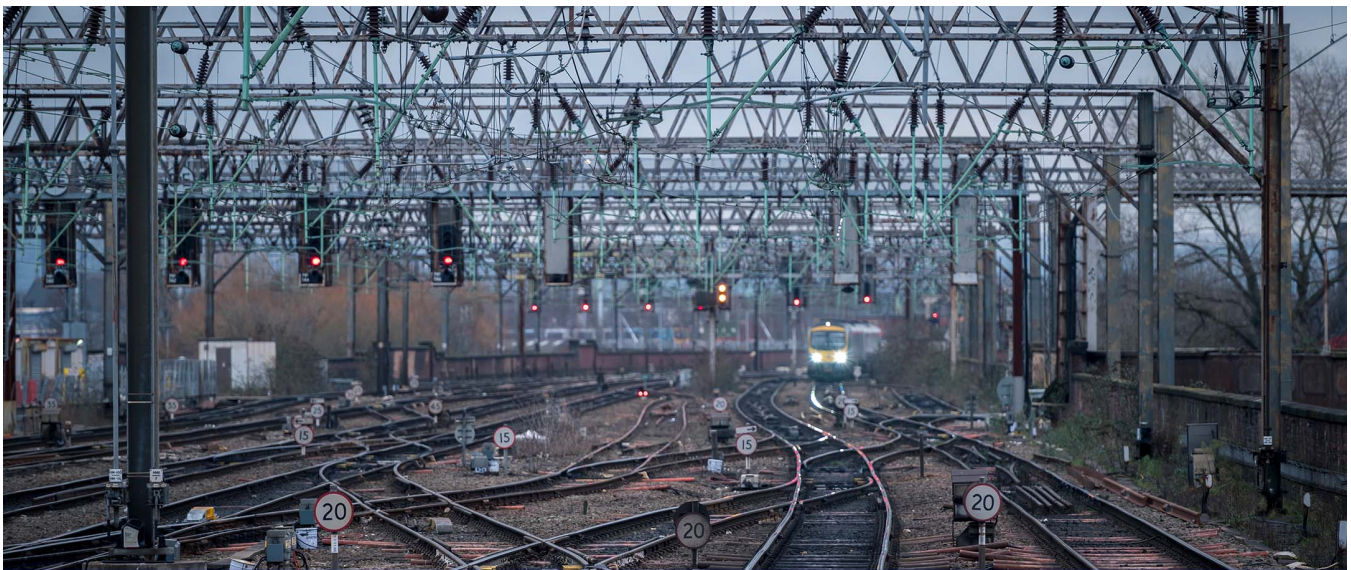


# Annual report of health and safety on Britain's railways 2025 to 2026



**Annual report of health and safety on Britain's railways 2025 to 2026**

## Chief Inspector's review

by Richard Hines

HM Chief Inspector of Railways and Director of Railway Safety



A healthy and safe railway is not created by systems alone. It is built every day through the judgement, decisions, and actions of those who design, operate, and maintain it. Systems matter, but safety ultimately depends on how effectively they are delivered across the railway and embedded in day-to-day operations.

This report sets out our assessment of health and safety performance across Great Britain's railway during 2025 to 2026. The year has been characterised by continued change alongside broadly stable overall outcomes. While there has been good progress in several areas, our findings show that the management of risk is not yet delivering the overall level of control and assurance required.

This challenge comes at a time of increasing complexity. Industry reform, financial pressures and evolving operating models are placing greater demands on systems, people, and organisational interfaces. Maintaining high standards requires strong leadership, clear accountability and assurance that is grounded in operational reality, underpinned by active engagement with the workforce. Trade unions and workforce representatives continue to play an important role in identifying hazards, raising concerns, challenging unsafe practices, and supporting the management of risk.

The creation of Great British Railways (GBR) presents a significant opportunity to strengthen

system leadership, simplify accountability and improve the management of shared risks. If delivered effectively, reform can help address longstanding weaknesses at organisational interfaces and support a more coherent approach to health and safety across the railway.

Although outside the period covered by this report, the recent passenger train collision at Bedford is a sobering reminder that, despite the railway's strong safety record, the consequences of a major accident can be severe. Our thoughts remain with the family, friends and colleagues of the driver who lost their life, and with all those injured or affected by the accident. The causes of the collision remain under investigation.

Drawing on evidence from inspections, investigations and Risk Management Maturity Model (RM3) assessments, this report provides a comprehensive view of performance across the sector. My key reflections from the past year are set out below.

## Network Rail

Network Rail's safety performance remains stable, with progress evident in a number of areas. However, RM3 assessments continue to identify differences in performance across regions and functions, particularly in asset management, workload planning, and the implementation of safe systems of work.

There has been good progress in addressing previously identified gaps in structures management. A significant programme of assessments has provided a better understanding of asset risks and increased assurance over the management of structural risk.

Track worker safety remains a key concern. While progress has been made in reducing higher-risk working practices, recent incidents, including a fatal incident at Radlett, demonstrate that planned protections are not always delivered as intended. Ensuring established safeguards are applied reliably, every time, remains essential.

Level crossing risk has increased, with rising fatalities indicating that existing controls are not always achieving the intended outcome. Incidents such as the Shap derailment also underline the importance of robust infrastructure management in the face of environmental pressures and changing asset conditions. Further improvement will require stronger assurance and greater discipline in the management of known risks.

# Mainline operators and freight

The transition of many passenger operators into public ownership increases the importance of clear accountability and effective safety management across the rail industry.

Overspeeding remains one of the most significant and insufficiently controlled risks on the railway. The causes are well understood, yet progress has been too slow. The challenge is not one of knowledge, but of execution and system leadership. The industry must now move decisively from analysis to action, focusing on known high-risk locations and deploying effective controls at pace. I expect to see far greater urgency and demonstrable improvement in this area.

Workforce risks are also becoming more prominent. Violence and harassment, together with weaknesses in fatigue management and welfare provision, require a more systematic response. Improved cooperation across the industry must now translate into better protection and outcomes for the workforce.

The Freight Safe Wagon Condition Programme demonstrates how coordinated industry action can deliver meaningful improvements in risk management.

