

Oliver Stewart
RAIB Recommendation Handling Manager



12 February 2026

Mr Andy Lewis
Deputy Chief Inspector of Rail Accidents

Dear Andy,

RAIB Report: Derailment of a passenger train at Carmont, Aberdeenshire on 12 August 2020

I write to provide an update¹ on the action taken in respect of recommendations 2 & 19 addressed to ORR in the above report, published on 10 March 2022.

The annex to this letter provides details of actions taken in response to the recommendations and the status decided by ORR. The status of recommendations 2 & 19 is **'Closed'**.

We do not propose to take any further action in respect of the recommendation, unless we become aware that any of the information provided has become inaccurate, in which case I will write to you again.

We will publish this response on the ORR website.

Yours sincerely,

Oliver Stewart

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

Recommendation 2

The intent of this recommendation is to identify and correct instances where new works have not been incorporated into appropriate maintenance processes (at present these include Ellipse and Maintenance Scheduled Tasks).

Network Rail should:

- a) take steps necessary to ensure that all elements of infrastructure constructed in Scotland since 2012 that require routine inspections and maintenance are included in the appropriate asset management processes
- b) dependent on findings from the above activity, extend the timeframe, to an extent determined on the basis of safety risk, to include work constructed before 2012
- c) determine, based on safety risk, the extent to which similar steps are required on Network Rail infrastructure outside Scotland and, if necessary, implement these steps
- d) conduct an audit review covering the implementation of existing arrangements to identify, report and correct asset database management and data quality issues

ORR decision

1. Network Rail has undertaken wide-ranging and detailed investigations and reviews to identify works within scope of the recommendation and successfully identified many thousands of relevant projects.
2. For all identified works and projects Network Rail has ensured that necessary information is now in the required asset information and management systems to facilitate appropriate inspection and maintenance of assets. This work has included identifying and rectifying omissions in health and safety information associated with new and altered works such as tracking down or generating missing health and safety files. The majority of the outstanding 'legacy' H&S Files are planned for closure in 2026.
3. As well as rectifying information outputs from projects, Network Rail has conducted validation of known assets against assets recorded in relevant asset management system to identify gaps and consider whether the inspection and maintenance regimes specified within the system are appropriate.
4. Despite this extensive work, the possibility of there being unknown and/or unrecorded assets cannot be fully ruled out. However, Network Rail believe that it has made all necessary reasonable efforts to identify relevant assets, and the likelihood of significant omission and associated risk is very low.
5. We paused closure of the recommendation as a Targeted Assurance Review found a significant proportion of H&S files for drainage schemes installed within earthworks sites were not available. Network Rail has now provided justification for those H&S files that were not available, so we consider the recommendation closed.

6. 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 action to close it.

Status: Closed.

