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Safety management within different cultures

In past, for Rail, Safety management was a local object that was included within national culture, and often within a single company culture. But the impulsion given by Europe, the creation of ERA, the split between Infrastructure manager and Railway undertaking and the development of international Public transport Groups, like Keolis, is modifying the approach to safety : Safety management system has got to fit to different cultures (companies cultures as well as national culture). This paper seeks to describe this problematic, and the experience gained by Keolis on this question.

We will first, through some examples, present some of the new challenges that multi national companies are creating. We will describe the approach build step by step by Keolis, and some lessons learnt that can be share with the Rail Industry.

1. The challenges created by international rail companies

Rail operation is by essence a local operation. The former organisation in Europe, with national companies, means that the Rail operation was within the same cultural boundaries. There were some exceptions, with for example the operation of international traffic. But it was a complex operation, where changes were to be done at the boundary. For example, you had to change the locomotive and the driver, limiting interoperability.

The development of the European high speed network has created new trans-national operation (for example with Eurostar, or Thalys).

For Keolis, the situation is slightly different. We are operating a collection of local operations. But at group level, we have got to manage some trans-cultural interactions. Here are some example of the issue we have face :

a. Organising Benchmark

Some years ago, we organise KPIs for the group. One of these indicators was the number of SPAD (signal passed at danger) per million kilometres. The comparison between our subsidiaries was very interesting; but it was creating the "here, it is different answer". Instead of using this information in order to push for some improvements, some subsidiaries were putting energy to explain why, because of specific conditions, their score was different from the other. Although this question of benchmark is a delicate question, we need to overpass it in order to build some proactive reaction of the different persons involve.

b. Implementing the SMS

The implementation of the SMS (Safety Management System), was done earlier in some countries compare to some other. In Germany, for example, this change was more challenging than in other countries. In the former system, the Safety responsibility was linked to the presence of the EBL (Eisenbahnbetriebsleiter). The EBL was personally responsible on safety matter. The implementation of the SMS meant transfer of responsibility (and as a consequence, lost of responsibility for the EBL). When every EBL was conscious to be responsible in any case, you can imagine this radical change was not straight forward. The same reaction happened when Keolis headquarter become more prescriptive on Safety. The EBL was fearing some conflicts, uncertainty between directive coming from EBA, and demands coming from headquarter.

c. Mobile phone usage

The third example concerns the use of mobile phone. We organised some exchange of best practises. For example, we analysed some accidents, whose cause was a bad usage of mobile phone. As a consequence, in our operations in the USA, the rule is very clear. Mobile phone is strictly forbidden for rail personal on board the train. This rule is perhaps extreme, as for a conductor, to have a mobile can be useful when a passenger is ill on board the train, but as this rule is imposed by our infrastructure manager, we have got to apply it in the US.

But do we have to be so strict everywhere ? is it the headquarter role to define such rule, or do we give some flexibility at subsidiary level?

All these examples show the difficulty, but also the richness of working in an international group. Bringing some value from headquarter means to overcome any of these difficulties. The First step was to establish an international safety policy.

d. The multi-cultural challenge

The fact to manage safety through different culture is new. Keolis has organised an assessment[1], in order to understand the different logics applying in different system. The table below gives a summary of their findings :

USA	Approach based on applying FRA rules. Detailed check-list; taking into account human factor
Australia	Risk analysis and management as a priority. (ALARP – As Low as reasonably Practicable
Germany	EBL (Eisenbahnbetriebsleiter) center of the system. Focus on competencies, processes and training
Sweden	Focus on Health and safety. Working with the union
France	CHSCT is key (Health and safety committee, involving union). Respect of Standard. GAME principles

2. The Keolis principles

a. Reaching the good level of autonomy and empowerment

The choice done by Keolis was very clear. It is clear for us that the subsidiaries have got to be completely responsible. This is for several reasons. We are only operator, and the safety level is linked to the whole system, including the infrastructure. The operator has got to adapt to the infrastructure manager, on organisation, technology point of view.

We believe also that in many countries, many systems, the track record concerning Safety Performance for Rail Transport is very high. We want to be sure that our decision will help adding value, strengthening these systems. We do not want to put at risk a system that we do not know fully in detail from headquarter. We have made an internal survey concerning safety culture. It demonstrates clearly that in each country, the safety approach is still very different :

We think also that to be efficient, our people have got to be fully empowered, fully responsible.

b. Sharing our understanding of the risk

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[1] Study organise during summer 2012, with the support of Arthur d Little. The results are based on interview and visit of 8 samples subsidiary, through 5 different countries, and a web survey with more than 250 answers.

