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RISSB Contact details:

Head office:

Phone:	Email:	Web:
(07) 3724 0000 +61 7 3724 0000	info@rissb.com.au	www.rissb.com.au

Standard Development Manager:

Name:	Phone:	Email:
Michael Maartensz	0400 580 414	mmaartensz@rissb.com.au

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SDM name	Michael Maartensz
SDM phone	0400 580 414
SDM email	mmaartensz@rissb.com.au

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Preface

This Standard was prepared by the Railway Operations – Management of Change Development Group, overseen by the RISSB Safety & Operations Standing Committee.

The major changes in this edition are as follows:

(a) The inclusion of the regulatory requirements for managing change under the rail safety national law and formal notification requirements.

(b) Inclusion of methods for scaling change to ensure the right level of support is provided to manage risks to SFAIRP.

(c) Guidelines for conducting a change impact assessment to determine the level of impact to people, systems and the organizational structure.

Objective

The objective of this Standard is to describe the requirements for rail organizations to determine the level of impact associated with changes to their railway operations and manage any identified risks so far as is reasonably practicable (SFAIRP).

Compliance

There are four types of provisions contained within Australian Standards developed by RISSB:

(d) Requirements.

(e) Recommendations.

(f) Permissions.

(g) Constraints.

Requirements – it is mandatory to follow all requirements to claim full compliance with the Standard. Requirements are identified within the text by the term ‘shall’.

Recommendations – do not mention or exclude other possibilities but do offer the one that is preferred. Recommendations are identified within the text by the term ‘should’.

Recommendations recognize that there could be limitations to the universal application of the control, i.e. the identified control is not able to be applied, or other controls are more appropriate or better.

For compliance purposes, where a recommended control is not applied as written in the standard it could be incumbent on the adopter of the standard to demonstrate their actual method of controlling the risk as part of their WHS or Rail Safety National Law obligations. Similarly, it could also be incumbent on an adopter of the standard to demonstrate their method of controlling the risk to contracting entities or interfacing organizations where the risk may be shared.

Permissions – conveys consent by providing an allowable option. Permissions are identified within the text by the term ‘may’.

Constraints – provided by an external source such as legislation. Constraints are identified within the text by the term ‘must’.

RISSB Standards address known hazards within the railway industry. Hazards, and clauses within this Standard that address those hazards, are listed in Appendix A.

Appendices in RISSB Standards may be designated either “normative” or “informative”. A "normative" appendix is an integral part of a Standard and compliance with it is a requirement, whereas an "informative" appendix is only for information and guidance.

Commentary

Commentary *C Preface*

This Standard includes a commentary on some of the clauses. The commentary directly follows the relevant clause, is designated by 'C' preceding the clause number and is printed in italics in a box. The commentary is for information and guidance and does not form part of the Standard.

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Section 1 Scope and general

1.1 Scope

This document provides a structured approach for managing, evaluating and implementing change within a railway operating environment in accordance with the requirements of the Rail Safety National Law (RSNL). Management of change is a formal process used to ensure that any proposed change is evaluated for its impact to safety and legislative compliance prior to being implemented. This approach includes the identification of risks associated with the change, the impact levels of the change, stakeholder consultation, the allocation of responsibilities and the provision of training and instruction for those who could be affected by change.

This document is applicable to RTOs, contractors and other organizations that implement any change that is likely to impact on the safety of the railway operations.

1.2 Normative references

The following documents are referred to in the text in such a way that *some* or all of their content constitutes requirements of this document:

- *Rail Safety National Law (South Australia) Act 2012*
- *Rail Safety National Law National Regulations 2012*

NOTE:

Documents for informative purposes are listed in a Bibliography at the back of the Standard.