Previously reported to RAIB

7. On 14 May 2025 ORR reported the following:

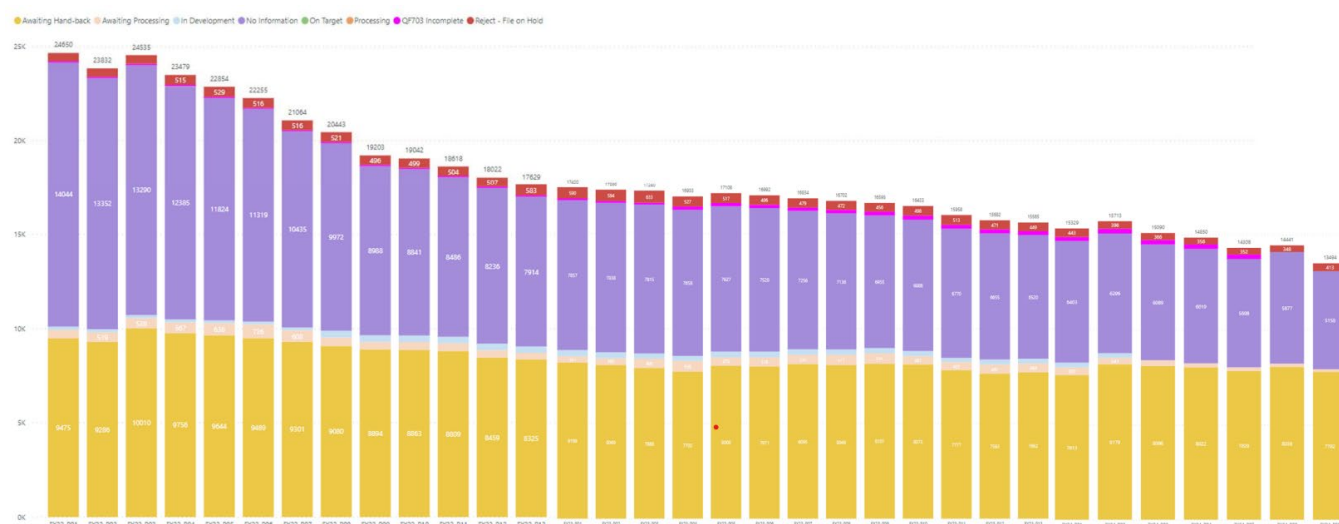
We were satisfied with the plans first described to us as Network Rail's means to identify and rectify any deficiencies of the type envisaged by the RAIB recommendation. At the end of April 2023, we received a closure statement from Network Rail. We discussed this with Network Rail and indicated that we needed to see substantial progress by each region before we would consider the recommendation to be closed. We have had a further update since then, showing good progress by most regions, but others requiring an extension to the originally agreed timeframe. Closure for the two remaining routes is 31 March 2025 for Scotland and 1 August 2025 for Eastern.

Network Rail has:

- Undertaken a national review (not confining it to Scotland initially, as suggested by the recommendation).
- Ensured national coordination of regional efforts through each region's Director of Engineering and Asset Management (DEAM).
- Initiated the review using a risk-based approach. A working group involving all regions and the Technical Authority (and overseen by Network Rail's National Records Group, for governance) drew up a plan identifying all relevant asset management systems and mapping all the processes relevant to ensure completeness and accuracy of asset information and planning of associated inspection and maintenance tasks.
- Questionnaires and interviews of front-line staff informed further development of action plan criteria. Each region adopted structured questions to draw up prioritised plans to:
 - Undertake identification of historic enhancement/renewal and refurbishment projects affecting assets
 - For each project, produce and provide a H&S file and AMP forms
 - Where H&S file could not be found, make strenuous further searches to track down the information (from alternative sources where possible)
 - Ensure all H&S files appropriately stored to allow future consultation/reference

- Check, so far as possible, for all projects, that asset data is provided, is complete, is accurate and has been input/transferred appropriately. Where this hasn't happened, use best endeavours to fill gaps and/or correct data.
- Update asset registers in asset management systems as required.
- Update inspection and maintenance tasks in asset management systems (generally MSTs – maintenance scheduled tasks – in Ellipse
- Undertake inspection and maintenance activities

The following chart is from Network Rail and shows the status of H&S files for projects, and identifies that those with missing or incomplete data is steadily reducing. The regions have nearly reached the point that is 'steady state' for H&S file and AMP form provision, as there will always be a lag between project completion and the provision of revised asset data. We have accepted that are some details from missing H&S files that will never be recovered. There is more work for regions to do to demonstrate consistently that they have made equivalent progress on the programming and achievement of MSTs, that is why a compliance extension has been requested.



With regard to item d) of the RAIB recommendation (audit of arrangements), a special topic audit has been carried out by the Technical Authority in four regions.

