

Oliver Stewart
RAIB Recommendation Handling Manager



4 June 2025

Mr Andy Lewis
Deputy Chief Inspector of Rail Accidents

Dear Andy,

**RAIB Report: Member of staff struck by a train at St Philips Marsh depot,
Bristol on 26 September 2023**

I write to report¹ on the consideration given and action taken in respect of the recommendations addressed to ORR in the above report, published on 11 July 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 '**Open**'.

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

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

Initial consideration by ORR

1. Both recommendations were addressed to ORR when the report was published on 11 July 2024.
2. After considering the recommendations ORR passed both recommendations to Great Western Railway 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 TOCs, FOCs, tramways and metro systems as it was concluded that 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 to reduce the risk of staff at Great Western Railway, who hold a personal track safety competency, from being struck by a train when working and walking in its depots.

Great Western Railway should review the training and assessment it provides for shunters and other staff from its engineering function for gaining or recertifying their personal track safety competency, to ensure that these staff receive an appropriate level of information and assessment about working and walking on depots. This review should specifically consider the training and assessment already provided to Great Western Railway staff working in its operations function who hold personal track safety competency.

This recommendation may also apply to other duty holders who are responsible for shunters working in depots, yards and sidings

ORR decision

5. Great Western Railway (GWR) has provided evidence of a review of the training and assessment of depot staff who hold the personal track safety competence (PTS). We are monitoring the embedment and effectiveness of the new and revised processes..
6. In following up this recommendation, we are discussing with GWR how visitors to depots are managed and instructed, although this is not strictly linked to the recommendation and is being followed up as part of audit work concerning authorised walking routes connected to rec 2.
7. 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

- is taking action to close it.

Status: Open.

Information in support of ORR decision

8. On 4 October 2024 Great Western Railway provided the following initial response:

GWR have created a new role of Operations Standards Manager Depots and Sidings, for which the successful applicant started in the role at the end August 2024. They have been tasked with reviewing the Personal Track Safety procedure (IMS-0803-00), with one of the outputs being to put in place an updated training and on-going assessment package for colleagues who work in the engineering function and who require Depot Track Safety. This review has now commenced and is being conducted in conjunction with the engineering and operations functions to ensure that any proposed changes are fit for purpose and able to be delivered. The proposed timeline to deliver this is as follows:

- *October 31st 2024 – Completion of the scoping of the outline proposal for training and on-going assessment, for engineering functional approval.*
- *December 31st 2024 – Completion of the proposed training package in conjunction with engineering trainers, based on a modular approach to ensure that colleagues get the training they require based on their role, and location.*
- *January 31st 2025 – Completion of the method and contents for assessing on-going competence for those already employed within the engineering function.*
- *Whilst these actions are being progressed to the timescales noted above, the PTS procedure (IMS-0803) will updated and be put through the internal peer review/sign-off process to reflect the changes being made.*

9. On 28 February 2025 Great Western Railway provided the following update:

As per the recommendation made by RAIB, a review has taken place of the training and assessment of shunters and other engineering grades who walk around depots, in relation to personal track safety. This has been benchmarked against, and where possible aligned with that offered to other operational grades (e.g. drivers), for whom the training package prior to the incident was deemed more robust. Where drivers will continue to be certified in Personal Track Safety (PTS), allowing them to walk in traffic on the operational mainline as well as in depots, Depot Track Safety (DTS) for engineering colleagues has been the focus of our efforts to shore up our safety processes.

The review has considered both the generic risks of walking on depots as well as location specific risks. This has led to a modular training and assessment approach for DTS which covers both these topics, introducing an element of “route competence” for colleagues who need to walk around depots. This supports an underlying principle that not all depots are the same and that specific hazards will exist walking on certain depots or walking routes. As a result, a colleague for example may be competent to walk around Reading Train Care Depot but not competent to walk around St Philips Marsh Depot.

The review has also sought to better define what is considered a “walking route” on a GWR depot, and who can walk there based on the training that they have had. It is determined that where walking routes are provided, they should minimise the potential for conflict between people and trains, and where tracks need to be crossed this is done at a clear designated crossing point. Using a walking route does not require PTS or DTS competence.

Within depots, we have sought to define “walkways”. These are marked and established areas that allow colleagues to walk around the depot for operational reasons, for example to access or walk around an engineering facility or a set of hand points. To walk on a walkway colleagues must be trained and assessed in PTS (with associated traincrew route knowledge) or DTS with associated location specific competence (e.g. a Maintenance Technician). A PTS holder who does not hold traincrew route knowledge or location specific DTS competence (e.g. a visiting manager) must attend a depot induction and be accompanied in these areas. Walking in any other area of the depot on or near the operational railway must only be done in the course of a colleague’s duties and they must be trained in PTS with associated route knowledge (e.g. a shunter or driver).

All the relevant training packages have been reviewed to give the suitable level of training for each applicable role.

Assessment of engineering colleagues holding DTS will, over time, be migrated from an outdated paper-based system to the existing electronic CMS system (Assesstech ACMS) in line with other operational grades. Assessment will be based on fixed criteria and again be split to cover generic rules and instructions as well as location specific information.

In support of these changes the following has either occurred or is in progress:

- Head of Operations, Head of Operations Standards, and Engineering Training and Competence Manager have been involved in agreeing the outline of the new process and producing supporting change paper. This has been reviewed and endorsed by GWR Safety Validation Panel.*
- All relevant training packages have been reviewed and enhanced where required.*
- Migration of engineering colleagues on to ACMS will take place as each colleague ends their current competence cycle for either DTS/PTS. Once migrated engineering colleagues will maintain a two-year competence cycle due to the nature of work in depots and their locations.*
- Competency criteria to enable engineering colleagues to be suitably assessed on ACMS have been developed, and are in the process of being set up by*

AssessTech. Once this is completed, the two-year assessment schedules will be set up.