## Non-mainline railways

Safety performance across non-mainline sectors remains broadly stable, but differences in management maturity and risk control capability continue to be evident.

Across Transport for London networks, governance arrangements are generally strong. However, operational delivery remains uneven in some areas, particularly in relation to ageing assets, platform-train interfaces, and occupational health arrangements.

In the tram sector, serious incidents remain rare, but weaknesses persist in the management of risks at public interfaces.

Heritage railways continue to rely heavily on individual competence and experience, which can limit organisational resilience.

# Strategy, policy, and regulatory delivery

We have continued to strengthen the regulatory framework while delivering our core statutory functions. This includes progress in modernising train driver licensing, reviewing key legislation such as the Railways and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS), and improving the railway standards framework.

We have delivered a substantial programme of inspections, approvals, and enforcement activity, taking action where necessary to address risk and secure compliance.

Our work with industry, government and international partners continues to promote learning and improvement across the sector. We are also investing in our own capability to ensure we remain an effective regulator of an increasingly complex railway system.

## Themes for the year ahead

Britain's railway continues to operate in an environment of increasing complexity. Our findings point to three priorities that require sustained attention during the coming year.

### **1. Control of risk through transition**

Many parts of the railway will continue to experience organisational and operational change. Duty holders must demonstrate that control measures remain effective as responsibilities evolve, interfaces change and operating models develop. Accountability for managing risk must remain clear at all times. We will work constructively with industry while taking a firm approach where change weakens control or creates uncertainty in risk ownership.

### **2. Assurance grounded in operational reality**

Assurance should provide a clear and tested understanding of health and safety performance. Too often, assurance demonstrates that arrangements exist on paper but provides limited evidence that they are being delivered effectively in practice. Duty holders should ensure assurance is grounded in operational reality, informed by frontline activity and capable of identifying emerging weaknesses before they result in harm. We will challenge assurance arrangements that fail to provide an accurate picture of risk.

### 3. Leadership of system risk and interface failure

Some of the most significant risks arise at organisational interfaces between operators, infrastructure managers, and the wider supply chain. These risks require active leadership, not coordination alone. Leaders must take responsibility for shared risks, align action across organisational boundaries, and address emerging weaknesses before they escalate.

Delivering a healthy and safe railway is a shared responsibility. I would like to thank my colleagues across ORR for their professionalism, expertise and commitment throughout the year, and the many duty holders, workforce representatives, trade unions and industry partners who have worked with us to address risks, share learning, and drive continuous improvement.

The challenges outlined in this report are significant, but they are not insurmountable. The railway has repeatedly demonstrated its ability to learn, adapt and improve.

By maintaining clear accountability, strong leadership, and an unwavering focus on the effective management of risk, we can continue to build a railway that is both safer and healthier for passengers, the workforce, and the communities it serves.

I look forward to working with you in the year ahead.

- → Next Health and safety across the railway sector: the regulator's view

## Health and safety across the railway sector: the regulator's view

### Introduction

This section summarises our key findings across the railway sectors we regulate. It identifies the main risk areas and assesses how effectively these are being managed, drawing on a range of evidence including inspections, investigations, and RM3 assessments.

RM3 is our core tool for assessing the effectiveness of safety management systems. It evaluates how well organisations manage risk across areas such as policy, planning, implementation, monitoring, and organisational control, using a five point maturity scale to identify strengths and areas for improvement.

# Assessing harm and risk performance

We assess safety performance using a combination of actual harm and modelled risk. Actual harm is measured using the Fatalities and Weighted Injuries (FWI) index, while modelled risk uses industry tools such as the Rail Safety and Standards Board (RSSB)'s Safety Risk Model (SRM) and Precursor Indicator Model (PIM), alongside equivalent models in other sectors.

These measures provide valuable insight into risk levels but are largely retrospective. We therefore take a broader approach, combining them with RM3 assessments, inspection evidence, and other intelligence - such as near miss data, asset performance, and safety culture - to form a rounded view of industry performance.

Our analysis also considers wider factors such as passenger and freight volumes, which influence trends in harm and risk.

## Data sources

This report draws on a range of data, including:

- Network Rail performance and assurance reports
- ORR Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) for non mainline sectors
- Industry incident reporting and inspection outcomes
- RSSB's Safe Insights database and PIM dashboard

Safety data for April 2025 to March 2026 will be published separately in our annual statistical release in September 2026.

- ← Previous Annual report of health and safety on Britain's railways 2025 to 2026
- → Next Track and train: Network Rail and train operators

## Track and train: Network Rail and train operators

# Rail reform context and the safe transition to GBR

The transition to public ownership of train operators is underway following the Passenger Railway Services (Public Ownership) Act 2024, with further transfers planned through 2026 and 2027. This is taking place alongside the development of GBR, bringing together track and train into a more integrated system. We continue to assess Safety Certificates and Authorisations and oversee Network Rail's Safety Authorisation to ensure that safety management systems remain effective throughout this transition.

This period of change presents risks to the continuity and effectiveness of safety management arrangements across both infrastructure and operations, particularly where responsibilities, interfaces and governance structures are evolving. It is essential that duty holders maintain clear accountability and effective control of risk throughout.

We have been actively engaged in rail reform since the Williams Rail Review, working closely with the GBR Transition Team, Department for Transport, Network Rail, operators, RSSB, and trade unions to understand and manage these risks. This has included workshops with senior industry and workforce representatives to gather insight on key safety issues.

We have published our Guiding Principles for Great British Railways' Health and Safety Management System, setting out the outcomes we expect under future arrangements. These principles support clear accountability, effective interfaces, and robust safety governance, without prescribing structures.

We will continue to provide proportionate and transparent regulatory oversight throughout the transition to ensure that safety risks are effectively managed, and that GBR is established with a stable and resilient safety management system from day one.

## Network Rail

As the infrastructure manager, Network Rail plays a central role in delivering system-wide safety outcomes. The following section summarises our assessment of its current performance and key risk areas.