In addition to the work described to identify and correct instances where new works have not been incorporated into appropriate maintenance processes, Network Rail has made the following improvements to process to make it less likely that there will be repeats of the shortcomings found at Carmont (some linked to recommendation 1):

- The standard for CDM H&S files (NR/INF/02202) was updated in June 2023 to make requirements explicit
- The requirements of NR/INF/02202 are now incorporated into Contract Requirements documentation

- A new 16-week limit has been introduced for provision of entry into operational service
- Guidance for a range of Project staff including engineers and project managers now include objectives relating to H&S file provision
- The AMP (Asset Management Process) standard (NR/MTC/089) was updated in December 2023 to strengthen links to H&S File production

There is regular monitoring of the dashboard that has been established for missing H&S files and MSTs. This involves Route Services, Technical Authority and Network Rail regions. Network Rail's National Records Group has oversight of progress against the action plans.

Several regions have recently shared draft closure statements with us. Not all regions are so advanced in what they have completed. The latest date to finish all the planned work is August 2025. We therefore expect to be able to report all actions complete by the end of 2025.

Update

8. On 5 August 2025 Network Rail provided the following closure statement for the Scotland route:



[N242-11] Carmont
RAIB Rec 2 (Scotland).

9. On 2 September 2025 Network Rail provided the following closure statement for the Eastern route:



[N243-09] Carmont
RAIB Rec 2a (Eastern).

10. On 11 September 2025 Network Rail provided the following current position in the SHEP:



ELT National SHEP
Summary Report Peri

11. On 13 November 2025 Network Rail provided the following update:

As discussed, please see our responses to the questions on Carmont Rec 2 closure. Please let me know if you have any questions

- 1. Have all projects where assets have been constructed or amended since 2012 been closed out with confirmation that the H&S file has been submitted and/or that the assets are in use and being inspected and**

maintained, i.e. included in the appropriate asset management processes (including Ellipse and MST)?

The Regions have confirmed that the majority of 'legacy' (pre-CP6) schemes identified as potentially requiring a H&S File have been closed out with National Records Group (NRG), via the one of the following methods:

- 1. Submission of full Health & Safety files in line with the requirements of current standards.*
- 2. With full or partial H&S File documentation not strictly in line with current standards but acceptable to the asset owner to accept the file 'as is'.*
- 3. Using the 'Scotland approach' through obtaining agreement with the asset owner that the asset is in use and being inspected and maintained despite the lack of a H&S file.*
- 4. Closed as 'not required'.*

Over 12,000 projects H&S Files have been confirmed as closed as part of this exercise. Some Regions have adopted a risk-based approach to identifying the most critical assets and to confirm that these have been included in the relevant asset management systems.

H&S files for more recently constructed infrastructure, i.e. CP6 and later, and the use of AMP forms for handback of assets, are being submitted in line with current standards and are being tracked and managed through business-as-usual periodic reporting.

2. If this is not the case, what is the proportion of the projects which have not yet been closed out?

The proportion of 'legacy' projects which have not yet been closed out is as follows (as of October 2025): Eastern = 7%, NW&C = 24%, Scotland = 13%, Southern = 1% and W&W = 2%.

Regions are working to address the number of outstanding files, both legacy and CP6 onwards, as part of their governance, monitoring and assurance processes.

3. For projects which have not yet been closed out what is the timescale for doing so?

Efforts have been focused on minimising the risk of unmaintained assets following infrastructure changes. Key actions include:

- Reducing the number of overdue Health & Safety (H&S) files.*
- Investigating scheduling issues to ensure no assets are left unmaintained.*
- Filling historic asset data gaps based on collected intelligence.*
- Strengthening assurance processes, including embedding checks into business-as-usual (BAU) activities and monitoring through Level 2 Assurance KPIs.*
- Driving behavioural change to prevent future backlogs in H&S file closure and asset data provision.*

The majority of the outstanding 'legacy' H&S Files are planned for closure in 2026.

4. Do Regions have processes in place to identify, capture and rectify assets which are not being inspected and maintained in line with standards?