1.3 Defined terms and abbreviations

For the purposes of this document, the following terms and definitions apply:

1.3.1
change
alter, vary, modify, mean to make or become different

1.3.2
change management
structured process of transitioning an organization, its teams and individuals from a current state to a desired future state, with a focus on minimizing disruption and maximizing adoption of the change

1.3.3
management of change (MoC)
structured process used to identify, assess and manage the impacts of changes within an organization, such as a railway operating environment

1.3.4
change agent
individual or group that facilitates, supports and promotes organizational change

1.3.5
ONRSR
Office of the National Rail Safety Regulator

1.3.6
railway operations
railway operations as defined in Rail Safety National Law

1.3.7
RSNL

Rail Safety National Law

1.3.8
RSW
rail safety worker as defined in Rail Safety National Law

General rail industry terms and definitions are maintained in the RISSB Glossary. Refer to: https://www.rissb.com.au/glossary/

Section 2 Management of change

2.1 Management of change requirements under the RSNL

Under Clause 12, Schedule 1 of *Rail Safety National Law National Regulations 2012*, RTOs must have procedures for ensuring that changes that could affect the safety of railway operations are identified and managed SFRAIP.

RTOs must ensure that:

(a) changes are fully identified and described in the context of the railway operations;

(b) affected parties are identified and, if practicable, consulted;

(c) the roles and responsibilities of rail safety workers and employees of the rail transport operator are clearly specified with respect to the change;

(d) the rail safety workers and employees of the rail transport operator are fully informed and trained to understand and deal with the proposed change;

(e) the requirements of Section 99(1)(c) and (d) (Safety management system) of the RSNL are observed in relation to any risks associated with the proposed change; and

(f) the change, once implemented, is reviewed and assessed by the rail transport operator to determine whether or not the change has been appropriately managed.

Any change within an RTO's railway operations as defined in the RSNL must be subject to a review to determine whether the change is within the RTO's permitted operations and conditions.

Any proposed change that is not included as a permission within an RTO's notice of accreditation shall require a variation and must be approved by ONRSR before the implementation of the change.

RTOs should contact ONRSR early in the process to confirm any regulatory requirements.

Under Part 2, Section 9 of the *Rail Safety National Law National Regulations 2012*, RTOs must notify ONRSR of any changes to prescribed conditions and restrictions within their notice of accreditation.

Commentary C2.1

For the purpose of rail safety management, change includes any aspect of development, operations or maintenance that has the potential to alter existing risks or introduce new hazards.

2.2 Resources

RTOs should allocate sufficient resources with clearly defined roles and responsibilities commensurate with the complexity and scale to manage the change. RTOs shall nominate a responsible person(s) with an appropriate level of skills and knowledge to manage change across each stage of its lifecycle.

The following roles should be allocated to support the change lifecycle:

(a) A change lead or change facilitator.

(b) Impacted stakeholders to review, endorse and approve change processes.

(c) Senior management for oversight and monitoring, as well as endorsement of complex or system level change.

Persons managing change should apply the following:

(d) Communication and engagement for the ability to listen and be adept at communicating at all levels within the organization and with external parties.

(e) Systems thinking to have a clear understanding of the organization and the likely impact the change could have.

(f) Project management at an organizational and individual level for the ability to keep the project moving forward, reporting on progress and keeping key stakeholders informed.

(g) Risk management to facilitate or engage with internal risk teams to identify risks associated with the change and manage risk actions through the change.

(h) Prioritization to understand which changes to flag as priority due to higher complexity or risk.

(i) Escalation for understanding of how to manage and escalate issues for resolution.

Commentary C2.2

Effective management of change (MoC) requires a variety of people throughout the process to actively fulfil specific roles of leadership, education, review and assessment of the change.

