

Oliver Stewart
RAIB Recommendation Handling Manager



6 August 2025

Mr Andy Lewis
Deputy Chief Inspector of Rail Accidents

Dear Andy,

RAIB Report: Collision at Aviemore station on the Strathspey railway on 29 September 2023

I write to report¹ on the consideration given and action taken in respect of the recommendation addressed to ORR in the above report, published on 5 September 2024.

The annex to this letter provides details of actions taken in response to the recommendation and the status decided by ORR. The status of recommendation 1 is **'Open'**.

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

We will publish this response on the ORR website.

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. The recommendation in the RAIB report was addressed to ORR when the report was published on 5 September 2024.
2. After considering the recommendation ORR passed the recommendation to Strathspey Railway Company Limited asking them to consider and where appropriate act upon them and advise ORR of its conclusions. The consideration given to the recommendation is included below.

Recommendation 1

The intent of this recommendation is to ensure that the risk incurred by abnormal, but foreseeable, operations at the Strathspey Railway are effectively identified, assessed and mitigated.

Strathspey Railway Company should review the implementation of its new standard operating procedure to manage special events and special train planning to ensure it is effectively identifying, assessing and mitigating the risks associated with such events. Strathspey Railway Company should develop and implement a timebound plan to make any changes to its organisation, processes, rules and procedures identified as appropriate following this review

ORR decision

3. In January 2024 Strathspey Railway Company (SRC) introduced a new Standard Operating Procedure (SOP) to manage Special Events and Special Trains. SRC explained that with a greater focus on timetabled services in 2024, there was limited opportunity to monitor the effectiveness of the new SOP for special event and trains. We have therefore requested an update from SRC explaining the effectiveness of the new SOP once the 2025 operating season has been completed.

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

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

Status: Open.

Information in support of ORR decision

5. On 6 December 2024 Strathspey Railway Company Limited provided the following initial response:

The implementation of a new Standard Operating Procedure to manage Special Events and Special Trains was first published in January 2024 has been applied where required to manage applicable events. However, the core focus for the Railway in the 2024 season has been to concentrate on safe and reliable operation of timetabled services. This has included the establishment of a revised working relationship with Belmond Royal Scotsman, which due to the high volume

of visits, is regarded as a 'Timetabled Operation' rather than a 'Special Train'. Consequently, the pathing of this train features in the Strathspey Working Timetable. The operation of the Royal Scotsman also has it's own dedicated Standard Operating Procedure which was also updated in consultation with Train Operator (GB Railfreight) prior to resumption of traffic in early April 2024 and the train has successfully visited the Strathspey Railway on over 50 occasions during 2024. This operation and the associated Royal Scotsman Standard Operating Procedure has also been under continuous monitoring and review during the course of the season.

Only a very small number of 'Special Events' took place in 2024. Filming work associated with a well-known TV series and a visiting Railtour were the only 'Special Events' to which the procedure was applied to identify, assess and implement control measures where required. We therefore have limited evidence of the application of our revised process to a high profile widely advertised Heritage Railway 'Gala' type event typically spread over a Bank Holiday Weekend.

By way of supporting information (and not strictly part of the formal response to the Recommendation) the intention in the 2025 season is obviously to expand this type of activity and, for example, early discussions are underway for a potential visit by a celebrity Scottish Steam Locomotive. Also, the RAILWAY 200 Special Event Exhibition Train promoters would like to visit the Strathspey Railway in the latter half of the season and we are engaging with the organisers. Clearly, in both cases the Standard Operating Procedure for Special Events and Special Trains would apply.

In terms of the Organisation, the Strathspey Railway (SR) has implemented a fundamental change in the way the Railway is managed with the introduction of a full time General Manager role to undertake the 'Day to Day' management of the operation, the staff (employees and volunteers) and other resources replacing the previous structure where a larger part time SR Company Board undertook that role.

The Timebound Plan to which the SR has been working is :-

- 1. Appointment of General Manager – Completed Early April 2024*
- 2. Establishment of Management Committee to undertake all matters relating to 'Day to Day' Operation of the Railway thereby allowing the SR Company Board to focus on more strategic and oversight issues – Completed on 24th April 2024.*
- 3. Changes to Processes and Procedures – this has been ongoing throughout the Season beginning in January 2024. A Pre 2024 Season Briefing to Staff was Completed on 16th March 2024.*
- 4. Other new Committees / Working Groups have been established to support the operation of the Railway covering topics such as Operations, Safety Management, Competence Assurance and HOPS. All are aiming to have prepared new material for cascade at our Annual 'Town Hall' briefing to staff which is currently Planned for Saturday 22nd March 2025 as part of the preparation for the 2025 Season which commences on Saturday 29th March.*

5. A Rule Book Update has a target of a Draft by 31st January 2025 and Re-issue by end February 2025 and Briefing of Changes / Formal Implementation in March 2025.

On the matter of Cab Discipline referenced in Paragraph 117 of the Report, the SR has implemented a revised Cab Pass Standard Operating Procedure and we are satisfied, on review of the application of the procedure, that the revised process is delivering compliance with our Rule Book in respect of controlling access to the Cab by other persons who are not rostered footplate crew.

6. On 7 January 2025 ORR wrote to Strathspey Railway Company Limited as follows:

We note that you have had little opportunity to test the new standard operating procedure since it was introduced as there were only a limited number of applicable events in 2024. As there are likely to be a greater number of applicable events in 2025, it seems a more appropriate time to review the implementation of the new procedure. Please could you therefore review the implementation of the procedure and provide ORR with outcome by the end of December 2025.

ORR is legally required to provide RAIB with a response to a recommendation within a year of publication, so 4 September 2025 in this case. We will explain in that letter that implementation of the recommendation is ongoing, and we will provide an update in 2026, once the Strathspey Railway Company Ltd have had suitable opportunity to review the implementation of the new standard operating procedure.