Yes, these are summarised as follows:

- *There have been revisions to the key standard for H&S Files and Asset Handback (NR/L2/INF/02202 and NR/L2/MTC/089) to strengthen H&S File and Asset Handback & Data processes.*
- *All Regions have processes to identify and rectify missing or incorrect asset data and MSTs (Maintenance Scheduled Tasks) as issues arise.*
- *Regional data teams work closely with Route System Support Managers (SSMs) to improve asset data quality and ensure compliance with standards.*
- *Periodic Level 2 Assurance Meetings review data shortfalls by asset type, record action plans, and track progress.*
- *Regional Asset Data Governance Panels meet regularly to review MST configuration and performance metrics (accuracy, relevance, timeliness).*
- *Periodic Assurance Reviews monitor compliance with H&S file returns. Any sustained drop triggers escalation to the Level 1 Business Assurance Committee.*
- *Data gaps are identified through Regional working groups comparing local data with nationally generated reports. For example:*
 - *Track Inspection Gap Reports highlight missing MSTs for critical inspections (visual, PLPR, ultrasonic).*
 - *Combined MST Integrity Reports identify non-conformance to maintenance business rules (under-maintained or missing MSTs).*
 - *Invalid/Missing Asset Hierarchy Reports address gaps in asset component structures, reducing MST issues.*
- *The MyWork App enables maintenance staff to add missing assets directly from site.*
- *The REVAMP App, which has been developed by W&W Region and some other Regions are looking to adopt, tracks project progress through the AMP process, ensuring nothing is missed.*
- *Ongoing assurance activities, such as Engineering Verification and Functional Audits, will be used to identify, and rectify, non-compliances.*

Recommendation 19

The intent of this recommendation is to evaluate the additional risk to train occupants associated with the continued operation of HSTs, which entered service before modern crashworthiness standards were introduced in July 1994. This will enable the future planning of HST deployment to be informed by a fuller understanding of any additional risk and the costs and safety benefits of any potential mitigation

measures. This learning should also inform thinking about the mitigation of similar risks associated with the operation of other types of main line rolling stock.

Operators of HSTs, in consultation with train owners, ORR, DfT, devolved nations' transport agencies and RSSB should do the following:

- a) Assess the additional risk to train occupants associated with the lack of certain modern crashworthiness features compared to trains compliant with Railway Group Standard GM/RT2100 issue 1 (July 1994), also taking account of age-related factors affecting condition (such as corrosion). This assessment should include a review of previous crashworthiness research (including driver safety), a review of previous accidents, consideration of future train accident risk, the findings presented in this report and any relevant engineering assessments.
- b) Based on the outcome of a) and cost benefit analysis, identify reasonably practicable measures to control any identified areas of additional risk for HSTs, and develop a risk-based methodology for determining whether, and if so when, HSTs should be modified, redeployed or withdrawn from service.
- c) In consultation with operators of other pre-1994 passenger rolling stock, develop and issue formalised industry guidance for assessing and mitigating the risk associated with the continued operation of HSTs and other types of main line passenger rolling stock designed before the introduction of modern crashworthiness standards in 1994.

ORR decision

12. The recommendation required cooperation between HST owners, operators, ORR, DfT (and devolved nation agencies) and RSSB and is in three parts, constituting an assessment of HSTs against modern standards for crashworthiness, the identification of any reasonable practical modifications based on that research and the capture of those findings in guidance.

13. An industry steering group lead by RSSB has coordinated the work associated with all of the Carmont RAIB recommendations concerning the performance of the train once it had derailed (recommendations 12, 14-20). ORR has been an observer on the steering group since it started and have been content with its work to date and note changes have been made where we have made suggestions.