But delegating the safety responsibility is not so easy. We need to be sure that this responsibility will be well handle by the subsidiary. This is only true if there is, in the subsidiary, a good understanding of the risks.

We can only trust an organisation if this organisation is cautious of the risk. In the example of the mobile phone, that means that, as soon as the local safety manager is conscious of the risk created by new behaviour with the mobile phone, he can make himself the good decision, and define the good process in order to manage the risk in his subsidiaries. Like this, the safety manager can also adapt his decision to local constrains.

This principle echoes some very simple management rule : you can only delegate one responsibility if it is well understood. You can only delegate the management of the risk, if this risk is well understood. What is important is to decline this principle, by developing a risk approach that is shared within the company. This means regular training, communication, in order to establish a common vocabulary.

c. Controlling

The consequence of the delegation is the control. When giving some capacity of autonomy, you have got to control that it is well used.

For Keolis, this will mean establishing some reporting system, with common KPIs, in order to detect any negative evolution

That means also organising detail audit of local safety management system. This was often a surprise for local people, who were reacting by the fact that the Safety Agency has already done some audits. But our audit were always an opportunity to have a better understanding of local issues. These audits are always done with local experts, in order to take into account the local dimension. (interface with infrastructure and local habits)

d. Creating the tools for autonomy

Being autonomous does not mean that you are alone. In fact, it is important, as safety manager not to be isolated. By having regular meetings on safety, Keolis provide a support network, that is useful when facing some difficult situation.

It is clear also that autonomy is offered to persons who are selected for this goal. Keolis assist them through different training, and the cascading best practises.

3. The foundation of Keolis organisation

All this principles are implemented through different processes, and controlled by different bodies. Without going in all details of our organisation, I will describe you in the following lines our main process, The Rail Safety Policy, them the role of our safety committee, and the contribution of hierarchical line.

a. The creation of the Rail Safety policy

Keolis has implemented a Rail Safety policy 8 years ago. This policy was the opportunity to implement the first principle, concerning autonomy and responsibility.

Keolis has chosen to develop a safety policy, at group level, not a safety management system. The Safety management system has to be developed at the subsidiary level. This is a consequence of our choice to have clear responsibility at subsidiary level. The local management is in charge of the SMS. Their responsibility is very clear. The group is only responsible of a policy

The Keolis Rail safety policy described the activities of the group round the following items :
- compliance with EU Standard
- Risks management
- Insurance
- The local SMS
- Safety critical employees
- Safety performance review
- Monitoring and reporting
- Emergency plan
- Audit programme
- Safety Communication

This policy is consistent with European legislation. This work being done by ERA is creating the room for more synergies between the different cultures. ERA impulsion is facilitating the deployment of the Keolis policy, by creating a common approach, a consistent vocabulary for safety.

We have seen this positive effect when working with EBA on the construction of our SMS. They told us we were in advance compare to some competitors, and the impulsion given by our policy was one reason for this.

Our policy supports the principle described below. After the question of autonomy, it set the path for Risk Management, training program, organise audit plan…

b. The Group Safety Committee

The table below describes the 3 level of responsibility for Safety. The group safety policy is a key body to give the impulsion at group level. It meets twice a year. Participants are department from head quarter involve in safety, as well as all operation managers and safety managers of our subsidiaries.

The goal of these meetings is to organise and enlarge the circulation of information, including exchange on the risks, and on best practises. Group Safety Committee is also in charge of validating all changes to the policy (improving reporting..), and monitor with attention the corrective plan (action plan organise when a risk is detected through audit, or lesson learnt process.

