

**Oliver Stewart**  
**RAIB Recommendation Handling Manager**



7 April 2025

Mr Andy Lewis  
Deputy Chief Inspector of Rail Accidents

Dear Andy,

**RAIB Report: Signal passed at danger at Stafford Trent Valley Junction No. 1  
on 22 August 2023**

I write to report<sup>1</sup> on the consideration given and action taken in respect of the recommendations addressed to ORR in the above report, published on 17 June 2024.

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 1 & 2 is '**Closed**'.

We do not propose to take any further action in respect of the recommendations, 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

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

## Initial consideration by ORR

1. Both recommendations were addressed to ORR when the report was published on 17 June 2024.
2. After considering the recommendations ORR passed both recommendations to Freightliner 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 to the attention of other FOCs and TOCs that may operate light locomotives as it was concluded that there are equally important lessons for them. ORR did not ask these organisations to provide a 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 for Freightliner to more effectively manage the risks associated with the operation of light locomotives.*

Freightliner should review its risk assessments and processes associated with the operation of light locomotives, including those for managing test runs, to ensure that any inherent operational risk is recognised and mitigated. This review should include consideration of the required competence and experience of staff involved, their training and the provision of any information to them that could be relevant. Freightliner should introduce any necessary changes identified as part of this review.

This recommendation may also be applicable to other freight operating companies and to any other transport undertakings that operate light locomotives.

## ORR decision

5. Freightliner has provided evidence of having carried out a review of its risk assessment associated with operation of light locomotives. Freightliner confirmed that the review took account of all aspects of light locomotive operation in addition to those aspects relevant to the Stafford SPAD incident, namely test run and training and competence of staff.
6. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Freightliner has:
  - taken the recommendation into consideration; and
  - has taken action to close it.

**Status: Closed.**

## Information in support of ORR decision

7. Freightliner provided the following initial response dated 2 October 2024:

*Freightliner has introduced a procedure for Test Run Requirements which establishes how communication between the fitter and driver as to the defects on the Locomotive is managed, alongside potential failure symptoms, and a set of instructions on what to do in the event of failure. To reflect this Freightliner's Cab Pass policy has been updated to include test runs and Freightliner Engineering have issued controlled cab passes to be authorised once staff have been briefed on this policy.*

*We have also amended all relevant training to include updated information on the acceleration and braking characteristics of running a Light Engine which is also included as part of the October 2024 safety brief. This also now forms part of the out of course scenario training sessions that are provided to drivers, which also confirms driver knowledge by form of assessments at the end of the training module. Records of these assessments are kept within our electronic learning system.*

*Freightliner's assessment of train drivers assesses whether they have the knowledge and understanding of the maximum operating speeds of all traction they are competent to drive, and applicable reductions in speed when being driven as a light engine. This also includes the fundamentals of braking systems and how the overall mass and braking forces of different configurations effect acceleration and stopping distances.*

8. On 21 February 2025 Freightliner provided the following update:

*As part of an internal review after the Stafford SPAD, we have updated our light locomotive risk assessment to include all associated risks. The updated risk assessment includes reference to the changes made to our test run procedure and our driving cab protocols guidance. The review was undertaken with our internal operations training team to ensure the risk assessment takes into consideration current RSSB rule book modules applicable to the task of driving light locomotives. The risk assessment has a yearly review date set for January each year so that any changes to the rule book published in the December updates that may impact the risk assessment will be captured in the review.*

## **Recommendation 2**

*The intent of this recommendation is to improve the ability of Freightliner's train drivers to effectively deal with out-of-course scenarios.*

Freightliner should review how it trains and assesses train drivers to effectively and safely manage abnormal, out-of-course and potentially stressful situations. This review should consider whether the use of training simulations, or other means, has the potential to better equip train drivers to safely manage such situations. Freightliner should introduce any necessary changes identified by this review.

This recommendation may also be applicable to other freight operating companies.

## ORR decision

9. Freightliner has implemented a programme of non-technical skills (NTS) training for its drivers and managers with the aim of improving the resilience of drivers when faced with out of course scenarios. Freightliner confirmed that the strategy to embed NTS would include scenario-based simulations of out course events for existing staff, as well as new trainees, with a plan to integrate this process with the company quality management system.
10. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Freightliner has:
  - taken the recommendation into consideration; and
  - has taken action to close it.

**Status: Closed.**

## Information in support of ORR decision

11. Freightliner provided the following initial response dated 2 October 2024:

*Following the incident, Freightliner has implemented a programme of Non-Technical Skills (NTS) training to all drivers and managers within the business. Part of this course covers Stress, Pressure, and Making Effective Decisions. This forms part of Freightliner's long-term strategy for imbedding NTS into the day to day working and routine assessment cycles. In addition to this, our future safety briefs will include information around out of course scenarios and NTS topics in more detail to support the operational community. Out of course scenarios have also been implemented as part of Freightliner's operational training for newly recruited train drivers, using scenario-based simulations to ensure drivers are fully equipped with the knowledge and processes to deal with these situations.*

*In addition, we are updating our Professional Driving Policy and are creating a handbook which covers sections for out of course events and failures.*

12. On 21 February 2025 Freightliner provided the following update:

*Freightliner currently have a blended assessment method which allows assessors to simulate events and scenarios for out of course events and other situations for which observation does not generally allow. This is also supplemented by the use of the safety briefs in which we use scenario-based events and situations to discuss and work through in group exercises. In the longer term, a full refresh of the CMS and associated assessment criteria is being carried out in 2025. This project will be used to edit the criteria and link them to specific Non-Technical Skills where applicable.*