14. As previously reported to RAIB, for Part a of the recommendations, the crashworthiness of HSTs was assessed against the Railway Group Standard GM/RT2100, issue 1, July 1994. Using the Finite Element model developed for HST as part of Rec 18a, and an extensive review of HST incidents, engineering assessments and the output of Rec 17, a report was produced which includes a full cost benefit analysis of options for HST enhancements using the same principles as that used in rec 15 and rec 17. This report is also the basis of the response to recommendation 3 contained in RAIB Report 13/2024: *Collision between a passenger train and a fallen tree at Broughty Ferry*.

15. The report found that the cost of all of the proposed engineering changes was likely to be grossly disproportionate to the safety benefit. The exception to this was lifeguards, identified by Carmont rec 14, which it was considered appropriate to upgrade without further assessment work. Lifeguards compliant with current standards have been fitted to all HSTs still in passenger service².

16. Part b of the recommendation was addressed by Scotrail. Scotrail assessed physical and operational changes to the HST fleet along with potentially replacing the fleet. The report found that all options involving physical or operational modifications, including fleet withdrawal, produced costs that were grossly disproportionate to the potential safety benefits offered. The risk assessment of continued operation (until 2035) of the existing HST fleet without physical modification, demonstrated that the fleet can be managed safely and that the associated risks are as Low as reasonably practicable.

17. Part c. of the recommendation was addressed by the companies that own the majority of the HST fleet - Angel Trains Ltd, Eversholt Rail Ltd and Porterbrook Leasing. The group considered how the approach taken to 19a and b can be applied to the remaining pre 1994 built rolling stock still being operated in GB. The finding were captured in guidance note TN2324 issue 2: Crashworthiness risk assessment for mainline passenger rolling stock.

18. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, owners and operators of HSTs, working with RSSB have:

- taken the recommendation into consideration; and
- taken action to close it.

Status: Closed.

Previously reported to RAIB

19. On 14 May 2025 ORR reported the following:

This recommendation is in three parts and involves HST operators, RoSCo's, ORR, DfT and devolved nation agencies, and RSSB.

Part a. is to assess the crashworthiness of HSTs against the Railway Group Standard GM/RT2100, issue 1, July 1994.

Using the Finite Element model developed for HST as part of Rec 18a, and an extensive review of HST incidents, engineering assessments and the output of Rec 17, a report has been produced which includes a full cost benefit analysis of options for HST enhancements using the same principles as that used in rec 15 and rec 17.

² [Derailment of a passenger train at Carmont, Aberdeenshire on 12 August 2020: ORR letter to RAIB dated 29 November 2024](#)

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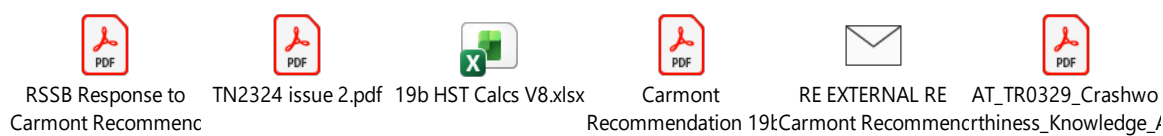
Part b. is directed at Scotrail. It commissioned AtkinsRéalis to evaluate the implications of HST withdrawal from Scotland's network. The AtkinsRéalis report has been submitted to ORR as the response to recommendation 19b and is currently being assessed. .

Part c. is a cross RoSCo workstream, involving Angel Trains Ltd, Eversholt Rail Ltd and Porterbrook Leasing. This considered how the approach taken to 19a can be applied to the remaining pre 1994 built rolling stock still being operated in GB.

The outcomes of the work streams will be guidance on the process to follow when deciding on managing the risks for pre-1994 rolling stock. Once that guidance has been produced, we will consider the recommendation fully addressed

Update

20. On 7 January 2026 RSSB provided the following suite of documents that form the closure response to the recommendation:



Previously reported to RAIB

Recommendation 2

The intent of this recommendation is to identify and correct instances where new works have not been incorporated into appropriate maintenance processes (at present these include Ellipse and Maintenance Scheduled Tasks).