**Key messages:**

- Network Rail has made good progress in addressing previously identified gaps in structures management. A significant programme of assessments has provided a better understanding of asset risks and increased assurance over the management of structural risk.
- A recent fatal incident and other high-potential events show that trackworker safety remains a key risk, particularly in ensuring protection arrangements are not only well planned but consistently applied in practice.
- Level crossing risk is increasing, with a rise in fatalities indicating that existing controls are not delivering consistently and that greater focus is needed on implementation and effectiveness.
- Incidents such as the Shap derailment highlight the need for robust infrastructure management, including effective monitoring, maintenance, and response to emerging risks such as those driven by weather and asset condition.
- Continued improvement depends on stronger assurance and more consistent risk management, particularly in delivery of control period 7 (CP7) plans, alongside sustained focus on controlling occupational health risks.
- Overall safety performance is stable, but weaknesses remain in parts of the safety management system, with RM3 assessments highlighting variability and inconsistent application in key risk areas.

## **Network Rail's management maturity (RM3)**

We completed nearly 400 RM3 assessments across Network Rail through our frontline inspector activities, covering central functions and regions. These show variability in the consistency and effectiveness of safety management system application.

Most areas were assessed as standardised. However, Workload Planning, Asset Management, Change Management and Safe Systems of Work each included some ad hoc ratings. This indicates that arrangements are not always applied consistently and there is a greater risk of non-compliance.

## **Risk performance**

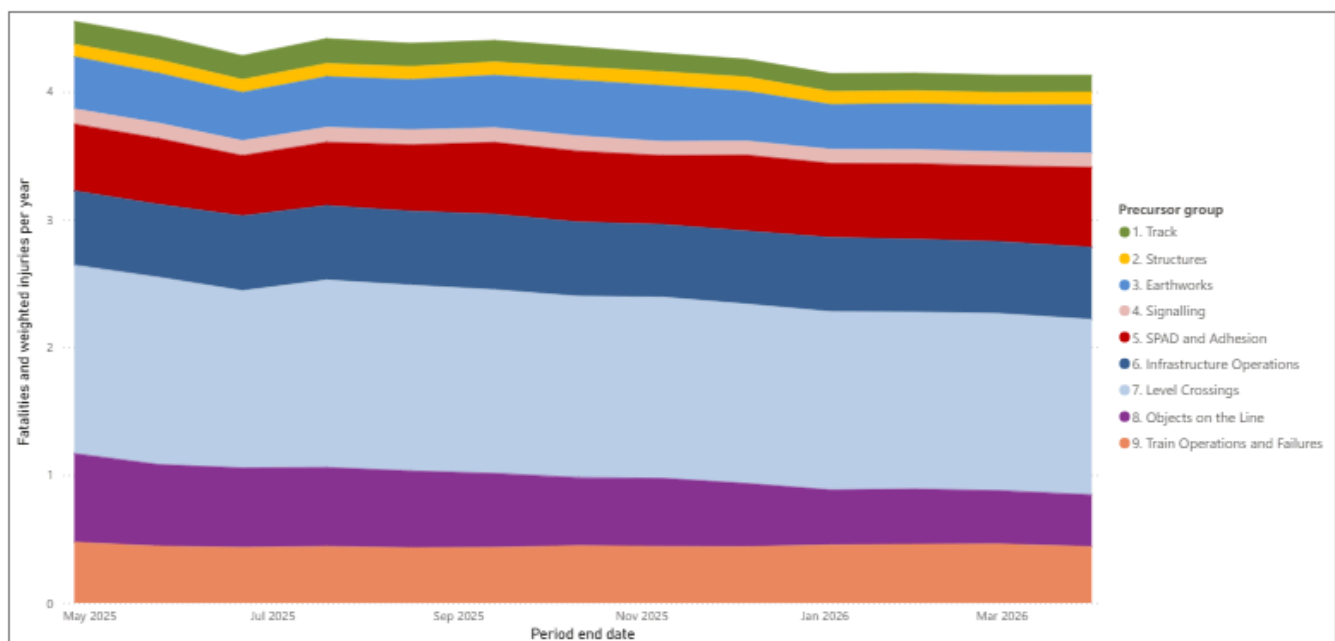
In 2025 to 2026, 29 high-potential train accident incidents were reported (2024 to 2025 revised to 28), of which twelve involved level crossings.

Risk from objects on the line has reduced, particularly vehicle incursions. Signal passed at danger

(SPAD) and adhesion risk has slightly increased, though adhesion's contribution has fallen. Train operations risk has risen due to overspeeding.

There were twenty high-potential workforce safety events (down from 30 last year), mostly involving trackworkers on open lines. Slips, trips, and falls remain the main contributor to workforce injuries. One case of Pontiac fever followed Legionella exposure. Workforce precursor risk rose slightly from 0.067 to 0.069.

Figure 1: PIM trend April 2025 to March 2026



Source: RSSB

## CP7 health and safety delivery plan

Network Rail's CP7 delivery plan remains the key reference point for assessing progress against its health and safety commitments.

During the year, financial pressures have affected the delivery of renewals and other planned work. Where activities are deferred or reduced, Network Rail must demonstrate that risks have been properly assessed and that suitable mitigations are in place.

We will continue to challenge and seek assurance that safety risk is being effectively managed in these decisions.

## Structures and operational property

Network Rail is responsible for over 30,000 structures and 2,500 stations, making effective inspection and assessment arrangements essential to safety.

Our inspections previously identified compliance gaps affecting around 4,500 structures and operational property assets. Following regulatory intervention, Network Rail confirmed that risk assessments were in place for these assets.

During 2025 to 2026, we required completion of structural capacity assessments where these were missing. This work is now largely complete, with plans in place to address the small number of remaining assets.

Overall, Network Rail has made good progress in addressing previously identified gaps, with more than 1,100 assessments completed and increased assurance that structural risks are being managed.

## Trackworker safety

The fatality at Radlett in March 2026 highlights the importance of correct protection arrangements. In this case, work was carried out on an open line rather than the protected line.

There has been a step change in moving away from red zone working to safer green zone arrangements. However, incidents continue where planned protections are not correctly applied or followed.

In 2025 to 2026, there were 12 high-potential incidents. While this is a reduction overall, some incidents were more severe in nature, including cases where workers were on open lines with protection in place at entirely different locations.