One important parameter on this sort of meeting is that you need to work for long term, in order to build trust between the different participants. We are talking about safety, through different culture. The easiest behaviour for each participant is the protect himself, hiding some information. Time, and trust, is the best way to overcome this difficulty
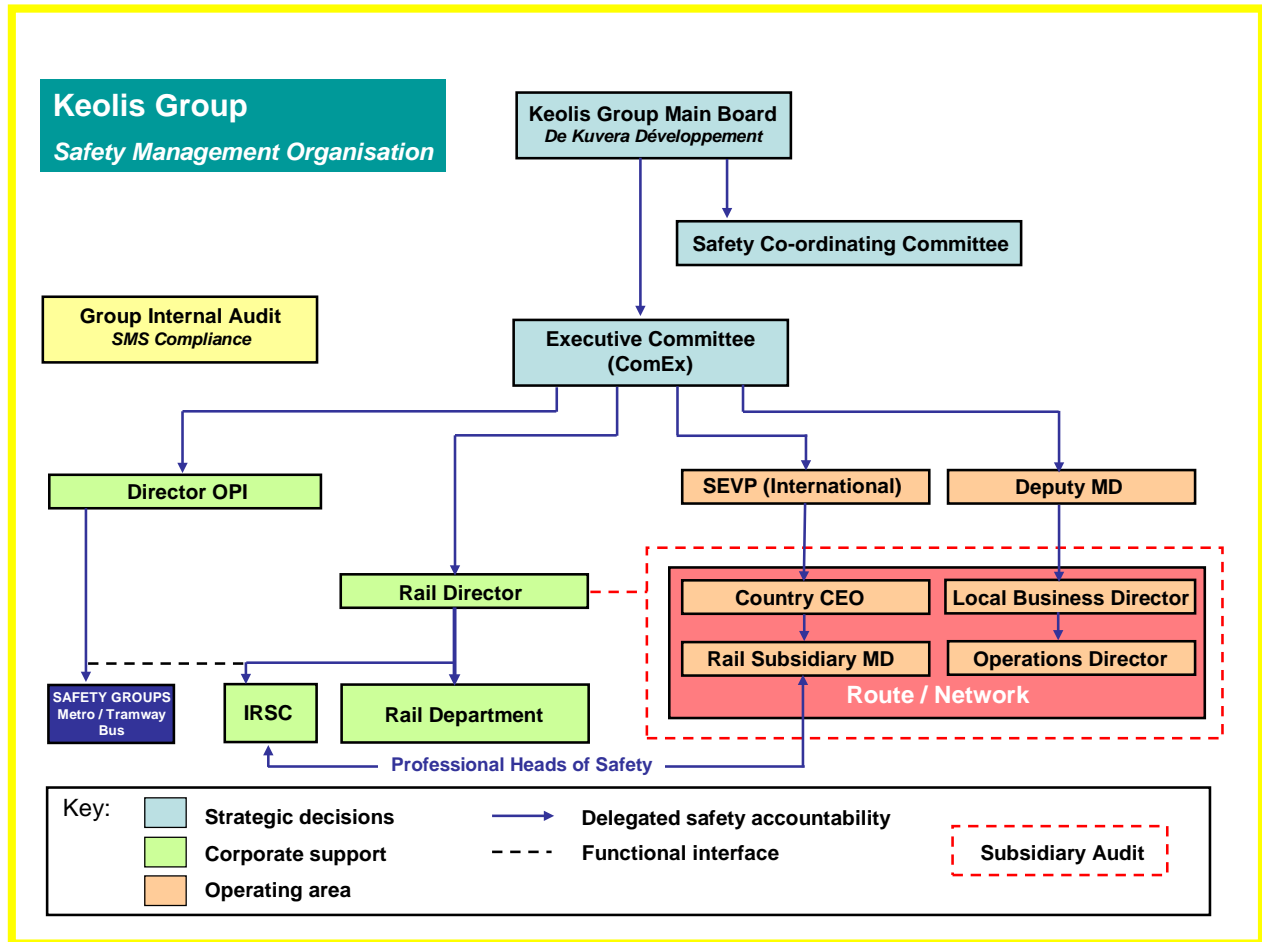
Keolis Safety Organisation

c. The role of hierarchical line

The responsibility relies in the subsidiaries. But of course, the role and contribution of the hierarchical line is key to achieve our goals. Their first contribution is to show personal commitment to safety. We all know that leadership is the clue of a good safety culture.

To demonstrate this involvement, we are asking the manager to put regularly safety on the agenda of their meeting with their operation director. We are following the reporting, asking for annual action plan.. This impulsion is key, and we think this is one point where we can improve our system.

Keolis Group
Safety Management Organisation

Keolis Group Main Board
De Kuvera Développement

Safety Co-ordinating Committee

Group Internal Audit
SMS Compliance

Executive Committee
(ComEx)

Director OPI

SEVP (International)

Deputy MD

Rail Director

Country CEO

Local Business Director

SAFETY GROUPS
Metro / Tramway
Bus

IRSC

Rail Department

Rail Subsidiary MD

Operations Director

Route / Network

Professional Heads of Safety

Key:
- Strategic decisions — Delegated safety accountability
- Corporate support — — — Functional interface — — — Subsidiary Audit
- Operating area

4. conclusion

At the conclusion of this paper, one can realise that it is very easy to describe the theory, the principles. Of course, implementation creates some new challenges every day. We can still improve our system. At the moment, we concentrate on assessing our safety culture, and finding a way to strengthen it. We are working with Arthur d Little on this mission. Through detail analysis of some samples organisation, they are helping us to see our strength, and our weakness, and develop a plan for improvement.

Safety is a goal always in progress, never achieve. Our exposure to international business is enlarging our capacity to learn from one another, and we making sure we are building from this.