



Rethinking safety through  
**INCLUSION**  
+  
**WELLBEING**

**RAIL**

**ELEMENT 11**

10/04/2026

## MANAGEMENT OF CHANGE (MOC)

### PURPOSE AND SCOPE

The purpose of this system requirement is to describe the process required to manage any change that may affect the rail operations of LORAC as an accredited Rail Transport Operator (RTO), as a Rail Infrastructure Manager (RIM) and Rolling Stock Operator (RSO), in accordance with its obligation under the Rail Safety National Law (RSNL) and Rail Safety National Law National Regulations (RSNLNR)

This procedure is intended to ensure:

- Impacted stakeholders are identified and consulted, roles and responsibilities are clearly defined, and affected employees are trained to understand and deal with the Change.
- Changes and their associated risks are managed so far as is reasonably practicable (SFAIRP)
- Residual risks are communicated to the wider business for acceptance (business as usual).

### 1.0 DEFINITIONS

| TERM                                              | DEFINITION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>MANAGER / CHANGE OWNER OR CHANGE INITIATOR</b> | Manager responsible for workgroup affected by change.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>MANAGEMENT OF CHANGE CONTROL FORM</b>          | A form that describes and contains the details of the change to be made and includes sufficient documentation for the change to be assessed and approved.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>MANAGEMENT OF CHANGE REGISTER</b>              | A register that summarises and records the decisions and changes from the Management of Change Control Forms.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>MAJOR CHANGE</b>                               | <p>A Major change is any change that alters the level of safety risk (likelihood or consequence or product of both) towards people, rail infrastructure, accreditation or rolling stock. E.g. a different make of tyre with narrower/wider tyre that would change traction, braking and stability.</p> <p>This judgement includes the following prompts to determine whether the change is major or minor:</p> <ul style="list-style-type: none"><li>• Does the change impact the scope and nature of the accreditation held?</li><li>• Is the proposed change reportable to ONRSR?</li><li>• What is the impact/risk of the change?</li><li>• What are the impacts/risks if the change is not introduced correctly?</li><li>• Does the Change affect any railway operations being conducted on the NNI and require the preparation of an IMP?</li></ul> |
| <b>MINOR CHANGE</b>                               | A Minor change is that it does not change or alter the level of safety risk (likelihood or consequence or product of both) towards people, rail infrastructure, accreditation or rolling stock to any notable or practical degree. E.g. Different make of tyre that does not alter the handling or braking characteristics, non-critical bolts or like-for-like replacements, light bulbs.                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>CONTROL MEASURE</b>                            | The action taken to mitigate or reduce the cause of a risk event or adverse impact.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>HAZARD</b>                                     | A source or situation with a potential for harm to the environment, human injury or ill-health, damage to property, or combination of these.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

| TERM                                               | DEFINITION                                                                                                                                                                                                                                                                                                                                       |
|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>MANAGEMENT OF CHANGE (MOC)</b>                  | Process of predicting, assessing and managing the impacts of any type of change on an organisation and to the overall safety of its activities, products and services.                                                                                                                                                                           |
| <b>RAIL SAFETY WORKER</b>                          | A person who has carried out, is carrying out, or about to carry out rail safety work.                                                                                                                                                                                                                                                           |
| <b>RISK</b>                                        | An event occurring that shall have an impact on objectives. It is measured in terms of consequences and likelihood.                                                                                                                                                                                                                              |
| <b>RISK ASSESSMENT</b>                             | The overall process of estimating the magnitude of risk and deciding whether the risk is tolerable.                                                                                                                                                                                                                                              |
| <b>RISK CONTROL</b>                                | The part of risk management which involves the implementation of policies, standards, procedures and physical changes to eliminate or minimise adverse risks.                                                                                                                                                                                    |
| <b>RISK REGISTER</b>                               | A document that records and maintains risk information including assessments and controls.                                                                                                                                                                                                                                                       |
| <b>SFAIRP</b>                                      | So far as is Reasonably Practicable.                                                                                                                                                                                                                                                                                                             |
| <b>SMS</b>                                         | Safety Management System (SMS).                                                                                                                                                                                                                                                                                                                  |
| <b>STAKEHOLDERS</b>                                | Those people and organisations that may affect, or be affected by, a decision or activity. Stakeholders may include, but are not limited to, employees, Network Operators, interface organisations, unions, manufacturers and suppliers or other interested parties.                                                                             |
| <b>NATIONAL NETWORK FOR INTEROPERABILITY (NNI)</b> | Rail networks specified as the National Network for Interoperability by map or by description (or both).<br>The NNI includes major freight and passenger railways linking Australia's ports, passenger terminals, and regional centres of national importance.<br>Refer to ONRSR Guideline – Interoperability of Railway Operation – Appendix A. |
| <b>INTEROPERABILITY MANAGEMENT PLAN (IMP)</b>      | A document that sets out any interoperability matters identified and includes systems and procedures to ensure these interoperability matters are taken into consideration before changes are made to an RTOs' railway operations.                                                                                                               |

