

## Heritage Trams Conference

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- History of the education program since 2016. Most T & H operators wish to comply but don't know how. Guidance material assisted by face to face "laymans" explanations. Better to educate voluntarily than compel through traditional regulatory methods
- Format has been SMS Healthcheck followed by specific guidance / discussion based on key themes linked to conclusions from initial discussions.
- Program is voluntary and its effectiveness linked to operator willingness. Those that choose not to participate in education should expect a more traditional approach

# WA Education Program

- > Why Education?
  - Voluntary engagement
  - Vs
  - Traditional regulatory methods
- > ONRSR approach
  - SMS Healthcheck
  - Identify key themes
  - Guidance & discussion
- > What options do operators have?



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## How are we doing?

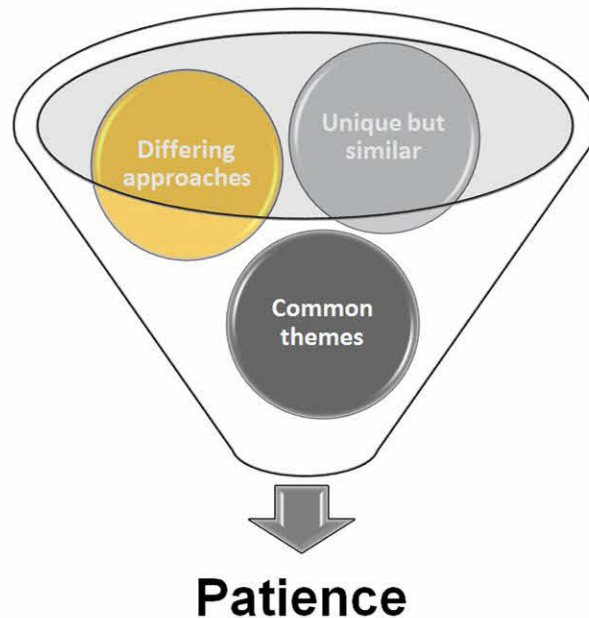
- > Most active operators have received:
  - SMS Healthcheck
  - Further guidance
- > Outcomes:
  - Significant improvements; or
  - Reviews of organisational set-ups
- > Actions taken:
  - Verification through audit/inspection
  - NCRs addressed



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- Almost all operators that are active have received a “Healthcheck” and further guidance
- In many cases we have seen significant improvements or fundamental review of organisational set up. A work in progress
- Where actions have been taken we have verified changes through traditional methods such as audit and inspection but have addressed non conformances as an opportunity for further education and guidance

## What have we learned?



- There are some common themes that have emerged
- Although you are all unique operations, you are similar in your challenges in complying with the RSNL
- Your approach to guidance has differed greatly. Some have acted immediately on advice, some have struggled with the enormity of it, and some have decided to make few changes
- We have learned patience. Volunteer organisations inevitably move at a slower pace than commercial ones. We are looking for evidence of forward progress but not expecting radical changes overnight

## Themes



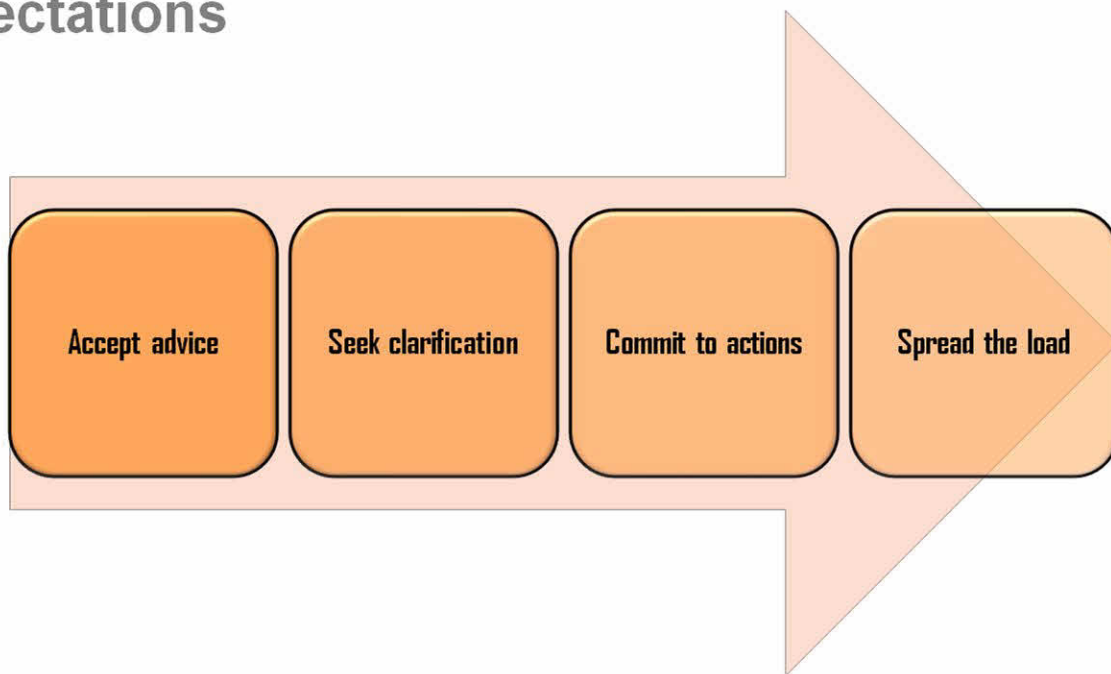
- Governance is an issue in many operators. How does the governing body or person make decisions regarding the risk profile of the organisation without systems and processes to be informed about it ? How do we maintain independence for the decision makers from the “doers” ?
- Risk is at the core of the RSNL. We have seen risk registers that have not been reviewed in some time, risk assessments carried out without involvement of those at risk, risk controls that cannot be practically demonstrated. The risk management of an organisation is a LIVE process and should be continual and ongoing
- Explain issue in terms of regulatory compliance – was a review carried out on passing of the Act ? Does the RSMP reflect the requirements of Schedule 1 of Regs ? How can effective review and SPR be submitted if

system does not conform ? A system needs to be demonstrable to the regulator

- Many operators have “ways” of carrying out tasks. Most operators have a wealth of experience. What is missing are written documents and records that can demonstrate “how we do things around here” They need not be onerous or complex, but they are needed



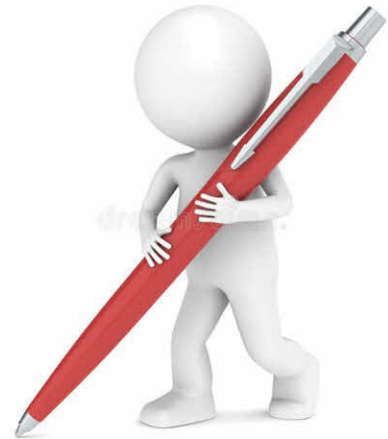
# Expectations



- Its not consultancy, but it's the next best thing ! We are responsible for ensuring compliance with the law, so we know what we want to see – take our advice
- If what we are saying doesn't make sense – ask us to explain it in a different way- ask for practical advice and examples – its our job to work this out
- If you commit to action, make sure its achievable. Be realistic in what can be achieved and by whom
- Ensuring conformance with legislation is not a one person job. Reviewing existing systems and making changes is a big task and should involve the whole organisation – relying on 1 or 2 individuals is a risk to compliance in itself

**And lastly, please .....**

**Document your processes.....**



- If you cannot show us evidence, for the purposes of legislation, it doesn't exist
- Processes that are “in my head” must be written down – they don't need to be complex or wordy, but they do need to be there !





**Thank You – Any Questions ?**

