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12 February 2018



Mr Andrew Hall
Deputy Chief Inspector of Rail Accidents
Cullen House
Berkshire Copse Rd
Aldershot
Hampshire GU11 2HP

Dear Andrew,

Collision at Plymouth station, 3 April 2016

I write to report¹ on the consideration given and action taken in respect of the three recommendations addressed to ORR in the above report, published on 13 February 2017.

The annex to this letter provides details in respect of each recommendation. The status of recommendations 1 and 2 is '**implemented**' and the status of recommendation 3 is '**implementation on-going**'.

ORR will advise RAIB when further information is available regarding actions being taken to address this recommendation.

We will publish this response on the ORR website on 19 February 2018.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Oliver Stewart', with a stylized, flowing script.

Oliver Stewart

¹ In accordance with Regulation 12(2)(b) of the Railways (Accident Investigation and Reporting) Regulations 2005

Initial consideration by ORR

1. All 3 recommendations were addressed to ORR when the report was published on 13 February 2017.
2. After considering the recommendations ORR passed Recommendations 1 & 3 to Great Western Railway and recommendation 2 to Network Rail asking them to consider and where appropriate act upon them and advise ORR of its conclusions. The consideration given to each recommendation is included below.
3. ORR also brought the recommendations and learning points in the report to the attention of all other TOCs as it was concluded that that there are equally important lessons for them. ORR did not ask these organisations to provide a formal reply.
4. This annex identifies the correspondence with end implementers on which ORR's decision has been based.

Recommendation 1

The intent of this recommendation is to reduce the risk of drivers misunderstanding the concept and application of permissive working.

Great Western Railway should review its driver training and assessment processes that relate to permissive working with the overall objective of ensuring that new drivers have the knowledge and skills that are needed to address the hazards they may encounter when entering an occupied platform. The review should include consideration of how best to:

- discourage drivers from making any assumptions about the length of platform that is clear, and to avoid presuming that the line is clear to a car stop sign; and
- provide practical experience in a variety of permissive platform working situations, for example, at through platforms, into bay platforms, in track circuit block areas and under absolute block arrangements.

Great Western Railway should implement any enhancements to its existing training and assessment processes that have been identified.

ORR decision

5. GWR have reviewed their driver training and assessment provision with regard permissive working. The actions GWR has taken were partly in response to an Improvement Notice issued by ORR. We are encouraged that GWR are sharing the learning in the report with other TOCs through the RDG Operations Standards Forum.

6. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, GWR has:

- taken the recommendation into consideration; and
- taken appropriate action to implement it

Status: Implemented.

Information in support of ORR decision

7. On 9 August 2017 provided the following initial response:

'Immediately following the incident, we undertook face to face briefings with all the drivers that signed Plymouth station on a range of additional control measures and raising their awareness of the specific risks of Plymouth. Furthermore, the wider lessons learnt have been briefed to all GWR drivers and followed up on subsequent practical and unobtrusive assessments. These have included a change to driving style when approaching a platform under permissive working and not more than 10mph from the start of the platform ramp.

The Head of Operations also sought the views of the operations professions via the Rail Delivery Group Operations Standards Forum to gain examples of industry good practice regarding trainee driver training specifically associated with permissive working. GWR subsequently commissioned a leading expert in operational risk to work with the Operations Standards Team and the Driver training team to enhance the training material.

This material was completed in March 2017 and included within the current driver training. The material included enhanced understanding of permissive working in a range of scenarios with specific reference to the Plymouth incident, learning exercises for trainees, trainer session plans and trainee knowledge tests.

The material has also been shared with the members of the RDG Operations Standards Forum to show duty of cooperation.'

Recommendation 2

The intent of this recommendation is for Network Rail and train operating companies to better understand and manage the local operational risks that can affect permissive working train movements.

