Part 2

Organisational Fundamentals

Chapter 2

Safety Responsibilities

Your organisation must identify safety responsibilities and put them in writing. It must keep records of the transfer of safety responsibilities and must make sure that anyone taking on safety responsibilities understands and accepts these responsibilities. It must make sure that anyone who is transferring responsibility for safety passes on any known assumptions and conditions that safety depends on.

2.1 Guidance from volume 1

You need a structured organisation with good communications to carry out successful ESM. Everyone should have clear responsibilities and understand them.

In particular, anyone whose work creates a risk should be responsible for managing it. They should have the knowledge they need to understand the implications of that risk and to put controls in place.

Your organisation should identify who is accountable for the safety of work. They will stay accountable even if they pass on responsibility, for parts of the work, to others.

The organisation that takes the lead in introducing a change should make sure that the other organisations are clear on their safety responsibilities. If you hand over infrastructure changes to an infrastructure controller or hand over rolling stock to a train operator, you may also transfer some safety responsibility.

2.2 Introduction

ESM is a team activity, involving people with different backgrounds from across the organisation and outside it. Therefore, an important part of ESM is the allocation of safety roles with clearly defined safety responsibilities.

These safety roles may be separated into fixed, organisation-related roles and those that are specific to a particular project.

This chapter describes some common safety roles and the related responsibilities, and explains how they can be allocated and transferred, both within an organisation and between organisations.

Responsibility is not necessarily the same as accountability. You are responsible for something if you are entrusted with making sure that it happens. To be accountable for something means that you can be called to account if it does not happen. Generally, managers remain accountable for ESM performance even though they delegate responsibility for ESM activities.

There are certain legal obligations placed on employers and employees with regard to defining responsibilities. See volume 1 for further details.

This chapter is written for:

- managers responsible for the appointment of staff to safety-related tasks or for determining organisational structure, and
- anyone performing an assessment of personnel competence.

2.3 Different types of safety responsibility

A basic principle of ESM is that those whose activities create a risk should be responsible for managing and reducing that risk.

These activities may be related to a particular system or piece of equipment (such as development, operation, maintenance, or modification), or to the provision of resources or information. The safety responsibilities related to these activities may include reducing the risk of component failure, providing accurate technical manuals, ensuring that maintenance is performed in a timely and efficient manner, and so on.

Whatever the activity may be, it is important to:

- clearly define the safety roles and responsibilities;
- gain agreement from all parties on their allocation; and
- pass on any relevant safety-related information.

When responsibility for the system's operation is handed over to another party, risk may then be created by the organisation accepting the system, and therefore some safety responsibilities are also transferred. However, the Project Manager will retain accountability for the development work.

An organisation also needs certain ESM roles that are independent of any particular project. Their responsibilities will include setting safety policy and safety goals, defining other safety responsibilities, granting authority and approval, providing resources, and establishing communication channels.

The following sections therefore suggest two types of safety role: organisation-related roles (Safety Authority, Line Manager); and project-related roles (Project Manager, Project Safety Manager).

Safety roles and their responsibilities should be regularly reviewed to ensure that they are still relevant.

2.3.1 Safety Authority

An organisation performing safety-related work will commonly appoint a senior person as a Safety Authority, responsible for dealing with general safety issues throughout the organisation. They will typically have a high level of authority within the organisation and considerable operational experience and technical knowledge. Train Operating Companies, in particular, will usually appoint an officer with such responsibilities in order to meet railway safety case requirements.

Their role is to promote ESM within the organisation, and to ensure that the work produced by the organisation meets the required safety standards. They will also report on any shortcomings in safety, and provide independent advice on safety issues.

The Safety Authority's responsibilities may include:

- setting, maintaining and monitoring safety policy;
- ensuring that an Engineering Safety Management System is effectively implemented and maintained;
- agreeing the safety classification of projects;
- endorsing key safety documentation for a project;
- monitoring the ESM performed on a project; and
- appointing Independent Safety Auditors and Assessors for projects.