Network Rail has established Safety Task Force 2 to improve how safe access is planned and delivered. We will continue close engagement to ensure sustained improvement, alongside our investigation into the Radlett incident.

## Level crossings

Fatalities at level crossings have increased significantly, from 1 in 2023 to 2024 to 5 in 2024 to 2025, and 11 in 2025 to 2026. This reinforces the need for sustained and consistent risk control.

Network Rail is progressing upgrades such as miniature stop lights, additional barriers, and exploring new technologies to reduce reliance on at-grade crossings.

Our inspection campaign on passive crossings found that risk management processes are in place and generally effective. Narrative Risk Assessments were present, and controls broadly aligned with the hierarchy of control.

However, there is variation in the quality, supporting evidence and review of these assessments, as well as in the timely delivery of improvements. Overall, risk is managed at a broadly standardised level, but greater consistency and stronger assurance are needed across regions.

### **Investigation of collision and derailment at Shap, Cumbria**

In November 2025, a passenger train derailed near Shap after striking material from a landslide caused by blocked drainage and heavy rainfall. Injuries were fortunately, minor.

Although monitoring equipment had been installed at this high-risk location, it did not prevent the incident.

Our investigation is ongoing and is considering infrastructure management, maintenance arrangements, and the effectiveness of monitoring systems and alarm responses.

### **Occupational Health Matters**

We served an Improvement Notice following reports of worsening hand-arm vibration (HAVs) exposure at London Bridge Delivery Unit. We have engaged with Network Rail to reinforce the need for risk assessments to be based on task-related exposure rather than individual tools alone.

Since the closure of the Improvement Notice relating to welding fume exposure, we have raised concerns regarding employee awareness and understanding of the newly implemented requirements and associated equipment.

We continue to engage with Network Rail to ensure lessons from earlier enforcement are identified and applied across the wider organisation.

### **Case Study 1: Track maintenance and assurance**

The freight train derailment at Audenshaw in September 2024 highlighted the significant safety

risks that arise when maintenance and assurance systems fail to operate effectively.

In 2025, our investigation found that Network Rail had not planned or delivered maintenance effectively, and that assurance arrangements were not providing sufficient challenge or escalation. These failings were linked to wider systemic weaknesses, including gaps in engineering capability, weak local oversight, poor defect management, and ineffective coordination between teams. An Improvement Notice was served in April 2025.

By April 2026, we accepted that Network Rail had achieved compliance, supported by a national review of inspection regimes, targeted interventions in delivery units, and actions to strengthen engineering capability, safety culture, and assurance within its Safety Management System.

While this represents clear progress, the case demonstrates that such failures are often systemic rather than isolated. We will continue targeted oversight to ensure improvements are sustained, with a continued focus on strengthening maintenance discipline, assurance effectiveness, and early identification of risk across the network.



## Case Study 2: Occupational Health – Welding Fume

Network Rail carries out many thousands of welding activities each year, creating a significant risk of exposure to welding fume. This exposure is linked to serious and often irreversible health effects, including lung cancer, occupational asthma, respiratory irritation, and metal fume fever. These risks require robust assessment and effective control at source.

Through various interventions and engagement, we identified that Network Rail had not carried out suitable and sufficient risk assessments, nor identified or implemented adequate controls. An Improvement Notice was served in February 2024.

Following resolution of an appeal, Network Rail responded positively, and by February 2026, we accepted that Network Rail had achieved compliance, supported by strengthened risk assessments and the introduction of improved reasonably practicable control measures.

While this represents clear progress, sustaining and embedding these improvements remains essential. We will continue targeted inspections and engagement to ensure welding fume risks are effectively managed and workers' health is protected over the longer term.



## Mainline train operators and freight

### Key messages:

- During rail reform, operators must maintain robust safety management and clear accountability, ensuring that organisational change does not weaken control of risk.
- Overspeeding remains a key system-wide risk, requiring sustained cross industry collaboration, better use of data, and more consistent application of effective controls.
- Workforce risks are increasing, particularly violence and harassment, and require a more systematic approach including prevention, mitigation, and staff support.
- Operators need to improve the consistency of welfare provision and fatigue management, ensuring that commitments translate into practical, embedded arrangements across the

network.

- Continued focus is needed on coordinated, whole-system responses to operational risks, including effective management of stranded passengers through improved communication and multi agency working.

## **Overspeeding**

Overspeeding remains a significant system risk and a precursor to derailment or collision. Previous incidents, including at Spital Junction, demonstrate how close trains have come to potentially catastrophic outcomes.

Our inspections found that early progress in addressing this risk was slow, with limited information sharing, inconsistent approaches, and over reliance on administrative controls rather than more robust or technological solutions.

Following a further incident on the East Coast Mainline, in December 2025 the Chief Inspector convened an urgent cross industry meeting with Network Rail and train operators to accelerate progress in addressing the underlying issues and implementing Rail Accident Investigation Branch (RAIB) recommendations. This meeting provided a clear point of focus for industry leadership and set expectations across three key areas: improving information sharing to better target risk, strengthening cross industry coordination and accountability, and making better use of data to understand and manage overspeeding risk.

This intervention has had early impact. There has been good progress in developing joint risk assessments for high risk junctions and a stronger focus on collaboration across infrastructure managers and operators. Industry groups, including the Rail Delivery Group (RDG) and RSSB, are also progressing work to establish more coordinated leadership arrangements.

However, further incidents, including at Cambridge Junction, show that risks remain and that the robustness and consistency of risk assessments still need to improve. Overall, arrangements remain uneven and are not yet consistently proactive across the system.

## **Welfare for Railway Workers**

There has been strong initial commitment to improving welfare facilities, including 26 organisations signing the Welfare Charter. However, progress has been uneven and industry momentum has slowed.

Key barriers remain, particularly around coordination, shared access to facilities, and consistent delivery across different parts of the network. A refocussed programme is now underway with RSSB to strengthen leadership, improve collaboration, and establish clearer expectations and milestones.

We will continue to assess welfare provision through inspections and engagement, while encouraging wider adoption of the Charter. Sustained focus is needed to translate commitment into practical improvements and ensure workers have consistent access to appropriate facilities.