Network Rail should:

- a) take steps necessary to ensure that all elements of infrastructure constructed in Scotland since 2012 that require routine inspections and maintenance are included in the appropriate asset management processes
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ORR decision

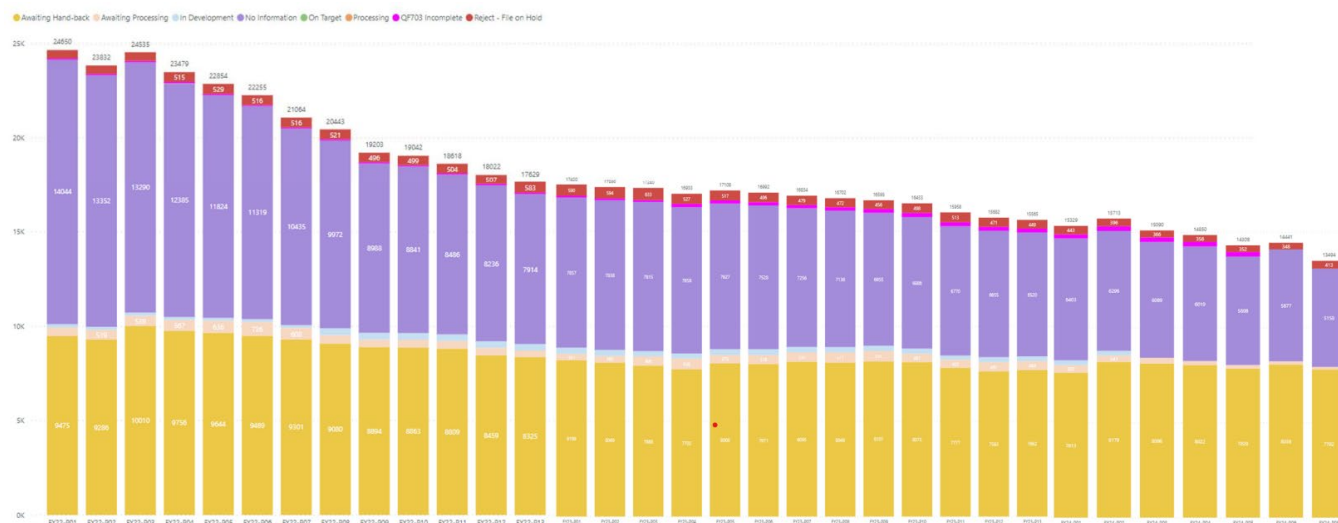
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5. In addition to the work described to identify and correct instances where new works have not been incorporated into appropriate maintenance processes, Network Rail has made the following improvements to process to make it less likely that there will be repeats of the shortcomings found at Carmont (some linked to recommendation 1):

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6. There is regular monitoring of the dashboard that has been established for missing H&S files and MSTs. This involves Route Services, Technical Authority and Network Rail regions. Network Rail's National Records Group has oversight of progress against the action plans.

7. Several regions have recently shared draft closure statements with us. Not all regions are so advanced in what they have completed. The latest date to finish all the planned work is August 2025. We therefore expect to be able to report all actions complete by the end of 2025.

8. 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
- is taking action to close it by December 2025.

Status: Open.