For larger organisations, there may need to be multiple Safety Authorities, with knowledge and experience in different areas.

2.3.2 Line Manager

An organisation may assign a Line Manager to a group of staff and/or a group of projects, to ensure that their activities are run effectively and safely. The Line Manager should assure himself or herself that ESM is performed correctly by the staff and on the projects that they manage. The Line Manager should be familiar with the safety issues relating to these projects.

The Line Manager's safety responsibilities may include:

- assigning sufficient ESM resources (both personnel and other) to the project manager, according to the intended integrity of the project;
- ensuring that the staff allocated to the project have the skills necessary for the tasks to which they are assigned (providing training if needed); and
- ensuring that the ESM performed on a project is monitored.

2.3.3 Project Manager

Some of an organisation's work may be grouped into projects, with Project Managers taking overall responsibility for the work. The Project Manager's safety role is to ensure the safety of the work done under their direction.

The Project Manager's safety responsibilities may include:

- ensuring that the project conforms to all relevant ESM standards and procedures;
- ensuring that all safety activities are carried out and documented in accordance with good engineering practice; and
- ensuring that the risk associated with all project deliverables is reduced 'As Low As Reasonably Practicable'.

The Project Manager will generally report to the Safety Authority on all safety issues and to the Line Manager on all management issues.

2.3.4 Project Safety Manager

For larger projects, there may be a need for a Project Safety Manager, who will take the safety responsibilities from the Project Manager. However, the Project Manager will typically retain overall accountability for the safety of the project.

2.3.5 Other roles

There may also be a requirement for Independent Safety Auditors and Assessors. These roles and their responsibilities are described fully in chapter 14.

2.4 Allocating safety responsibilities

Responsibilities for ESM should be allocated from the top of the organisation downwards. The senior manager in an organisation or department appoints the Safety Authority and assigns responsibilities to them. The senior manager should also assign safety responsibilities to the Line Managers. In turn, the Line Managers should assign a Project Manager to a particular project. The Project Manager may then delegate safety responsibilities to a Project Safety Manager (if one is to be appointed).

It is essential that safety roles and responsibilities are clearly defined and documented. The responsibilities assigned to individuals should be explicit and understood by everyone in the organisation. In this respect, they should be documented and made freely available within the organisation.

The documentation should identify:

- the various organisational positions;
- the associated responsibilities and authorities for ESM; and
- the communication and reporting channels.

Safety roles and responsibilities should be put in writing.

When someone is proposed for safety-related work, they should be given a task description, detailing their specific responsibilities, the authority that they will carry, and their lines of reporting. They should confirm that they understand and accept the task description before their assignment is confirmed.

There should be some form of organisational structure chart available to all employees, containing details of the organisation's safety roles.

The definition of safety responsibilities should be periodically reviewed.

2.5 Transferring safety responsibilities within an organisation

Transfer of safety responsibilities may occur within an organisation in a number of circumstances including, the following:

- one Project Manager replaces another;
- (within a product organisation) a Project Manager hands over a completed development to a manager with a product support role; and
- (within a railway operator) a Project Manager hands over a completed project to the operating function.

Typically the manager accepting responsibility will take on all the safety responsibilities that the relinquishing manager had, although the relinquishing manager will remain accountable for his or her past actions.

Many different situations may occur but two fundamental points should be observed:

- No responsibility should be transferred until the accepting manager confirms in writing that he or she is prepared to accept it.
- The relinquishing manager should make sure that all relevant safety information is recorded and that the records are up-to-date (see 2.7 below).

  Typically, the relinquishing manager will do this by assuring himself or herself that the Hazard Log for the project is up-to-date and comprehensive, and, in particular, that it records all assumptions and unresolved issues and then by endorsing the Hazard Log (see chapter 13 for more details on the Hazard Log).