## **Fatigue**

Our fatigue programme is improving understanding of fatigue as a safety risk and setting clearer expectations through updated guidance and ongoing engagement with industry.

Inspection evidence shows that, while progress is being made, fatigue management arrangements are not yet consistently embedded or operating as part of a mature, system wide approach. Controls are often reactive, with limited use of data to proactively identify and manage risk.

Further work is needed to integrate fatigue management more fully into safety management systems and support earlier intervention. We will continue its programme of inspections and targeted engagement to drive more consistent and effective control of fatigue risk.

## **Stranded Passengers**

The industry has continued to develop its approach to managing stranded train incidents, supported by guidance from RDG and practical resources from RSSB. These focus on improving preparedness, strengthening response capability, and prioritising passenger welfare.

There is growing emphasis on coordinated, multi agency working and a whole system approach, recognising that effective management depends on clear roles, communication, and collaboration across organisational boundaries.

We welcome this progress, particularly the focus on shared learning and continuous improvement. We will continue to monitor how effectively these arrangements are applied in practice, including during operational incidents.

## **Violence and harassment to Railway Workers**

Violence and harassment towards railway staff is increasing and remains a significant concern. Wider trends in poor passenger behaviour, alongside serious incidents, highlight the risks to staff and the public.

The industry has responded with guidance and practical measures, including improved reporting and the use of body worn cameras, helping to build a more consistent approach to managing these risks.

However, this must be treated as a core health and safety issue, not solely a security matter. Duty holders need systematic arrangements covering risk assessment, prevention, training, and post incident support.

We will continue to engage with industry to clarify expectations, promote good practice and support more effective, coordinated action to reduce risks to frontline staff.

## **Collaboration with Industry Groups**

We continue to engage with key industry forums to drive health and safety improvements across passenger and freight operators. Notable examples include:

### **Freight Safe Steering Group and National Freight Safety Group**

- Progressing the Wagon Condition Programme to improve wagon safety through better maintenance and train preparation; on track for completion in July 2026.
- Developing the Freight Precursor Indicator Model, providing improved data on derailment risks specific to freight, including wagon condition and operational factors.
- Coordinating action to improve welfare facilities for freight drivers, with all freight operators signed up to the Welfare Charter.

### **Passenger Operators Safety Forum**

- Supporting development of industry guidance on station inspection.
- Coordinating operator feedback on controls to prevent trains entering service with defective sanding systems, following issues highlighted by the 2024 Talerddig incident.

These forums play an important role in improving coordination, sharing good practice, and

supporting consistent risk management. They demonstrate the significant benefits of good collaboration between different parts of the system to address important issues.

- ← Previous Health and safety across the railway sector: the regulator's view
- → Next Non-mainline railways, digital safety, and safety by design

## Non-mainline railways, digital safety, and safety by design

### Key messages:

- Recent disruption in the Channel Tunnel highlights the importance of resilient operations and effective incident response, particularly in managing complex cross border infrastructure and minimising passenger impact.
- Across Transport for London (TfL), variation in management maturity remains, with a need to improve the consistent application of risk controls, particularly for ageing assets, platform train interface risks, and occupational health.
- Safety performance across the tram sector remains broadly stable, with serious incidents continuing to be rare. However, inconsistencies in risk assessment, delivery of control measures, and management of health risks remain areas requiring further attention.
- Heritage railways generally manage risks effectively in practice, but management maturity remains limited, with greater reliance on individual competence than on systematic and consistently applied processes.
- Digital and software related risks are increasing as systems become more integrated, requiring stronger, more coordinated approaches to managing operational technology and digital safety across the system.
- Early engagement with projects continues to support health and safety by design, helping to ensure that risks are identified and managed at the earliest stages of development.

## Channel Tunnel

We provide leadership, advice and secretariat support to the Intergovernmental Commission (IGC) and Channel Tunnel Safety Authority (CTSA), with the IGC currently acting as the safety regulator for the UK half of the Tunnel.

The introduction of new bi national legislation led by the Department for Transport (DFT), reflecting the post European Union (EU) regulatory framework, is now expected in 2027. ORR is preparing to take on National Safety Authority responsibilities and is working with UK and French counterparts to establish effective future governance and regulatory arrangements.

Over the reporting period we have:

- Continued engagement with Eurostar on the design and introduction of new rolling stock, including double deck trains intended to replace the existing e300 fleet.
- Carried out inspections of Eurotunnel's arrangements for managing infrastructure, including drainage systems and civil assets, alongside risks such as manual handling.
- Completed the assessment of Eurotunnel's application for renewal of its safety authorisation, identifying improvements in the structure and documentation of its safety management system.

## December 2025 disruption

The Channel Tunnel experienced significant disruption on 30 to 31 December 2025, following a series of incidents affecting both Eurotunnel and Eurostar services. These included overhead line failures and stranded trains, resulting in suspension of services and prolonged loss of power for some trains.

Although there were no injuries, thousands of passengers were affected, highlighting the challenges of managing resilience and passenger welfare in a complex, cross border system.

At the request of the Rail Minister, ORR and the IGC are undertaking a joint review, led by an independent expert, to understand the causes of the disruption, assess the effectiveness of the response, and determine how lessons from previous incidents have been applied. Findings are expected in Autumn 2026.

## Transport for London (TfL)

Our RM3 assessments identified variation in management maturity across TfL's directly managed operations and its concession operators. While leadership, policy and governance arrangements are generally well established, the consistent application of risk controls at operational level remains uneven, particularly across different parts of the network.

During the year, we focused on key risk areas, including ageing infrastructure, platform train interface safety, and occupational health, particularly the control of Legionella. TfL has continued to improve its use of safety data and performance metrics, providing better visibility of trends and emerging risks, although further work is required to ensure this data is consistently used to support proactive decision making.

On London Underground, our work highlighted opportunities to strengthen asset management and assurance processes, and to improve the quality and consistency of risk assessments. In particular, there is a need to better demonstrate that risk controls are effective in practice and that risks are reduced so far as is reasonably practicable.