Previously reported to RAIB

9. See Annex B para 1 – 6 for previous ORR response to RAIB.

Update

10. On 28 January 2025 Network Rail provided the following update

Work completed to date

- *Working group formed (Technical Authority, Regions, National Records Group).*
- *Adopted a risk-based approach.*
- *Relevant asset management systems identified.*
- *Relevant processes mapped.*
- *Questionnaire issued to understand priority areas for focus.*
- *Interviews with data managers and subject matter experts.*
- *Health & Safety File status dashboard available.*
- *Update to H&S File standard (INF/02202) published in June 2023.*
- *PACE now requires progressive build-up of H&S File.*
- *Objectives set for DPE/PE/DEM/PMs relating to H&S File provision.*
- *Missing MST reporting and dashboard being used to focus on priority areas.*
- *Questions developed to provide structure for Regional Action Plans.*
- *Closure statement produced for National Action Plan.*
- *5 x Regional Action Plans produced.*
- *Update to Asset Management Process standard (MTC/089) published in December 2023.*
- *Special Topic Audit Carmont Rec A9.20 published in April 2024.*
- *Closure statements submitted and reviewed by National Recommendations Review Panel (NRRP) for NW&C, Southern and W&W Regions in November 2024*

Work to do

- *Working Group continues to meet to monitor progress with the remaining Regional Action Plans and to share good practice. Last meeting was on 9 January 2025.*
- *Closure dates within Regional Action Plans:*
 - *Scotland – 31 March 2025*
 - *Eastern – 1 August 2025*
- *Closure statements will be reviewed by NRRP.*

Recommendation 19

The intent of this recommendation is to evaluate the additional risk to train occupants associated with the continued operation of HSTs, which entered service before modern crashworthiness standards were introduced in July 1994. This will enable the future planning of HST deployment to be informed by a fuller understanding of any additional risk and the costs and safety benefits of any potential mitigation measures. This learning should also inform thinking about the mitigation of similar risks associated with the operation of other types of main line rolling stock.

Operators of HSTs, in consultation with train owners, ORR, DfT, devolved nations' transport agencies and RSSB should do the following:

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previous crashworthiness research (including driver safety), a review of previous accidents, consideration of future train accident risk, the findings presented in this report and any relevant engineering assessments.

b) Based on the outcome of a) and cost benefit analysis, identify reasonably practicable measures to control any identified areas of additional risk for HSTs, and develop a risk-based methodology for determining whether, and if so when, HSTs should be modified, redeployed or withdrawn from service.

c) In consultation with operators of other pre-1994 passenger rolling stock, develop and issue formalised industry guidance for assessing and mitigating the risk associated with the continued operation of HSTs and other types of main line passenger rolling stock designed before the introduction of modern crashworthiness standards in 1994.

ORR decision

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14. This report is also the basis of the response to recommendation 3 contained in RAIB Report 13/2024: *Collision between a passenger train and a fallen tree at Broughty Ferry*.

15. Part b. is directed at Scotrail. It commissioned AtkinsRéalis to evaluate the implications of HST withdrawal from Scotland's network. The AtkinsRéalis report has been submitted to ORR as the response to recommendation 19b and is currently being assessed. .

16. Part c. is a cross RoSCo workstream, involving Angel Trains Ltd, Eversholt Rail Ltd and Porterbrook Leasing. This considered how the approach taken to 19a can be applied to the remaining pre 1994 built rolling stock still being operated in GB.

17. The outcomes of the work streams will be guidance on the process to follow when deciding on managing the risks for pre-1994 rolling stock. Once that guidance has been produced, we will consider the recommendation fully addressed.

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

- taken the recommendation into consideration; and
- are taking action to close it.

Status: Open.

Previously reported to RAIB

19. See Annex B para 57 – 61 for previous ORR response to RAIB.

ORR hosted a meeting on 6 April 2022 (see para 108) with owners and operators of HSTs, together with government bodies and RSSB, to consider how recommendation 19 should be addressed. The initial consideration of the recommendation by relevant parties was done by the Carmont Seniors Group, coordinated by Angel Trains. SNC Lavalin have been commissioned to undertake an HST design review, which is expected to be completed by April 2023. The design review includes FE modelling in conjunction with recommendation 18. The coordination function of the Carmont Seniors group has now been subsumed into the RSSB Carmont Recommendations Steering Group.

Update

20. On 10 March 2025 RSSB provided the following closure statement and supporting documents:



RSSB Response to
Carmont Recommenc



Risk Based
Methodology - Carmc



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