Network Rail, with the assistance of the relevant train operating companies, should review and, where necessary, enhance the following aspects of operating arrangements at stations where permissive working for passenger and ECS trains is authorised:

- the means by which signallers should establish the combinations of trains which can be safely accommodated at platforms (to include considering provision of simple look-up tables, whether particular processes should be mandated, and the safe useable length of platforms);
- defining any particular circumstances in which the signaller should speak to the driver in order to provide details of an intended movement into an occupied platform; and
- speed restrictions applicable to trains entering platforms during permissive working

ORR decision

8. Network Rail have developed a new risk assessment template in collaboration with passenger train operators for stations where permissive working for passenger and ECS trains is authorised, and have introduced it to the routes. Permissive working risk assessments using the new format have been completed and the outcomes shared with the train operators.

9. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Network Rail has:

- taken the recommendation into consideration; and
- has taken appropriate action to implement it

Status: Implemented.

Information in support of ORR decision

10. On 2 August 2017 provided the following initial response:

'Network Rail has undertaken a review of the operating arrangements at stations where permissive working for passenger and ECS trains is authorised. The review included the development of a new risk assessment spread sheet which was produced with GWR, the Western Route, Operations Safety Team and the Head of Operations Team. The new risk assessment template includes the key learning points from the Plymouth incident and the need for industry collaboration. The review for each location was completed by the Route team in conjunction with the other parties as indicated in NR/L2/OPS/085 Issue 5 dated 3 June 2017 Sections 4 and 7.

When considering the means by which signallers should establish the combinations of trains which can be safely accommodated at platforms, the review determined that the recent changes to NR/L2/OPS/085 Issue 5 dated 3 June 2017 (section 5 and section 6 of the document) covered this requirement for new and existing schemes.

In considering whether defining any particular circumstances in which the signaller should speak to the driver in order to provide details of an intended movement into an occupied platform, it was determined that it is not possible to define the types of moves where a signaller is required to contact the driver. The rule book is clear when the Signaller should advise the Drivers when they are entering an occupied platform and therefore this is not applicable.

In considering speed restrictions applicable to trains entering platforms during permissive working, the review determined that the style of driving when making a permissive move is 'at caution'. This means the driver controls their train at a speed which allows them to stop short of any obstruction. The reference to 113c does not help due to there being no reference to speed restrictions as a causal factor. There is no requirement for the imposition of a speed restriction as this may still be too high and lull the driver into a false sense of security, the main thing is for the driver to make any move into an occupied platform at caution.'

11. On 5 February 2018, Network Rail confirmed that all Routes had completed their permissive working risk assessments using the new format and had shared the outcomes with the train operators.

Recommendation 3

The intent of this recommendation is to reduce the risk of injury when operating emergency door release handles.

Great Western Railway should modify the emergency door release arrangements on class 150 trains so that passengers are not put at risk of injury when using them. It should also review emergency door release arrangements on other trains it operates to determine whether, and when, a similar modification is required.

ORR decision

12. Great Western Railway has reviewed the glass used on emergency door releases on Class 150 and 153 fleets. GWR has concluded that new glass should be fitted and a plan is in place to carry out the necessary work.

13. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Great Western Railway has:

- taken the recommendation into consideration; and
- is taking action to implement it

Status: Implementation ongoing. ORR will advise RAIB when actions to address this recommendation have been completed.

Information in support of ORR decision

14. On 9 August 2017 Great Western Railway provided the following initial response:

'Great Western Railway should modify the emergency door release arrangements on class 150 trains so that passengers are not put at risk of injury when using them. It should also review emergency door release arrangements on other trains it operates to determine whether, and when, a similar modification is required.

GWR have reviewed the design of the fleets emergency glass and have identified a common issue on the 150 and 153 fleets. The frequency with which the arrangement is disturbed is low.

For the 153 fleet replacement materials are already on depot and these will be changed out during planned exams. This will be completed by the end of December 2017.

For the 150 fleet the replacement material is on order and once received by depots will be changed out during planned exams. This will be completed by the end of March 2018'