2.3 Identifying the context for change to railway operations

Changes that are likely to impact on an RTO's railway operations shall be monitored, assessed, and adjusted through the change management lifecycle. Where a change has the potential to impact the safety of railway operations, a structured change approach shall be followed. Examples include but are not limited to changes in:

(a) rolling stock, infrastructure, equipment or facilities;

(b) technology (e.g. signalling, IT, etc.);

(c) the work environment;

(d) process including work practices, policies and procedures;

(e) services, operational areas or the establishment of a new operational area;

(f) organizational structures and/or roles including relationships with key stakeholders such as contractors, suppliers or government agencies;

(g) business strategy or activity;

(h) the implementation of systems and procedures for the identification and consideration of interoperability matters relating to railway operations undertaken on the National Network for Interoperability (NNI);

(i) interfaces with other rail organizations and external third parties; and

(j) the regulatory environment.

A systemic approach to the MoC process should be adopted to ensure that the impact on all elements and their interfaces across their lifecycle are systematically identified, assessed, and controlled. RTOs should explore the impact of the change and scale the MoC process to suit the agreed impact.

2.4 Change impact assessment

A change impact assessment shall be used to determine the level of impact across people, processes, technologies and systems within the organization. The type of change identified can impact on different groups within the organization and should include timely communication, training and support to those affected.

Key steps in a change impact assessment should include the following:

(a) Define the changes and identify current versus future scenarios to gauge the levels of impact.

(b) Identify all stakeholder groups that will be affected by the change, this includes identifying when expertise is required to support the change, for example, human factors specialists, risk specialists.

(c) Analyze the degree and nature of impacts to people, processes, technologies and systems for each stakeholder group. The analysis can be informed by consultation with stakeholder groups.

(d) Classify and rank impact severity based on priorities using tools such as impact assessment matrices.

(e) Identify possible mitigation strategies and actions to be taken during planning to manage the reduce the negative impact related to the change.

(f) Formal review and approval from those responsible for managing the change.

A change impact assessment should identify:

(g) the type of change occurring within the organization;

(h) the parties that will be impacted by the change;

(i) the scope and scale of the change including the overall complexity;

(j) impacts to organizational safety and the potential for positive or negative changes to alter or introduce new hazards and risks as well as impacts to organizational safety and the potential to change (positively or negatively) or introduce new, hazards and risks;

(k) the nature and impact of the change and how it will affect people, processes, technology, systems and the organizational structure.

Support from human factors specialists and SMEs can assist in determining the level of complexity where the change relates to technology, equipment, work practices, safety critical communications and operation.

See Appendix B for a sample change impact table.

2.5 Change affecting rail safety workers (RSWs)

Any change that is likely to impact on RSWs shall be assessed to identify how the change will impact on worker competencies, work practices, job design and work related safety gaps.

RSWs shall be involved in designing changes to work practices/job design and provided with training and instruction to ensure that they understand the extent, nature and impacts of the change.

RSWs shall be involved in any design changes to work practices and job design.

RSWs that are affected by change will be provided with training and instruction to ensure that they understand the extent, nature and impacts of the change.

Impacts to RSWs can include, but not be limited to:

(a) the need to adopt new skills or knowledge;

(b) introduced or altered work tasks and processes;

(c) new or altered systems or user interfaces;

(d) altered work schedules;

(e) the implementation new tools, equipment and or facilities; and

(f) changes to the work environment or operating conditions.

These impacts should be captured and assessed when scoping and implementation planning for the change. The scale of impact, including whether across one group or multiple RSW groups, shall determine the level of monitoring, governance and assurance required to support the change.

2.6 Scalability

MoC activities should be scaled according to the level of impact arising from the change.

RTOs should scale change activities to ensure that the right level of support is provided to address the impacts and minimize the risks.

RTOs should conduct a change impact assessment to identify project characteristics such as size, type, complexity, risk and timing. A change impact assessment should provide the framework for understanding the scalability of the change and define the level of complexity.

A change that is assessed as complex shall require detailed levels of planning, governance and transparency for senior leaders and organizational risk owners. The degree of scrutiny and associated level of detail required at each stage shall be proportionate to the impact and risks introduced by the change.