- *SMS-0803-00 “Operational Railway Safety” is progressing through peer review and implementation process to reflect changes.*
- *ENG-0290-00 “DTS Training” has been reviewed and updated and will be reviewed again once SMS-0803-00 is published.*
- *Depot inductions have been reviewed and a further review will be conducted to ensure compatibility with new approach once SMS-0803 is published.*
- *Depot staff route risk assessments published.*

It is also of note that the process in SMS-0803-00 would also cover designated person (DP) and Control of site safety (COSS) training.

It will take some time to migrate some 700+ engineering colleagues on to ACMS. This will be done as their current competency elapses as if all done in one go this would create an unsustainable workload at the same time in subsequent years to recertify everyone at one time.

Bringing the engineering colleagues on to the electronic competence management system will take place in two phases. Firstly, collating all the information required and adding it to the ‘back end’ of the database. Individual colleagues will then be brought forward to the front end of the system as they reach the end of their current two-year PTS competence cycle.

Recommendation 2

The intent of this recommendation is to manage the risk of staff being struck by a train when using authorised walking routes and walkways on depots.

Great Western Railway should review the authorised walking routes and walkways on all its depots where staff that hold a personal track safety competency can walk, and identify the places where staff using such walking routes or walkways might be required to walk foul of a train’s path. Using the results of this review, Great Western Railway should:

- a. assess the risk to staff who might walk in these areas, with specific reference to the hazard of being struck by a train
- b. understand the factors that might affect the level of risk in these locations, for example, where there is limited clearance or where the types of rolling stock that use the depot have differing fields of view from the driving position
- c. identify what controls can be put in place to reduce this risk to a level that is as low as is reasonably practicable
- d. implement the identified control measures, including appropriate briefing or training to the staff affected ds of view from the driving position

ORR decision

10. GWR has conducted a review of authorised walking routes and walkways, considering location specific factors. Our assessment of the review of authorised walking routes and walkways at St Philips Marsh depot identified areas where further enquiries are required to assess compliance. These further enquiries relate to the sufficiency of the risk assessment undertaken, and whether there is sufficient separation of people and moving trains. We are following up with GWR.

11. 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
- is taking action to close it.

Status: Open.

Information in support of ORR decision

12. On 4 October 2024 Great Western Railway provided the following initial response:

The Operations Standards Manager for Depots and Sidings (new role as referenced above) will be reviewing and risk assessing all of the authorised walking routes and walkways on GWR depots and sidings with the intention of producing a standardised document which is easily understandable for those who require it. A core part of this will be to highlight those areas where a person may be required to walk foul of a train's path, although of course the intention would be to eliminate this as a method of work where possible, taking account of the factors that would affect the level of risk. This review will take into account the different types of Depot Protection Systems (DPS) that are in use on GWR depots, ensuring that the training and on-going assessment includes the information required for a person walking in such an area being aware of how the DPS works, and what additional actions they need to take over and above relying on the DPS alone.

This piece of work will be done in conjunction with the actions being taken for recommendation 1, as the modular approach which we intend to take will include location-specific information on walking routes and risks arising from the nature of work at the location. This will also take account of work which has been started to reach out to other railway operators to glean best practice on depot/yard safety, working practices for example.

This action will be completed by January 31st 2025.

13. On 28 February 2025 Great Western Railway provided the following update:

As per the recommendation made by RAIB, we have assessed the areas of depots where there is a hazard of colleagues being struck by a train by completing depot route risk tours. The tours involved colleagues from an engineering and operational background.

At maintenance depots (Reading TCD, St Philips Marsh, Laira, and Longrock) specific focus was placed on where trains enter or exit buildings.

The tours considered factors which might affect risk at different locations were identified. These included the following:

- Poor signage.*
- Areas of limited clearance.*
- Areas where equipment needed moving to improve clearance.*
- Areas where equipment or infrastructure change has encouraged colleagues to walk in areas foul of train movements.*
- Walkways which took you to areas of limited clearance.*
- Risk of walking through wash plants without permission when trains are moving.*
- Walkways which are not fit for purpose and give risks of slips trips and falls.*
- Walkways which are too close to the front of sets*
- Locations where barriers could be installed to stop inadvertently moving into an area where trains could be moving.*

Where hazards were identified different controls have been considered to reduce the risk to as low as practicable, for example:

- Moving or removing infrastructure to improve access to areas where colleagues work near train movements (location specific).*
- Improving signage, paint on floors or updated signage (location specific).*
- Residual hazards included in newly produced route risk assessment papers (published).*
- Updated depot inductions to include residual hazards (published).*
- Routine safety tours of depots by engineering competence management team (ongoing).*
- Depot staff route risk assessment developed to take account of residual hazards (published).*
- Depot visits by Ops standards to validate location specific actions (ongoing).*
- Walking routes/walkways maps have gone through a process of standardisation of look and feel. This has now been completed, although these are under constant review to ensure accuracy.*
- Maps to be held in each depot's operating instructions and on GWR's interactive route map held on AssessBook, an online learning portal. (In process of being published).*

Ongoing depot tours will be completed as part of our established Depot Operations Improvement Groups (DOIG) to identify any changes or new hazard which could increase the likelihood of a colleague coming into conflict with train movements. Sidings, which do not have a DOIG (e.g. Oxford Up carriage sidings, West Ealing and Swindon Cocklebury) will be covered by the planned general inspection regime. These locations do not have areas where GWR trains enter and exit buildings. All are modern facilities built with distinct concrete areas between stabling lines.