

Dear Mr Carey

**Office of Rail Regulation Consultation. Revising Railway Safety Regulations  
Railway Safety (Miscellaneous Provisions) Regulations 1997, Railway Safety Regulations 1999 and  
Railway Safety (Miscellaneous Amendments) Regulations 2001.**

Thank you for notifying Unite of this consultation.

Unite is the largest trade union for Britain and Ireland with 1.5 million members. We represent workers in all areas of industry including food retail and distribution, hotel and casino workers, road, rail, air and sea transport, manufacturing, local authorities, the health service, civil service, community workers and not for profit sector, print and media, finance and legal and utilities. We have a number of members working in the railway industry including as train drivers, rail track maintenance staff, rail catering staff and in train manufacturing.

We note that ORR has conducted earlier (recent) reviews of railway safety legislation and concluded that no changes were necessary.

Unite is therefore very concerned that the regulator for a safety critical industry is talking in terms of “red tape”, “burden on business” and “deregulation” as an excuse to weaken regulation, especially when it is acknowledged that there is still a great deal to be done to protect the safety and health of workers in the industry.

We are opposed to any changes and in particular do not consider it appropriate to move from specific duties to a reliance on general health and safety duties.

Yours sincerely

**Tony Murphy**  
**Unite National Officer for Rail**