2.6 Transferring safety responsibilities between organisations

Typically this occurs when a supplier completes a contract for the supply of a safety-related system. Exactly which areas of safety responsibility are transferred to the customer and which remain with the supplier will be determined by the law and the contract. The contract may leave the supplier with responsibility for maintenance, for instance, in which case associated safety responsibilities will also remain with the supplier.

In any case, the supplier will remain accountable for their past actions.

Many different situations may occur but two fundamental points should be observed:

- No responsibility should be transferred until the accepting organisation confirms in writing that it accepts the responsibility.
- The supplier should make sure that all relevant safety information is recorded and that the records are up-to-date (see 2.7 below).

  Typically, the supplier will do this by delivering a Safety Case. The Safety Case should include a comprehensive list of assumptions, limitations on use and any other caveats on which the conclusions of the Safety Case are based (see chapter 10).

ESM is concerned with controlling the risk associated with *changes* to the railway. Once the change has been made, there is still a need to control risk but this falls outside the scope of this book.

2.7 Passing on information

When a system is handed over, all information relevant to the safe operation of the system should be passed on to the organisation accepting the system. This is the responsibility of the Project Manager. There is a legal obligation in the '*Health and Safety at Work etc Act 1974'* for suppliers of safety-related articles to ensure that there is adequate information for the articles to be put into safe use.

The information handed over will typically include the following:

- system description, including details of interfaces and environmental requirements;
- hazards, precautions and safety features of the system;
- safety information for operators of the equipment or system;
- detailed instructions for the operation, servicing and maintenance of the equipment, including operating and technical handbooks, parts and spares identification lists, drawings, and so on;

- installation details, including calibration, verification testing, training requirements, inspection schedule, and decommissioning requirements;
- details of responsibilities to be transferred, including hazard log maintenance, training, system maintenance, and so on;
- details of items to be transferred, including hardware, software, and documentation;
- procedures for fault reporting and change control, including approval;
- details of training requirements, including routine operation, emergency procedures, maintenance, and so on.

The Hazard Log and the Safety Case are often the most important documents. They describe the risks and how they are controlled. The system suppliers usually retain a copy and some agreement may be needed on who will hold the master document.

2.8 Related guidance

Competency and training requirements for the roles outlined in this chapter are dealt with in chapter 4.

Safety Cases and Safety Approval are discussed in chapter 10.

Hazard Logs are discussed in chapter 13.

The roles of the Independent Safety Auditors and Assessors and their responsibilities are described fully in chapter 14.

Chapter 3

Safety Culture

Your organisation must have safety as a primary goal.

3.1 Guidance from volume 1

The most important factor in achieving safety is creating a safety culture. This means running an organisation so that safety is seen as a primary goal and considered appropriately in every activity. Everyone should understand that achieving safety will help to meet business goals. Setting up safety procedures is not enough. All staff should understand why these procedures are necessary and use them.

3.2 Background

An organisation's safety culture is its general approach and attitude towards safety.

In a good safety culture, safety always comes first, and this will be apparent in the work that the organisation produces. Safety is built into the organisation's products, and its safety procedures support what is already being achieved.

A good safety culture may be achieved through a combination of sound safety policy set by management, awareness on everyone's part of the importance of safety in all activities, and motivation to put safety policy into practice.

This chapter provides guidance on fostering a good safety culture and explains the key role of an explicit safety policy in doing this. It describes the content of safety policy statements and how an organisation may implement them.

There are certain legal obligations on employers, relating to their safety policy. See volume 1 for further details.

This chapter is written for:

- directors and managers wishing to establish or improve the safety culture within their organisation.

3.3 The benefits of a safety culture

In an organisation with a good safety culture, everyone:

- is aware of the importance of safety;
- makes safety the highest priority in all that they do;
- continually strives to improve safety; and
- understands the parts of the law and other regulations that are relevant to them.