## 2.0 RESPONSIBILITIES

### 2.1 RAIL SAFETY COMMITTEE

The Rail Safety Committee shall provide governance, leadership, and guidance to ensure the necessary resources are provided for the effective operation of Management of Change (MoC) and that adequate systems are developed, implemented, and reviewed.

### 2.2 RAIL SAFETY & COMPLIANCE MANAGER

The Rail Safety & Compliance Manager shall ensure that the following elements have been satisfied according to SMS procedures:

- Once a change has been identified, plans for Management of Change (MoC) shall be developed in consultation with stakeholders
- Risk assessments are conducted, and the risks identified through this process shall be reviewed for allocation of appropriate control measures with the support of skilled, knowledgeable, and experienced employees
- Once a change has received the necessary approval, the change shall be implemented, monitored, and reviewed in consultation with key stakeholders
- Resources and training are provided if required (e.g. Manager / Change Owner)
- The management of change process is followed and effectively implemented
- Applications for variation of accreditation, new accreditation or other accreditation reports are lodged within the timeframe and format required by the ONRSR.



Where any Change that may affect railway operations conducted on the NNI is identified and were necessary, that an IMP is produced.

### 2.3 MANAGER/CHANGE OWNER

The Manager/Change Owner is the person proposing the change or given responsibility for facilitation of the proposed change.

It shall be the responsibility of the Manager / Change Owner to provide support to the Rail Safety & Compliance Manager and facilitate the implementation of this procedure within their project or workgroup.

The Manager/Change Owner shall also undertake within their project or workgroup to complete the following duties:

- Identify second order change, i.e. minor or major change
- Develop plans for management of change in consultation with stakeholders and according the SMS procedures, once a change has been identified
- Ensure a risk assessment(s) is conducted to identify the risks and allocate appropriate control measures in consultation with skilled, knowledgeable, and experienced employees
- Implement the change once it has received the necessary approval
- Monitor and review the change in consultation with key stakeholders
- Incorporate the change into the LORAC Safety Management System (SMS)
- Provide the resources and training required, where necessary, to implement the change, and provided if required.

### 2.4 PROJECT MANAGERS

Project Managers are responsible for ensuring all contractors abide by the contract requirements and have effective management of change processes in place.

### 2.5 RAIL SAFETY WORKERS AND OTHER ROLLING STOCK OPERATOR EMPLOYEES

All Rail Safety Workers and other rolling stock operator employees shall be responsible for complying with this procedure.

## 3.0 PROCESS DESCRIPTION

The key elements in the LORAC management of change procedure are:

- Identify the need for change and establish the context
- Utilise risk management
- Establish the change goals
- Document the change
- Review the Rail SMS
- Manage the implementation
- Sustain the change

Change management procedures at LORAC involve people who have the appropriate qualifications, knowledge and skills in the areas affected by the proposed change.



## 4.0 IDENTIFICATION OF CHANGE

The Management of Change (MoC) procedure is utilised when a project manager or change initiator considers that a change from the original will occur, is occurring or has occurred. Certain triggers can assist LORAC employees in deciding if the MoC procedure is required.

The management of change in the rail safety environment applies to changes of any nature that can alter rolling stock, which include but are not limited to:

- Rail infrastructure or rolling stock
- Equipment designs, operating parameters, and control systems including changing original equipment and design purpose or operating envelope
- Operating and maintenance procedures, processes, and systems
- Safety and environmental controls
- Materials or equipment components
- Changes in organisational structure, personnel responsibility and authority
- Considerations for the acquisition or divestment of assets
- Other procedures/processes and/or systems changes.

## 5.0 SCOPE AND NATURE OF CHANGE

First the Manager / Change Owner must recognise the nature, scope and need for the change and this is recorded in Section 1 of the Management of Change Control Form.

Changes that affect the safety of LORAC rail operations may arise from a number of areas, such as:

- Modifications to rail infrastructure and/or rolling stock
- Changes to procedures, processes, and systems
- Changes to organisational structure and position roles and responsibilities, including job design
- The general operating environment and interfaces

The Manager/Change Owner who has recognised the need for change must complete the Management of Change Control Form, which must be copied to the Rail Safety & Compliance Manager and to other affected departments/functions as appropriate, per Section 1 of the form. The form is then circulated to the relevant stakeholders for approval with the conditions detailed in Section 2.