On the Docklands Light Railway, we investigated risks associated with the introduction of new rolling stock following a station overrun incident. We are continuing to engage with the operator and infrastructure manager to ensure that technical modifications, operational controls, and assurance processes are robust prior to the fleet returning to service.

### **Case Study 3: Management of Legionella Risk in Train Wash Systems**

Train wash systems present a higher risk of exposure to Legionella due to their operating conditions, including aerosol generation and intermittent use. Effective management requires robust risk assessment and control measures in line with COSHH and the Approved Code of Practice (L8).

In 2025–26, our inspections found that LUL had not consistently implemented suitable and sufficient risk assessments, and that governance arrangements were unclear. There was limited evidence of competent responsible persons, and written control schemes were not consistently in place. Although sampling and dosing activity was taking place, there was insufficient assurance that risks were being effectively managed in a systematic and consistent way.

As a result, we undertook targeted engagement with LUL to secure a programme of corrective actions. This included completing risk assessments and written schemes across affected sites, clarifying roles and responsibilities, and delivering training for those responsible for managing Legionella risks. Some higher risk systems were removed from service or decommissioned.

LUL has since established a structured programme to address these issues, supported by improved governance and clearer accountability. While this represents good progress, embedding these arrangements and demonstrating their effectiveness in practice remains essential. We will

continue to conduct targeted inspections and engagement to ensure that Legionella risks are consistently and effectively controlled over the longer term.



## Trams and Light Rail

Safety performance across the tram sector remains broadly stable, with serious incidents continuing to be rare. However, there have been increases in lower consequence events such as low speed derailments and collisions at crossings, reinforcing the need for continued focus on risk control.

Inspection activity identified variation in the quality of risk assessment and the application of control measures, particularly at pedestrian and highway crossings where risk is influenced by local conditions. While operators generally understand the risks, controls are not always applied consistently or reviewed effectively.

The sector demonstrates established arrangements for contractor management and safe delivery of work, but we identified recurring weaknesses in the implementation and assurance of risk controls, including limited follow through on identified improvements.

The management of occupational health risks requires further attention, with weaknesses identified in COSHH assessments, which are often generic or insufficiently reviewed. We have supported improvement through engagement with the Light Rail Safety and Standards Board, including industry workshops and changes to reporting processes.

Progress following the Sandilands derailment continues, although some technical measures, including overspeed protection and driver vigilance systems, are not yet fully implemented across all networks.

## Heritage and Minor Railways

Overall safety performance remains stable, with incident trends broadly consistent with previous years. However, some precursor events, including trains passing the end of their authority, have increased, particularly during peak operating periods and special events.

Our inspections found that risks are generally controlled in practice, supported by experienced staff, and established operational practices. However, management maturity remains limited, with continued reliance on individual competence rather than systematic, evidence based processes.

Key areas for improvement include competence management for safety critical roles, the quality and consistency of record keeping, and the management of occupational health risks. In many cases, controls rely heavily on personal protective equipment rather than more effective measures at source.

We continue to support the sector through targeted inspections, enforcement where necessary, and collaborative work with the Heritage Railway Association, including workshops aimed at improving capability and sharing good practice.

# Digital Safety

Digital and software related risks are becoming increasingly significant as the railway becomes more dependent on integrated systems and operational technology. While awareness of these risks is growing, management approaches are still developing and not yet consistently embedded across the sector.

We have continued to strengthen our internal capability and have developed a Digital Safety Strategy, supported by a new Strategic Risk Chapter, to clarify expectations and provide direction for industry. This work has been informed by engagement with a wide range of stakeholders.

Further work is needed to ensure that digital and operational technology risks are fully integrated into safety management systems, with clear processes for identifying, assessing, and controlling risks associated with software failure and system interaction.

We will continue to engage with industry to support a more mature, coordinated approach to digital safety risk management.

# Health and Safety by Design

We continue to engage early with rail projects of all sizes to influence design decisions and embed health and safety considerations from the outset. This includes both large scale infrastructure programmes and smaller schemes.

Updated guidance and a refreshed Strategic Risk Chapter provide clearer direction to industry, supporting duty holders in understanding regulatory expectations and applying good practice.

Early engagement enables risks to be addressed at the point where interventions are most effective, reducing the need for later corrective action and improving safety outcomes.

- ← Previous Track and train: Network Rail and train operators
- → Next Health and safety strategy, policy, and regulatory delivery

# Health and safety strategy, policy, and regulatory delivery

## Key messages:

- We have continued to develop and improve the railway health and safety regulatory framework, streamlining processes while delivering core statutory functions, including train driver licensing.
- Work with government has progressed to modernise the train driver licensing regime, reducing administrative burden, and ensuring it remains fit for purpose as technology and workforce requirements change.
- We have undertaken targeted reviews and policy development, including the ROGS post implementation review and updates to the railway standards framework, to support effective and proportionate regulation.
- Our collaboration with industry, other regulators and international partners continues to support consistency, share best practice and drive improvement across the rail system.
- We have delivered a broad programme of statutory approvals, inspections, and enforcement activity, using our powers to address risks and secure compliance with health and safety law.
- We are investing in our future regulatory capability, through recruitment, training, and professional development, to ensure we maintain the skills and capacity needed to regulate an evolving railway.

## Improving legislation and processes for train driving licences

The Train Driving Licences and Certificates Regulations 2010 (TDLCR) implemented an EU-wide system of train driver licensing and certification based on common standards. We have issued over 29,000 licences to train drivers in Great Britain.

Following a 2023 post-implementation review that demonstrated a case for change, we worked closely with the DfT throughout 2025 to 2026 to develop options to improve the regime. This focused on reducing costs by streamlining requirements and processes and considering legislative changes to reflect technological and medical advances. These changes are expected to significantly reduce industry burdens, with a DfT consultation planned for 2026 to 2027.

DfT also prioritised lowering the minimum age for train drivers from 20 to 18, announced in May

2025. ORR and DfT reviewed industry implementation plans and were satisfied they met the criteria set by the Minister for Rail. Legislation was laid in February 2026 and came into force on 30 June 2026. The TDL Portal has been updated accordingly.