The benefits of nurturing a good safety culture are that:

- safety is built into the organisation's products and services;
- potential hazards and failures are detected and eliminated or controlled early;
- the organisation's products are safe and visibly so;
- the organisation realises efficiencies and cost savings; and
- the risk of not conforming to legal obligations is reduced.

A good safety culture will enhance an organisation's reputation, whereas a single major incident can ruin it. Indeed a major incident can mar the reputation of the industry as a whole, and cause harm to many of the interdependent organisations that contribute to and rely on the industry's success.

Richard Profit, in his book '*Systematic Safety Management in the Air Traffic Services*' [F.2], specifies other significant benefits to an organisation's business of creating a good safety culture (page 19). This book is recommended for further reading on ESM.

3.4 Safety policy

The starting point for a good safety culture is a commitment on the part of management. This is best expressed by the setting of a safety policy, endorsed by the board of directors. A safety policy should state the organisation's aims for achieving safety.

The safety policy statements should define the fundamental approach to managing safety within the organisation. They should encompass both process and product safety issues. It is up to each individual organisation to define their own set of safety policy statements, according to the nature of their business. However, the safety policy statements should cover the following issues:

- confirmation that safety is a primary goal for the organisation;
- definition of management's responsibility and accountability for safety performance;
- the responsibility of everyone in the organisation for ensuring safety;
- the provision of assurance that products meet safety requirements;
- the continual improvement in safety within the organisation;
- compliance with regulations and standards; and
- the reduction of risk 'so far as is reasonably practicable'.

These last two points are linked, since the '*Health and Safety at Work etc Act, 1974*' requires the reduction of risk 'so far as is reasonably practicable'. However, this should be explicitly confirmed in the organisation's safety policy.

Absolute safety cannot be guaranteed and attempting to achieve it can distort the allocation of resources, so safety should be balanced against other factors.

This means that:

- although safety should be a primary goal, it is not the only goal;
- pursuit of safety at all costs is not advisable; and
- judgement is required to know when to stop trying to reduce risk.

Some examples of other organisations' safety policy statements are given in appendix D.

By defining the safety policy statements, ensuring that they are effectively implemented, and monitoring their effect on safety and on the organisation, it is possible to encourage and develop a good safety culture. Setting safety policy statements alone is not enough. Management should nurture and encourage good safety practices, monitor safety, and provide the necessary resources.

3.5 People's responsibilities within a safety culture

A Safety Authority is commonly appointed to take on the role of initiating, implementing, and maintaining an organisation's safety culture and its safety policy.

Everyone within an organisation, from the board of directors down, is responsible for understanding the importance of safety, following the safety policy, and incorporating it into their everyday activities.

Roles and responsibilities for specific activities within ESM are described in chapter 2.

3.6 Putting safety policy into practice

The board of directors of an organisation should ensure that:

- there is management commitment to following the safety policy;
- everyone in the organisation is aware of the importance of following the safety policy;
- the necessary training and resources are provided;
- the way that the organisation performs ESM is monitored and improved;
- the safety of the organisation's products is monitored and improved;
- the organisation is regularly audited to assess its performance with regard to safety.

Awareness is a key factor in the successful implementation of safety policy. Everyone in the organisation should be aware of the importance of safety and of the organisation's safety policy. The methods for achieving this will vary according to the size and type of the organisation. It may be possible with smaller organisations to provide direct briefing of the safety policy. With larger organisations, cascade briefing may be more practical.

Management should put in place procedures to implement the key components of safety policy. Resources for ensuring successful implementation of safety policy should be made available. This will include personnel with suitable background and training, as well as equipment.

Management should provide the opportunity and motivation to all staff to improve the safety of their work.

3.7 How to monitor safety policy

Management should check that the safety policy is being implemented. Typically this will be done with a rolling program which ensures that every aspect of the policy is monitored over a period of a few years.