## 6.0 TWO-WAY CONSULTATION WITH STAKEHOLDERS

An essential part of the Management of Change procedure, meaningful consultation with stakeholders requires regular dialogue between the parties to ensure that:

All information is collated concerning the change.

All stakeholders (internal, external, and interfacing) are aware of the change and are given the opportunity for meaningful two-way communication, especially about safety aspects.

Stakeholders' opinions are recorded and fully considered in the process.



## 7.0 RISK MANAGEMENT

### 7.1 RISK ASSESSMENT

Any proposed change that may affect safe operations requires the following steps. Risk assessment shall be undertaken in accordance with E14 'RISK MANAGEMENT FOR RAILWAY OPERATIONS' and where necessary Project Risk Management, including:

- Identify suitable controls.
- Consult with affected stakeholders, including the relevant rail safety workers.
- Check the proposed change complies with relevant legislation.
- Apply accepted codes or practice and/or standards, where appropriate.
- Incorporate the change into the SMS and review.
- Document and implement the change.
- Sustain the change.

### 7.2 IDENTIFICATION OF RAIL SAFETY RISKS

In communication with key people affected by the proposed change, the Manager / Change Owner or Rail Safety & Compliance Manager shall identify the rail safety risks by employing risk management procedures that:

- Identify events that could cause harm and the nature of possible outcomes from those events.
- Employ methods of assessing risk either quantitatively or qualitatively by determining the likelihood and consequences of events associated with the identified failure mode of the safety system or process.
- Rate the risk.
- Determine risk controls and risk treatments to reduce the risk SFAIRP where appropriate, including reasons for selecting certain control measures and rejecting others.
- Analyse and monitor occurrences to identify problem areas and adverse trends.
- Seek independent validation where appropriate.

### 7.3 IDENTIFYING THE SOURCES OF RAIL SAFETY RISKS

Key sources of rail safety risks to be considered are:

- Risks associated with contractors, visitors and other personnel who are granted access to railway property.
- Security risks (trespass, vandalism, terrorism, criminal acts, dangerous goods, violence to rail safety workers).
- Change management risks.
- Human factors risks.
- Emergency and crisis response management.
- Asset management and procurement.
- Communications.
- Fire prevention and control.
- Interfaces.
- Safety and security.

## 8.0 TOOLS FOR HAZARD AND RISK ASSESSMENT

The SFAIRP risk assessment template is the primary tool used for Hazard and Risk Assessment associated with management of change.

Where a change has high levels of complexity, the Change Owner / Change assessment stakeholders may supplement the SFAIRP risk assessment template using one of the methodologies detailed in the RISSB 'Systems Safety Assurance Guideline (table 2), which is summarised below provides the following guidance:

|                | Known Consequences           | Unknown Consequences                 |
|----------------|------------------------------|--------------------------------------|
| Known Causes   | Verification<br>FME(C)A, ETA | Consequence Analysis<br>FME(C)A, ETA |
| Unknown Causes | Causal Analysis<br>FTA       | Exploratory Analysis<br>HAZops       |

Per the above table:

- Exploratory approaches, like HAZOP (Hazard and Operability Study), are ideal when there are unknown causes and consequences resulting from the proposed change.
- For known causes and known consequences, FMEA (Failure Mode and Effects Analysis) and ETA (Event Tree Analysis) are ideal given the existing hazard analyses.
- For known consequences but unknown causes, FTA (Fault Tree Analysis) is more ideal in this situation.
- For unknown consequences but known causes, focus on the component failures via FMEA or ETA are ideal.

## 9.0 ESTABLISH THE CHANGE GOALS

To determine the goals of the change, the following elements are identified:

- Purpose of the change
  - Who proposed the change and what evidence is there for change?
  - What is the desired end result?
  - What would happen if nothing was done?
- Organisational boundaries and timeframes
  - How soon must the change be implemented?
  - What are the risks if change is not implemented in this time?
  - What exactly will be changed?
  - What is the nature and degree of change?

## 10.0 IMPACT OF THE CHANGE

The Manager / Change Owner must determine the impact of the change in consultation with stakeholders.

Once the purpose, timing and impact are identified, the goals of the change must be discussed. These goals must be clear, concise and easy to understand as are to be articulated to all members of the change process.



## 11.0 EVALUATE CHANGE LEVEL, SET GOALS, DEFINE READINESS & DEVELOP IMPLEMENTATION ACTION PLAN

At this stage information is gathered, evaluated, consolidated, and further consultation with stakeholders is undertaken. The change and associated activities are determined and plans for implementation are developed.