Where a small change that is deemed low impact is identified, RTOs should utilize existing skills, knowledge and processes to manage the change if there is no significant impact to the organization. See Appendix C for a sample change scalability flowchart.

2.7 Risk management

Under Clause 16, Schedule 1 of *Rail Safety National Law National Regulations 2012*, RTOs must have systems and procedures for compliance with the risk management obligations set out in the RSNL.

RTOs must conduct assessments for identified risks in accordance with Section 100 of the RSNL. Any risks identified within the MoC process shall be documented and communicated in accordance with the requirements of the RSNL and the RTO's SMS requirements.

RTOs shall review and evaluate the change once it has been implemented.

Commentary *C2.7*

Risk management is a critical activity that supports the management and control of risks and hazards to ensure that they are identified, assessed, eliminated and managed SFAIRP. Due to the varying scope and nature of railway operations, differing approaches to risk management will be required to eliminate or minimize different types of rail safety risks arising from change.

Sound Robust MoC practices will enable RTOs to demonstrate an awareness of the sources of safety risks and hazards specific to their railway operations. The implementation of a formal risk register or hazard log will enable a RTO to identify, assess and control rail safety risks related to changes within their railway operations.

Section 3 Change management lifecycle

3.1 Overview

RTOs shall apply the following steps during the MoC lifecycle:

(a) Identify and describe the change and required resources and key stakeholders impacted by the change.

(b) Identify risks and assess their impact; It is at this stage that low-risk change can be identified and the MoC process limited.

(c) Conduct an impact assessment to assess the level of impact across the organization.

(d) Plan the change in detail, including the requirements for communication, training and instruction.

(e) Validate the change and get authorization to proceed;

(f) Implement the change.

(g) Monitor the change and review.

There are a range of activities that should be undertaken throughout the MoC process. These include, but are not limited to:

(h) the preparation of documentation to define and support each stage of the change lifecycle including include a change register, a risk register, or other appropriate means in the safety management system;

(i) the application of continuous improvement throughout the change lifecycle including regular review of change documentation, identification of lessons learnt from previous changes, and the capture and sharing of lessons learnt from the change activities;

(j) the application of Standards to ensure where appropriate, that the change is consistent with accepted codes or Standards or if a new Standard needs to be developed; and

(k) processes for consultation and communication, including stakeholder analysis to identify persons or organizations likely to be affected by the change.

The level of consultation should depend on the nature, size and impact of the change and could involve both internal and external parties. Stakeholders affected by the change shall be consulted and have input and ownership into the planning and design of the proposed change.

All decisions shall be transparent and formally accepted by those responsible for decision-making within the RTO.

3.2 Describe the change

To assess the significance of the change, the first step shall be to describe the change and its context within the RTO's activities. This should include developing the necessary plans for managing the change in consultation with stakeholders including any interfacing organizations that could be impacted in preparation for, during and/or after the change.

This shall be documented and provide detailed information regarding:

(a) whether the change requires notification under the requirements of the RSNL;

(b) the identification of the required resources;

(c) the reason for the change;

(d) roles and responsibilities for the change;

(e) who and/or what is affected by the change;

(f) a description of what is to be changed;

(g) when the change will occur;

(h) the engineering and operational interfaces that could be affected;

(i) potential business impacts, additional resources, additional expertise and competencies during construction activities that could require line closures or track occupations;

(j) project discipline involvement, procurement, design, construction/installation, maintenance, commissioning/testing, and de-commissioning; and

(k) the identification of any stakeholders including subject matter experts and those that are likely to be affected by the change.

The change shall be reviewed and amended as required in accordance with an implementation plan and updated with any additional requirements that are identified during other steps in the MoC process.

The description could alter due to factors such as changes in scope, changes in client requirements, increasing design definition or implementation of changes proposed by contractors and suppliers.