Typically an aspect of the safety policy is monitored on a random selection from all the relevant activities of the organisation. In some cases it may be sufficient to carry out a simple inspection of these activities. In other cases it may be appropriate to commission a formal audit. The guidance on safety auditing in chapter 14 may be used as a basis for such an audit.

Management should check that the findings of inspections and audits are acted upon.

The way in which the safety policy is implemented should be regularly reviewed to check that it is consistent with good practice which evolves over time.

Management should provide an environment in which staff feel able to bring safety shortcomings to management attention without fear of recriminations.

3.8 Related guidance

Roles and responsibilities for specific activities within ESM are described in chapter 2.

Guidance on safety auditing is provided in chapter 14.

Some example safety policies are presented in Appendix D.

Chapter 4

Competence and Training

Your organisation must make sure that all staff who are responsible for ESM activities are competent to carry them out. Your organisation must give them enough resources and authority to carry out their responsibilities. Your organisation must monitor their performance.

4.1 Guidance from volume 1

Staff should have the proper training, technical knowledge, skills, experience and qualifications for their job.

4.2 Background

Anyone doing safety-related work should be competent to do the work.

To be competent, you must have the necessary training, technical knowledge, skills, experience and qualifications to do *a specific task* properly. Competence is not a general reflection on someone's overall abilities. Just because you are not yet competent for a specific task does not mean that you are an incompetent person. And conversely, being competent at one task will imply little about your competence for another, unless the two tasks are very similar.

There are two primary obligations on you if you are assigning or accepting a safety-related task:

1 You should know your limitations and not go beyond them.

2 If you are assigning people to safety-related work, then you should ensure that they are competent for that work.

The first obligation is a requirement of the codes of practice of several professional institutions. For instance the British Computer Society Code of Conduct requires that 'Members shall only offer to do work or provide service which is within their professional competence.'

The second obligation is a legal duty in certain circumstances. See volume 1 for further details.

This chapter of the Yellow Book is concerned with the competence of individuals (chapter 5 talks about suppliers). It provides some general guidance on the following aspects of assuring the competence of staff:

1 specifying requirements for staff competence,

2 assessing personnel,

3 training,

4 monitoring.

This chapter is written for:

- those responsible for assigning safety-related tasks to staff, and
- anyone otherwise assessing the competence of staff.

4.3 Specifying competence requirements

Chapter 2 described how to allocate and document the responsibilities for safety-related work. From these responsibilities, you should derive and document criteria for knowledge, skills, experience and qualifications that are necessary to carry out the work.

Consider setting requirements on:

- education (for instance, relevant degrees or attendance at specific courses),
- professional status (for instance, Chartered Engineer), and
- experience (for instance, three years involvement in safety or quality auditing).

However do not restrict yourselves to requirements, like those above, which are easily assessed, but try and set criteria for the minimum fundamental skills and knowledge that are required to perform the task.

Many tasks require more skills and knowledge than any one person possesses. In that case they will have to be tackled by a team and you should specify the required collective competence of the team as a whole.

In addition to project-specific and non-safety criteria, Project Managers on safety-related projects and Project Safety Managers should generally:

- have received training in ESM; and
- be a Chartered Engineer or full member of another professional organisation.

Anyone taking a leading role in the design or operation of a safety-related system should be familiar with:

- the applicable law and standards, and
- current good practice.

Some tasks may also require certain personal attributes such as the resolve to resist any pressure to compromise safety,

4.4 Assessing competence

Before someone is assigned a safety-related task, they should be assessed to decide whether or not they meet the criteria set for that task. This initial assessment should be documented and kept, along with any supporting evidence. This evidence may be required for the following reasons:

- as part of a Safety Case,
- for an independent safety assessment, or
- in investigating an incident.

The assessment is usually done by the individual's manager or a third person but it is usually most effective to work with the individual.

Assessment of education, experience and professional status can be checked by direct reference to CVs, which should be kept on file. Examinations or other tests may be used to assess general skills and knowledge, but it is generally more useful to refer to evaluated performance on similar tasks.