We enhanced the TDL Portal, streamlining employer information requirements to reduce administrative burden within legislative constraints. We delivered rising volumes of licences and improved forecasting with operators to support future demand, with volumes expected to peak in 2028 as 10-year licences come up for renewal. We also updated all related guidance and processes.

## Case study 4: Simplifying Train Driver Licensing

Ahead of planned TDLCR reforms, we continued to improve the current regime. Building on previous work and engagement with train operators, we further invested in train driver licensing IT. The enhanced TDL Portal now supports more functionality online (reducing reliance on email), enables employers to track applications, update key fields, and receive alerts for soon to expire licences.

We also reviewed and refined our guidance, clarifying expectations and reducing the information required from employers - delivering direct efficiency benefits. Further portal enhancements are planned for next year.

Through the ROGS post implementation review, we sought stakeholder views on streamlining processes to reduce burdens without compromising safety. We also explored whether ROGS supports the use of new technologies, including AI. The review identified opportunities for minor changes, such as reducing safety reporting requirements and simplifying elements of certification. It confirmed that ROGS is broadly technology neutral, though additional guidance could help organisations adopt digital and AI tools in safety systems.

We continued to monitor delivery of recommendations from our work on the costs and benefits of safety, which highlighted the need for greater consistency in assessing reasonable practicability and using cost-benefit analysis (CBA). This included further CBA training for staff and engagement with other regulators to share approaches that support both compliance and innovation.

## Other policy developments and improvements

We completed a post-implementation review of ROGS on behalf of DfT, providing a draft report well ahead of the August 2026 deadline.

ROGS set the rail safety framework across mainline railways, metros, tramways, light rail, and heritage railways, requiring operators to maintain safety management systems and hold certification from ORR.

We gathered stakeholder input through eleven engagement sessions and used this evidence to develop draft findings and recommendations, including improvements to guidance and ways to reduce administrative burden.

We worked with the Health and Safety Executive (HSE) and the Department for Business and Trade (DBT) on the Employment Rights Bill, supporting guidance on suitable work for children in heritage railways. This was welcomed by the Heritage Railway Association and led to a statutory duty for ORR and HSE to produce guidance by December 2026. Work began in 2025 to 2026, with publication expected in the Summer of 2026.

We also worked with RSSB to assess the effectiveness of the railway standards framework. In January 2026, we approved updates to the Railway Standards Code, including establishment of an Industry Leadership Group to provide strategic direction and escalation. We continued to support interoperability authorisation and the application of standards.

## Working with other regulators, safety authorities, and industry bodies to share best practice and aid continuous improvement

### Our international engagement

Our updated international engagement strategy reflects the post EU Exit environment, aligns with wider government priorities, and focuses on maximising benefits for ORR, government, and the British rail industry.

Although we received fewer engagement requests than in previous years, we hosted two inward

visits - from Dubai's Road and Transport Authority and Saudi Arabia's Transport General Authority (TGA) - supporting valuable knowledge exchange on railway health and safety. Under our Agency Agreement with Northern Ireland's Department for Infrastructure, we also provided operational support through inspection activity.

We continued to participate in key forums, including RESCOR in Dublin in October 2025, and attended European Union Agency for Railways (ERA) National Safety Authority Network meetings as an observer, alongside several ERA subgroups. These forums support experience sharing and help us monitor European developments relevant to the Channel Tunnel and domestic railways.

We also maintained an active role in the International Liaison Group of Government Railway Inspectorates (ILGGRI), providing the secretariat and supporting knowledge sharing on health and safety and operational risk across participating authorities.

### **Case Study 5: Engagement with the Transport General Authority of Saudi Arabia**

The Transport General Authority of Saudi Arabia is an important stakeholder for the UK Government. As part of our support, we engaged extensively with TGA during 2025 to 2026. This included two ORR colleagues attending the Saudi International Rail event in Riyadh in October 2025 as part of a wider UK delegation. We spoke on a panel, and colleagues took part in a site visit and broader UK led engagement with TGA.

To further support the UK–Saudi relationship, we hosted four TGA delegates in London in April 2026. The visit included high level discussions on health and safety regulation and key operational risks. Delegates visited St. Pancras International, travelled on London Overground, Underground, and mainline networks with ORR's Operations team, and observed our regulatory liaison with stakeholders. The visit provided valuable mutual insight and strengthened information exchange on regulatory approaches and key safety issues.



## Our external health and safety committee

Since April 2025, we held four meetings of the Railway Industry Health and Safety Advisory Committee (RIHSAC), with ORR Board non executive director Ian Dobbs becoming Chair in February 2026. The committee brings together employers, employees, trade unions, passengers, and government to advise and constructively challenge ORR's Board on health and safety matters.

Topics discussed included rail sector transformation, passenger welfare during stranded train incidents, risks from trains passing the end of authority (including SPADs), ORR's risk profiling outcomes, mental and occupational health, and annual safety reports from ORR, RSSB, and RAIB.

## Our engagement and collaboration with other regulators

We maintained close working with the Health and Safety Executive (HSE) as co regulators, covering shared policy and operational priorities. This included reviewing inter agency agreements on road vehicle incursions and safety by design, and joint work towards potential ratification of an International Labour Organisation convention on occupational health and safety.

Following HSE's post implementation review of RIDDOR, we worked together to ensure alignment in guidance to duty holders and continue to support consultation on future legislative changes.

We also collaborated with HSE and the Office for Nuclear Regulation to maintain clarity on the duty to reduce risks 'so far as is reasonably practicable' and ensure consistent regulatory approaches and communications.

We remained active in the UK Health and Safety Regulators' Network (UKHSRN), with our Chief Inspector Richard Hines becoming Chair in 2026.

## Case Study 6: Building our future capability

In October 2025 we recruited a further ten trainee Inspectors to ensure we build capability and resilience in ORR's ability to continue to regulate the railways. The trainees come from a mix of previous rail industry and regulatory experience. They will work towards gaining the National Examination Board in Occupational Safety and Health (NEBOSH) diploma in Railway Regulatory Health and Safety qualification, learning all the necessary regulatory legal and railway technical skills they need through a blend of classroom and practical "on the job" training. The trainees are supported by our Learning and Development Team, who deliver the formal classroom learning, and our Operational Training Team, drawn from our Inspectors, who teach them the details of how to be an inspector.