3.3 Assess the likely impacts of the change

The RTO shall conduct a change impact assessment to assess the level of impact across organization and identify those that are likely to be affected by the change. The impact assessment should analyze impacts to people, processes, technologies and systems and identify mitigation strategies to reduce the impacts of the change.

Any change that is likely to impact on RSWs shall be captured and assessed to identify potential changes to worker competencies and work practices.

MoC changes should be scaled according to the level of complexity, risk and timing. A change impact assessment shall provide the framework for understanding the level of support required to address impacts and risks introduced by the change.

See Section 2, Clauses 2.4 to 2.6 for detailed information regarding change impact assessments.

3.4 Assess the risks of the change

The RTO shall assess the risks arising, or potentially arising, from carrying out the change and document the controls. The risk assessment shall be carried out in accordance with the RTO's risk management procedures and the requirements of the RSNL (see Section 2.7).

When scoping the risk assessment, RTOs should consider whether the change is temporary, short term or long term and if future additional change states will be required. Complex changes could require multiple risk assessments on specific elements of the scope. As part of a risk assessment, the RTO shall keep a detailed record of all aspects of the assessment process.

Factors to support a risk assessment should include the following:

a) The identification of any risks associated with any interfacing systems, processes and/or procedures likely to be impacted by the change.

b) The identification of any risks related to interoperability matters.

c) The identification of any risks associated with matters such as human factors, fatigue, rail operations and the environment.

d) Any requirements to use only type approval items such as in signalling or other safety critical systems.

e) Understanding the impact of individual or cumulative hazards on the overall risk.

f) Making a comparison of the level of risk before and after the proposed changes.

g) Identifying any hazards that could impact on the change lifecycle.

Consultation shall be undertaken with persons likely to be affected by the change, including workers, health and safety representatives, union representatives, any other rail transport operators and, where appropriate, the public.

3.5 Plan the change in detail

RTOs shall ensure change implementation plans address the identified impacts and risks to the safety of railway operations and the outcomes of risk assessments. An implementation plan should include:

(a) details of any notifications required under the RSNL;

(b) how changes to operations, equipment, procedures and systems are communicated across the organization and to external stakeholders;

(c) requirements for instruction and ensuring people are trained and, where required, have the appropriate competencies;

(d) any additional resources beyond those already identified that are required to implement the change, for example supervision or verification;

(e) inclusion of how matters such as human factors and environment have been integrated into the planning and design process;

(f) details of any SMS documents that require review;

(g) the identification of resources required for monitoring and reviewing the change following the implementation;

(h) an exploration of barriers to effective change and ways to overcome these barriers (examples of barriers could include employee/stakeholder resistance, bureaucratic inertia, and the environment);

(i) an explanation of how assurance and governance is being managed; and

(j) the requirements to appoint an independent validator for the review of relevant SMS documents where the impact has been determined as significant.

Commentary *C3.5*

Higher impact changes require greater management and assurance. For a complex change that involves multiple stakeholders, a consultation plan could be useful to ensure sufficient consultation is undertaken and all risks are identified and managed as part of an implementation plan.

3.6 Approve the change

RTOs shall seek endorsements and approvals prior to implementing a change in accordance with the assessed level of impact and their organizational governance, risk management and authority delegation processes.

Relevant change management artefacts produced throughout the change lifecycle should be provided to support endorsement and approval.

RTOs shall retain records of endorsements and approvals in accordance with their organizational document management processes.

3.7 Implementing the change

The change can be implemented once the MoC plan has received the necessary approval.

After implementation, the progress of the MoC plan shall be monitored, and alterations made as required.

During implementation, those responsible for the plan should:

(a) report activity status including slippage and how activities were closed out;

(b) continually monitor and collate comments on the effectiveness of the implementation plan;

(c) document changes to ensure that the change process and any subsequent alterations are audited later if required;

(d) trouble-shoot emerging issues and put in place mitigating actions;

(e) capture issues and how they were resolved for the purposes of continuous improvement and learning;

(f) support the team involved in the change process; and

(g) continue to consult with stakeholders and identify any barriers to engagement.