It is sometimes useful, or even necessary, to assign a safety-related task to someone who does not yet fulfil the requirements to perform it, but who is likely to gain the necessary qualifications (perhaps through performing the task). This is acceptable, provided that they work under the supervision of an experienced mentor who does fulfil the requirements. The mentor should be accessible to the person being supervised and should take overall responsibility for the work.

All of this guidance applies as much to individual contract personnel as to employees (although the selection of suppliers to take on specified tasks is covered in chapter 5).

4.5 Developing competence

Those responsible for staff training should make sure that staff skills and knowledge are kept up-to-date. It may be necessary to arrange specific training for the work that they need to do.

Training does not just include formal courses but also distance learning packages (such as those provided by the Open University), computer-based training and on-the-job coaching from senior staff.

Several professional organisations (including the IEE, IMechE and BCS) provide continuing professional development schemes which can help in selecting appropriate training. Professional engineers are expected to maintain their professional competence through self-managed continuing professional development but the concept is of value to other professionals as well. The schemes generally provide individuals with mentors who periodically assist the individual to sets plans for their learning needs and to monitor progress against previous plans. Each individual maintains a log book in which he or she records planned and actual professional development. Some schemes also provide guidance on the sort of training and experience which should be acquired for different types of work and levels of seniority.

If your organisation is arranging its own training then providing certificates of attendance or of passing a final test can make it easier to assess people later (see section 4.4). Certificates should have a limited life.

4.6 Monitoring

Most organisations have periodic evaluations of staff performance for business reasons. These evaluations are particularly important for staff performing safety-related work, to re-assess their level of competence for this work. This re-assessment provides information on any additional training that they may need, or whether the person is not suited to this role and should be transferred. Feedback on performance may also come from audits and assessments and from incident evaluations.

In the case where a person performing a safety-related task needs to be replaced or retrained, it is necessary to act quickly but with sensitivity.

4.7 Transitional arrangements

When introducing a more formal approach to assessing competence, it may be found that the most experienced and capable personnel have not been through the training programme that would be required for someone new taking on their job. This does not mean that they should not continue in their roles, and in fact they may be required to coach more junior staff.

A proven track record in a job is the most direct evidence of competence. It is normal under these circumstances to write some transitional arrangements into the training criteria, which exempt some existing staff from the formal criteria for their current job. However, it is necessary to show not just that the individuals have held the post for a period of time, but also that their performance has been satisfactory during that period.

4.8 Review and audit

Management should arrange to periodically review and/or audit the competency arrangements to check that they are being put into action as planned and that they are effective. If necessary, improvement actions should be defined and implemented.

4.9 Related guidance

Chapter 2 provides guidance on defining responsibilities

Chapter 5 provides guidance on selecting contract organisations to carry out safety-related work.

At the time of writing two organisations had issued draft guidance in this area which may be valuable further reading.

- HMRI had issued draft guidance on competence management and assurance which describes principles and factors to consider when setting up a system to manage competence.
- The Institution of Electrical Engineers, in collaboration with the British Computer Society, had issued a set of competency statements for safety-related functions and tasks.

Chapter 5

Working with Suppliers

Whenever your organisation contracts out the performance of ESM activities, it must make sure that the supplier is competent to do the work and can put these fundamentals (including this one) into practice. It must check that they do put them into practice.

5.1 Guidance from volume 1

A supplier is anyone who supplies your organisation with goods or services. You can share safety responsibilities with your suppliers but you can never transfer them completely.

This fundamental is needed to make sure that the other fundamentals do not get lost in contractual relationships. Your organisation will set specific requirements from these fundamentals, which are relevant to the work being done, before passing the requirements on to the supplier. You do not have to pass them on by writing them into the contract, though this is normally a good idea.