The Project Manager or Change Initiator should ask questions such as the following:

- How well are rail safety workers and stakeholders prepared for and willing to carry out the planned changes?
- Are there barriers to effective change? If so, detail them and develop strategies to overcome them.

Second-order change is more likely to be resisted than first-order change, so it is important for the Manager or Change Initiator to identify underlying reasons for resistance, then treat the cause rather than the symptoms. They should undertake adequate communication with stakeholders, so the relevant stakeholders understand the purpose of the change and any of their concerns are allayed.

For change that involves a large impact, the change manager should consider conducting individual interviews with representative stakeholders to gauge their perspectives, levels of resistance and support.

With the change level evaluated and the culture around the change assessed, an Implementation Action Plan needs to be developed and established which includes details such as:

- How has the change been planned for?
- Modifications or possible changes to the SMS
- Communication about important changes to operations, equipment and procedures is disseminated
- Requirements for instruction and training
- Any additional resources required to implement the change, for example accreditation or verification
- Documents that need to be revised, for example operating procedures, risk registers, training material, interface coordination plans, emergency and MoC documentation itself
- Plans for monitoring and reviewing the change following implementation.

The Implementation Action Plan must be approved by the Rail Safety Committee before it can be disseminated to internal and/or external stakeholders.

## 12.0 DOCUMENT THE CHANGE

After the Implementation Action Plan is approved, it must be put into action. Actions are to be logged on the Teams MOC tracking register.

Documentation to support the plan (external reports, quotes, findings, memos) and the change are considered by the Rail Safety Committee for endorsement. The committee also assesses whether an independent review or safety validation needs to be undertaken. If changes are required to the rail SMS, then these changes will be approved by the GM H&S.

## 13.0 REVIEW OF THE SMS

As change is often unpredictable, Project Managers and the Manager/Change Owner must be flexible and prepared to improvise.

The Manager/Change Owner must be prepared to undertake the following tasks during transition:

- Implement strategies and interventions as outlined in the Implementation Action Plan, under the supervision of the relevant manager



- Collect feedback and monitor transition continuously
- Document changes and establish a change archive to create an audit trail.

The Manager / Change Owner must work closely with the relevant Project Managers to:

- Trouble-shoot emerging problems;
- Decide if and when to enact contingency plans, or amend change plans
- Coordinate between different areas of the organisation
- Provide support
- Deal with resistance to the change.

## 14.0 MANAGE THE IMPLEMENTATION

To track changes from origination through to completion, it is vital to document the information gathered.

The MoC process must ensure that:

- The introduced change has been accepted across the whole organisation
- The introduced change has achieved its goals.

The Implementation Action Plan may need to be amended as the change transition rolls out because change is dynamic and can continue throughout the change lifecycle.

For this reason, Project Managers and Manager / Change Owners must monitor the Implementation Action Plan, making alterations as needed and keeping the relevant stakeholders informed of the changes.

Project Managers and Manager / Change Owners are required to:

- Monitor and collate comments on the effectiveness of the implementation strategy
- Document changes to ensure that the change process and any subsequent alterations can later be audited, if required
- Trouble-shoot emerging issues and put in place mitigating actions to reduce disruption
- Support the team involved in the change process
- Manage resistance and encourage support
- Coordinate with the various stakeholders involved in the process.

## 15.0 INTRODUCTION OF NEW RAIL PLANT

To assist with the collection of data and records required to implement the introduction of new rail plant the following checklist is to be used per E16A: Rolling Stock Equipment Procurement Checklist.

The purpose of this document is to:

- Compliment the Management of Change processes and procedure and capture sufficient evidential documentation, to demonstrate compliance with LORAC Rail SMS.
- To enable the progress to be tracked of those nominated to manage the activities.

Copies of all documentation collated are to be kept by the Rail Safety & Compliance Manager.

## 16.0 SUSTAIN THE CHANGE

The Management of Change process includes all of the activities to be completed within the implementation and embedding of the change.

To ensure this, the Manager / Change Owner in collaboration with Project Managers must ensure that:

- Changes that are introduced are meeting long-term goals.



- All change goals have been met.

Sometimes change can appear to have been applied but upon closer inspection, it has not been fully accepted and/or adopted. To prevent this, LORAC regularly reviews and monitors activities to ensure the new processes are being applied rigorously.