Co-ordination may be necessary is required across the various business units involved in the process and all risks shall be managed SFAIRP.

3.8 Monitor and review the change

RTOs shall ensure the change, once implemented, is reviewed and assessed to determine whether or not the change has been appropriately managed.

The scope and nature of the post-implementation review should be commensurate with the scale of the change.

As part of the monitor and review process, RTOs should:

(a) undertake assurance activities to check the effectiveness of the change implementation, including risk mitigation;

(b) seek to identify and manage any new risks that eventuated;

(c) review any pre-existing risks that have been reduced or eliminated;

(d) identify additional risk controls implemented as part of the change;

(e) implement performance targets and organizational key safety performance targets set in the change process;

(f) monitor the effectiveness of any information, training, technology or changes to work practices for staff affected by the change;

(g) confirm that all RTO documents have been revised, including key organizational documents including policies, procedures, risk assessments;

(h) identify all issues encountered during the change process document and lessons learned in a way that supports continuous improvement and positively informs future change activities;

(i) document and action lessons learnt to support ongoing continuous improvement; and

(j) review stakeholder impacts and consultation with stakeholders.

Appendix A Hazard Register (Informative)

Hazard number	Hazard
2.1	Loss of accreditation
2.1.9	The failure to follow appropriate risk management processes
2.1.10	The failure to identify and document major hazards across operations
2.1.23	The lack of effective change control systems
2.1.24	The failure to implement effective change management systems

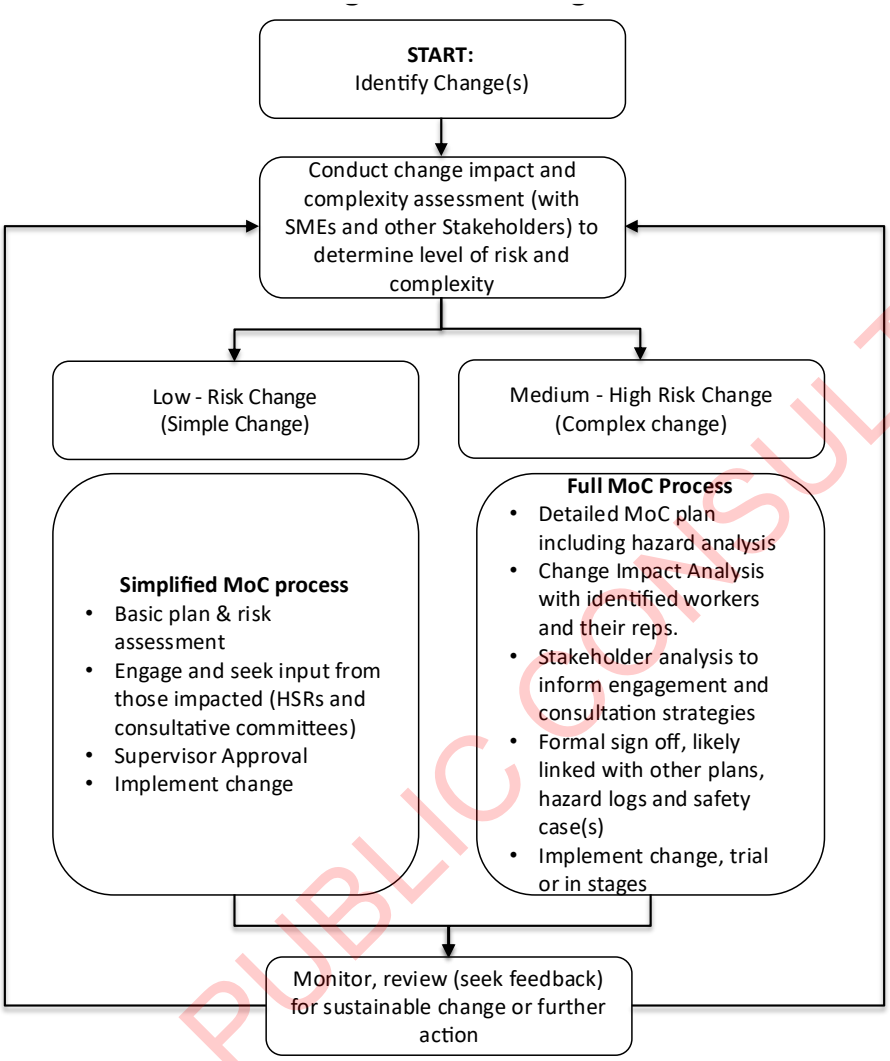
Appendix B Sample Change Impact Table (Informative)