5.2 Background

This chapter is concerned with the situation where safety-related tasks are contracted out to another organisation. It is not concerned with contract personnel who work under your organisation's supervision (chapter 4 is relevant to that case).

Contracting out a safety-related task does not relieve your organisation of all responsibilities for that task. It is your responsibility to make sure that the supplier is competent to do the work. This responsibility is made clear in the Engineering Council's 'Guidelines on Risk Issues' [F.3] and is a legal duty in some circumstances. See volume 1 for further details.

The contractor should also be required to adopt good ESM practice and they should be monitored to ensure that they do.

Your organisation should also inform the supplier about hazards, risks and safety requirements which are relevant to their work. This obligation is considered further in the next section.

This chapter is written for:

- senior management or Project Managers, who are considering contracting other organisations to perform safety-related work.

5.3 Assessing suppliers

In the language of the '*Construction (Design and Management) Regulations 1994'*, a supplier assessment should be 'proportional and appropriate' to the risks involved in the work. It need not be extensive where the requirements are straightforward but it should be written down and put on file.

Criteria should be set for the capabilities that a supplier should have to perform the tasks satisfactorily. Typically these will include requirements that the supplier has:

- a suitable organisation with competent personnel;
- the necessary equipment which is properly maintained;
- a suitable health and safety policy appropriate to the work;
- an ability and commitment to undertake suitable and sufficient risk assessments;
- an effective Engineering Safety Management System to control the risks identified;
- the competence to deliver the contract.

Evidence should then be collected that the supplier meets these criteria. The following evidence may be required:

- a pre-tender safety plan;
- responses to a questionnaire;
- a copy of their safety policy and procedures;
- details of their accident and incident records;
- training records;
- CVs for the staff who will be performing the work;
- QA procedures;
- project review and monitoring documents;
- details of previous experience;
- references from other customers.

For complex tenders, a pre-selection procedure might be appropriate, with a detailed assessment of those who are short-listed.

Where your business involves contracting out the same sort of work repeatedly, it may save time to have a list of pre-assessed approved suppliers. If this is done, the list of approved suppliers should detail the type of work that each supplier has been approved for.

The safety performance of suppliers should be recorded and taken into account if the supplier bids for further, safety-related work.

5.4 Specifying and monitoring work

You should produce written specifications of all safety-related work to be done by suppliers and check that the suppliers meet these specifications.

For simple requirements it may be sufficient to directly inspect the work being done or the deliverables being produced. Additional deliverables may also be specified such as audit and assessment reports, which may be used to check compliance. In other cases a direct audit or assessment of the work may be needed, either by your organisation, or by contracting a third party to do this. If a direct audit or assessment is required, then the necessary access to the supplier's information, people and premises should be specified in the contract.

You should check that the supplier acts on the findings of any inspection or audit.

5.5 Related guidance

Chapter 4 provides guidance on assessing the competence of contract personnel who work under your supervision.

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Chapter 6

Communicating and Co-ordinating

If your organisation has information that someone else needs to reduce risk, your organisation must pass it on.

Whenever your organisation is working with others on one change, they must co-ordinate their ESM activities.

6.1 Guidance from volume 1

Safety-related information may include problems you find in someone else's work, or assumptions about someone else's work which are important to safety. Your organisation should pass on any relevant information about hazards and safety requirements to its suppliers.

There are specific legal obligations in the area of co-ordinating activities, for instance regulation 9 of the *'Management of Health and Safety at Work Regulations 1992'.*

6.2 Background

Safety issues do not respect organisational boundaries. Effective communications and co-ordination are often needed to resolve them.

The responsibility to pass on information or to co-ordinate activities with others is a legal duty in certain circumstances. See volume 1 for further details.

Railway Group Standards bring obligations on those involved in the UK mainline railway to share information:

- Group Standard GM/RT2250, 'Safety *Performance Monitoring and Defect Reporting of Rail Vehicles and Plant and Machinery'* requires Railway Group members to submit reports of safety-related defects to a centralised repository, managed by Railtrack, and to share details of safety-related defects with of other members of the Railway Group.