## 17.0 VALIDATION OF RAIL SAFETY

### 17.1 VALIDATION OF SAFETY

Prior to the implementation or approval of any proposed change LORAC shall prepare a validation of safety for changes that affect safety related activities, which may include:

- Driving/operating rolling stock.
- Control of rolling stock.
- Track and civil infrastructure.
- Rolling stock activities.
- Signalling, operational systems and telecommunication infrastructure.
- Electric traction infrastructure.
- Interface with engineering and operating systems, equipment and infrastructure including roads.
- Rail worker safety.
- Safe working systems and procedures.

### 17.2 LIFE CYCLE OF CHANGE

Validation of rail safety must cover each stage of the life-cycle of the change such as:

- Concept.
- Design.
- Construction.
- Implementation.
- Commissioning.
- Operation.
- Monitoring.
- Maintenance.
- Modification.
- Decommissioning.
- Destruction/disposal.

### 17.3 APPROVAL/SIGN OFF

Validation of rail safety must be undertaken by personnel with the skills, knowledge and experience in the area affected by the proposed change.

The Rail Safety & Compliance Manager in cooperation with the Project Manager/Change Initiator shall identify the relevant personnel to take part in the risk assessment, which may include:

- Stakeholders.
- Rail Safety Workers.
- HS representatives.



- HC representatives.
- Design and construction engineers.
- Any other persons deemed relevant to the safety of the operation.

## 18.0 NOTIFICATION AND AUTHORISATION

### 18.1 NOTIFICATION TO ONRSR

Where required by legislation, an application for variation to accreditation must be prepared and lodged with ONRSR.

Applying for a variation of accreditation is the responsibility of the Rail Safety & Compliance Manager.

Other notification, reports or information may need to be provided to the ONRSR prior to or at the time of the proposed change and such information shall be provided by the Rail Safety & Compliance Manager.

Changes that must be notified are a minimum:

1. A decision to design or construct, or to commission the design or construction of, rolling stock or new railway tracks.
2. The introduction into service of rolling stock of a type not previously operated by the operator or the re-introduction into service of rolling stock not currently operated by the operator.
3. A change to a safety critical element of existing rolling stock.
4. A change to 1 or more of the classes of rail infrastructure used in the operator's railway operations.
5. A change to a safety standard for the design of rail infrastructure or rolling stock.
6. The decision to adopt a new safety standard for the design of rail infrastructure or rolling stock.
7. A change to the frequency of, or procedures for, the inspection or maintenance of railway infrastructure or rolling stock.
8. A change to the network rules relating to the conduct of the operator's railway operations.
9. A decision to introduce a new network rule relating to the conduct of the operator's railway operations.
10. A decision to change any work scheduling practices and procedures set out in the operator's fatigue risk management program.
11. The replacement or a change in the contact details of any person appointed under regulation 8(b) (i.e. The Rail Safety & Compliance Manager).
12. A change in the operator's name or residential address, or the operator's business or trading name, or in the case of a body corporate, a change in the name or registered business address of the body corporate.

## 19.0 AUTHORITY TO INITIATE CRITICAL CHANGE

### 19.1 REASONS FOR CRITICAL CHANGE

LORAC aims to ensure that where changes are planned, any immediate safety risks associated with the change are identified and controlled. In the event of an immediate risk to health, safety or environment, a responsible manager must implement risk control measures without delay.

The Change approval processes detailed here must be adhered to as soon as practicable following immediate action.

Prior to the implementation of Critical Changes, formal approval must be obtained



Critical Change requests may only be lodged by the Manager/Change Owner of the department/function initiating the change – this person is considered the “Change Initiator”.

The relevant Manager/Change Owner or Project Manager must review the proposed change and detail necessary safety prerequisites, including:

- Risk Register update to reflect the proposed change.
- Risk assessments to reflect the proposed change.
- Specific training needs.
- Consultation with Health & Safety Representatives and/or WHS Committee.
- Development or review of procedures.
- Engineering certification for proposed design changes.
- Updates to relevant registers (e.g. risk, plant, contractor registers).

Critical Changes shall not be implemented until all specified WHS&E requirements are met.

### 19.2 CHANGE APPROVAL DISPUTES

In the event a compromise is unable to be reached between the Manager / Change Owner or Change Initiator and the Project Manager of an affected area, the matter must be referred to the Rail Safety Committee for resolution.

Any employee wishing to dispute a critical change may do so through the Rail Safety Committee.

### 20.0 FORMS AND TEMPLATES

- Management of Change (MoC) Control Form
- Risk Assessment SFAIRP
- Management of Change (MoC) Register
- Management of Change (MoC) Implementation Action Plan

### 21.0 STANDARDS

- AS-7472 2018 Railway operations management of change