Below shows our new cohort 2026 Inspectors in training visiting the North Yorkshire Moors Railway, accompanied by members of the Operational Training Team, for their initial railway induction on 3 to 6 March 2026.

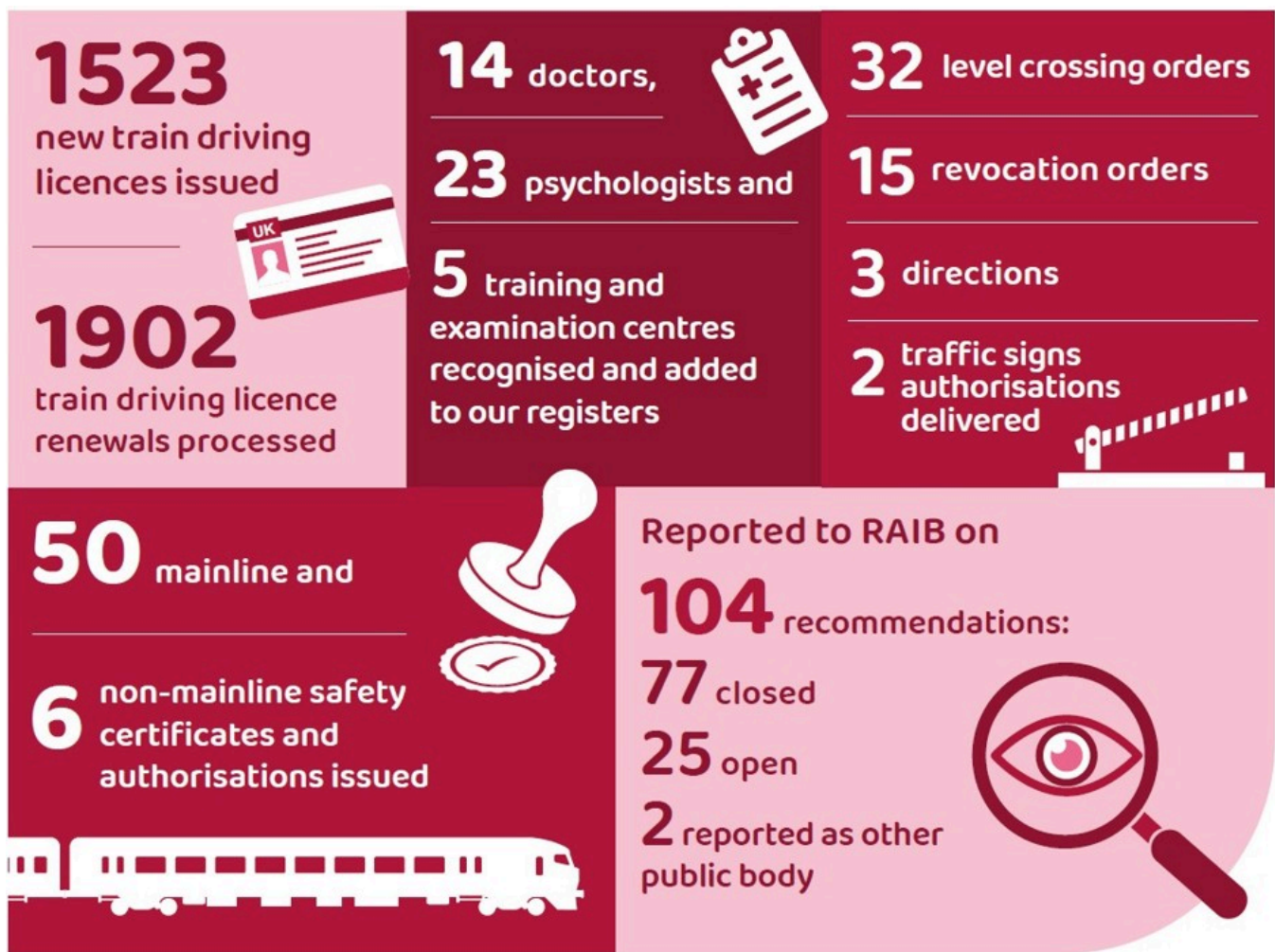
Preparations are already underway to recruit and train around 10 Inspectors and Inspector Assistants in the next 12 months.



## Delivering a range of statutory work

We grant a range of health and safety permissions and approvals, often to statutory deadlines, supporting an effective railway safety framework and train driver licensing regime.

While we aimed to meet all service standards, train driving licence renewals experienced some delays due to high demand, although new licence applications consistently met targets. A summary of our work in 2025 to 2026 is provided below:



Source: ORR

- ← Previous Non-mainline railways, digital safety, and safety by design
- → Next Our key enforcement activities

## Our key enforcement activities

### Investigation and enforcement

Our enforcement work is central to maintaining rail health and safety standards. We use statutory powers to address serious risks and breaches of the law. Improvement Notices require remedial action where significant breaches occur, while Prohibition Notices are used where there is an imminent risk of serious injury. In 2025 to 2026, we issued eight Improvement Notices and no

Prohibition Notices.

We also prosecute where necessary. During the year, we concluded one prosecution under the Health and Safety at Work etc. Act 1974:

- First Greater Western Limited (Great Western Railway) was fined £1 million on 3 October 2025 following a fatal incident in December 2018 near Twerton. A passenger sustained fatal head injuries after leaning out of a droplight window and striking a tree branch. Our investigation found GWR had delayed producing a written risk assessment despite earlier incidents and had not implemented all identified risk controls before the accident.

We continued to support the Fatal Accident Inquiry (FAI) into the 2020 Carmont derailment, in which three people died. Final hearings took place in early 2026, with submissions made in March; we now await the Sheriff's determination.

In April 2025, we received the Sheriff's determination into the 2018 fatality at Saughton Tram Crossing in Edinburgh. The Sheriff found that the issues had been addressed and made no further recommendation.

- ← Previous Health and safety strategy, policy, and regulatory delivery
- ← Previous Health and safety across the railway sector: the regulator's view
- → Next Non-mainline railways, digital safety, and safety by design