The Engineering Council '*Code of Professional Practice on Risk Issues'* also places a professional obligation on all engineers to:

> 'Communicate effectively with colleagues, both up and down the chain of responsibility, to help ensure that risk management activities are sufficiently comprehensive and understood.
>
> 'Endeavour to raise awareness of potential hazards and risk issues among your colleagues.
>
> 'Seek to ensure that all those involved with a project are aware of any risks to which they may be exposed, of any relevant limitations inherent in the design or operating procedures, and of any implications for their conduct.
>
> 'Discuss the reasons for incidents and near misses with your colleagues, so that lessons can be learned.'

This chapter is written for:

- managers and engineers who have safety-related information that is required by someone else or who need to work or liaise with others in the interest of safety.

6.3 What to communicate

Your organisation should make arrangements to pass on the following sorts of safety-related information to people who need it to reduce risk:

- hazards, risk and arrangements to control them;
- limitations on the products and systems that your organisation makes and any implications for users and maintainers;
- lessons learned, relating to safety; and
- safety-related information about your products, principally to your customers.

In particular, you should make sure that any of your suppliers who are doing safety-related work have all relevant information regarding:

- hazard identification and risk assessments that you have carried out;
- strategies that you have defined to control risk; and
- safety requirements that you have established.

If any of this information changes, then you should make sure that you inform your suppliers of the change promptly.

If one of your suppliers tells you about a safety issue that other suppliers should be aware of then you should pass the information on.

Your organisation should put in place arrangements to capture and record this sort of information, to decide who should receive it, and to make sure that they do receive it.

6.4 Communication within your organisation

There will probably need to be several different processes for communicating different sorts of information. Do not feel restricted to using formal documents (such as memoranda, user manuals, Safety Case, Hazard Log). You may find it effective to communicate information by:

- face-to-face briefings,
- informal documents (such as newsletters, bulletins, electronic mail),
- audio-visual packages,
- training.

Whatever method you choose, you should make sure that it is auditable.

6.5 Communication between organisations

Initially it is usually a good idea to pass information on verbally, so that misunderstandings can be quickly resolved. However communication of safety-related information should be done auditably, so it should be confirmed in writing afterwards.

Considerations of commercial confidence and the expense of providing certain classes of information can make passing necessary information around slow and expensive. To avoid this happening, it is often a good idea to enter into non-disclosure agreements and to agree who will pay for what at the outset of any partnership.

6.6 Co-ordinating under normal conditions

Cross-organisation working groups with a focus on safety are commonly set up in military projects (see DEF-STAN 00-56 [**Error! Cannot open file.**] and MIL-STD 882C [**Error! Cannot open file.**]).

If several organisations are involved in a project then the lead organisation should set up such a working group and involve all other interested parties including users, maintainers and suppliers.

The working group should be given clear terms of reference. It should have the authority to resolve straightforward issues directly, but will need to escalate issues which have a complexity outside its scope, or which are outside its authority (often where significant, unplanned resources need to be expended).

It can be useful to maintain a database of safety issues and to track their resolution.

All co-ordination arrangements should be put in writing so that they can be audited.

6.7 Co-ordinating under emergency conditions

If your organisation potentially has to deal with an accident or emergency, then it should have contingency plans in place to co-ordinate responses with others to do this:

- your organisation will need to have arranged, in advance, lines of communication and control and have set up dedicated communications facilities (such as land lines or radio communications);
- your organisation should have agreed arrangements in place for dealing with emergency services and for communicating with the general public and the media; and
- your organisation may wish to set up joint exercises with the people you will have to deal with, if there is the realistic possibility that you may have to deal with a catastrophic incident.

6.8 Related guidance

Chapter 2 provides guidance on the transfer of responsibilities. There are requirements for making sure that whoever takes on responsibility is properly informed.