deviation were not as robust as those for changing a RGS, and that where a non-compliance had been issued duty holders needed to read multiple

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<sup>1</sup> Refer to [http://www.rssb.co.uk/safety/safety\\_strategies/sdmoukr.asp](http://www.rssb.co.uk/safety/safety_strategies/sdmoukr.asp) for information on the *Taking Safe Decisions* document and supporting material.

documents

in order to be clear about all of the current requirements that in force within the RGS.

- 3.13 The removal of the non-compliance (pending standards change) option should have little impact on projects, which will still be able to obtain deviations (in the form of a temporary non-compliance or a derogation) which indicate that they had permission to comply with a defined alternative to the RGS which was in force at the time the project was commissioned. However, it is recognised that there is sometimes a need to amend a small part of a RGS more quickly than the normal process will allow. Issue Three of the Code therefore allows for a 'small scale change to a RGS' which, if agreed by the relevant Standards Committee, can be progressed in a shorter timescale. This change is aimed at issues which affect a limited number of clauses in a RGS, where the change to the RGS is readily apparent and the impact of the change is small. The end result will be that the published RGSs will always reflect all of the RGS measures currently in force, without a need to refer to associated documents.
- 3.14 The Code has been amended to clarify that it is up to the Standards Committees to agree with RSSB the timescales that will apply to each RGS change. Where there is industry consensus about the nature of a change there is no reason this should not be progressed quickly.
- 3.15 The other area of change affecting deviations is that applicants are now expected to undertake all necessary consultation with affected parties prior to the application being considered by Standards Committee, and that the applicant should expect to attend the committee meeting to present their case for approval of the deviation. The need for the applicant to consult affected parties directly reflects the requirements of ROGS which place duties on the party initiating change on the railway.
- 3.16 The Standards Manual explicitly defines the status of, and how the change process applies to, Rail Industry Standards (RIS), Codes of Practice and Guidance Notes. The definition of a RIS allows for a group of members of RSSB supported by one infrastructure manager or railway undertaking to request a RIS to recognise the fact that there is only one infrastructure manager on the mainline railway (excluding those responsible only for stations) but a large supply and contractor community working for this infrastructure manager and that RIS documents may provide benefits in this area (for example, for in-possession plant).

Questions or queries regarding the Code or the Standards Manual should be addressed to:

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