Change scaling	Level of Complexity	Systems impacts	People Impacts	Process impacts
Low	Manageable with existing skills and resources using standard practices and procedures. Change can be managed by existing business and change management processes. No new or novel design elements.	Minor design work could be required and/or there are some elements of new technology but no change to fit, form or function. HMI changes are consistent with current system. Isolated systems limited impact	Minimal to minor impact to people including end users and customers. No or minimal change to user experience, ways of working or to tasks and activities. No or limited new skills or knowledge required, information can be communicated rather than trained, current skills are transferable.	No or minor change to operating practices during construction and delivery or post change. No impact to operations or maintenance performance. No new process requirements or change to existing practice.
Medium	Stretches ordinary capabilities, but manageable with existing resources. Design and development utilising available standards and processes, or with only minor modification to/variation from standards due to limited novel elements being introduced. Involves internal and external stakeholders and impacts that could extend across more than one part of the business.	Moderate change to systems or equipment and/or the introduction of new technology that extends on existing systems. Limited or minor novel design elements but risk is manageable with existing controls.	Moderate change to roles, tasks or technology requiring minor modification to skills and knowledge, rail safety worker training requirements or competence moderately impacted. Change likely to result in minor impacts to resourcing, rostering, or workload; that could require redeployment of internal resources or external support. Moderate temporary or permanent change to user experience for the customer or staff.	Change results in a temporary or permanent change to an operational practice. Moderate impact to service provision. Temporary or permanent impacts to maintenance tasks or access that are manageable within existing processes or only moderate updates to work plans. Construction activities introduce known risks, or new risks that are manageable under existing controls

High	Exceeds the ordinary capabilities with a high degree of uncertainty. Change is novel requiring specialized external expertise on complex interfaces. Design introduces uncertainty due to lack of precedent on the network/within the operating context. Involves many stakeholders internal and external.	New technology or system and/or introduction of novel or innovative design. Design and development require new standards and processes. Integration of new and/or novel systems with existing legacy safety critical systems.	Novel change requiring new skills and knowledge across multiple business areas. Significant impacts to tasks, conditions, work practices and work environments. Impact to multiple teams within a business unit, or across multiple divisions of the RTO business.	Construction has major impacts on operations or maintenance activities that are not covered by existing process or work plans. Construction methods are unconventional and/or introduce new risks not addressed by existing controls. Multiple changes to operating practices during construction/ delivery or post change. Significant service disruption.

This change impact table is for information purposes only and provides an example of how to implement a scaled approach to management of change. It is to be contextualized to suit each RTO's operations such as passenger, freight, light rail and infrastructure management. Risk associated with change activities will inform the level of complexity and the subsequent level of governance and assurance required for a change event. This includes changes to existing risk profiles for systems, people and/or process (e.g. the introduction of new risks, changes to the likelihood, frequency or severity of a risk, changes to consequence or the requirement for new controls or mitigations). Changes associated with interoperability, for example, will likely have additional cumulative impacts across systems, people and process.

Appendix C Change Scalability Flowchart (Informative)



Appendix Figure C-1 Scalable management of change framework

Bibliography (Informative)

- TBD