

Oliver Stewart
RAIB Recommendation Handling Manager



13 October 2025

Mr Andy Lewis
Deputy Chief Inspector of Rail Accidents

Dear Andy,

**RAIB Report: Collision between a road-rail vehicle and a trolley
near Brading on 22 November 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 24 October 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 - 3 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,

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

Initial consideration by ORR

1. All 3 recommendations were addressed to ORR when the report was published on 24 October 2024.
2. After considering the recommendations ORR passed all 3 recommendations to South 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. 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 South Western Railway to review how it manages safety during infrastructure work on the Island Line.

South Western Railway should undertake a risk-based review of its arrangements for:

- a) planning and management arrangements for possessions, work sites and sites of work
- b) the movement of on-track plant, including risks relating to gradients and low wheel/rail adhesion.

This should include the applicability of the provisions of GERT8000 (the Rule Book) for managing Island Line infrastructure works.

Following this review, South Western Railway should develop a timebound plan to make any appropriate changes identified to standards, processes and its organisational structure

ORR decision

4. South Western Railway (SWR) has made changes to planning and management arrangements for possessions and the movement of on-track plant consistent with the recommendation. SWR has not yet delivered a process flow chart linking the new procedures together. We will consider the case for closure when this is in place.
5. To address part b of the recommendation, SWR has amended its planning process to prohibit work taking place down gradient from where on-track plant is operating.
6. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, SWR has:
 - taken the recommendation into consideration; and
 - is taking action to address it.

Status: Open.

Information in support of ORR decision

7. On 5 February 2025 South Western Railway provided the following initial response:

As part of the risk assessment of ES/PICOP duties and responsibilities with moving machines/vehicles in a Possession or Worksite, a number of new control measures have been implemented for the use of OTP, including:

- *The use of fixed physical points marked with OTP specific stop boards as the limits for sites of works within the worksites in which OTP is to be used*
- *The prohibition of staffed sites of works within the worksite to be set up down gradient of an OTP worksite unless additional runaway mitigation measures are in place*
- *The prohibition of OTP movements if a COSS is signed in with the PICOP/Engineering Supervisor until movement has been completed.*
- *Machine speeds may not be increased above 5 mph without management permission, and if given no other COSS will be authorized to work*
- *Improved site briefings with particular emphasis on limits of Sites of works within worksites and actions in response to an accident or incident, along with the recording of such briefings.*
- *Mandatory recorded radio communication, through the CAPCOM radio system is now mandatory with all RRVs machine controllers when operating within worksites.*
- *Implemented signature briefings from ES to COSS/Machine Controllers introduced to ensure briefings are understood and signed.*

Rule Book requirements relevant to Island Line infrastructure works relate to the competence of the individuals involved. This is reviewed at the planning stage and checked through the SENTINEL system when staff sign in.

These improvements have already been implemented. New process flow documents are being produced to clearly articulate them, and are expected to be completed within six weeks. A new suite of policy and procedure documents to cover these processes are required and will be completed within six months.

Although not conceived in response to this incident, SWR has created a track engineer position to provide professional infrastructure maintenance guidance and oversight, because this has been determined as a significant weakness in the current structure. Interviews were held in late 2024, however suitably qualified and experienced candidates have been difficult to come by and the one individual offered the role has withdrawn from consideration. As a result SWR is in discussion with NR to fill the role on a secondment basis. This position will provide the necessary competence independent of delivery to ensure that infrastructure policies and procedures are for purpose and that they are being complied with.

8. On 5 September 2025 South Western Railway provided the following update:

Following this review, South Western Railway should develop a timebound plan to make any appropriate changes identified to standards, processes and its organisational structure (paragraphs 123.a.i, 124.a, 124.b).

As part of the risk assessment of ES/PICOP duties and responsibilities with moving machines/vehicles in a Possession or Worksite, a number of new control measures have been implemented for the use of OTP, including:

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Recommendation 2

The intent of this recommendation is for South Western Railway to review its assurance processes.

South Western Railway should review assurance processes to understand if they are effective at detecting informal, non-compliant and unsafe practices during infrastructure work on the Island Line.

Following this review, South Western Railway should develop a timebound plan to make any appropriate changes identified to standards, processes and its organisational structure

ORR decision

9. Having considered the issue of assurance on the island line in response to this incident, SWR decided to recruit an Assurance Manager specifically for the Island Line. The recruitment process is expected to be completed by December 2025.

10. SWR has also commissioned an independent review of assurance activity on the island line. The findings of the review and action taken in response will inform our consideration of closure of the recommendation.

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

- taken the recommendation into consideration; and
- is taking action to address it.

Status: Open.

Information in support of ORR decision

12. On 5 February 2025 South Western Railway provided the following initial response:

SWR has looked at what independent assurance takes place on the island line. As part of this it was identified that there would be merit in implementing a new Island Line assurance manager position. It is proposed that this new position reports into the Senior Assurance Manager within SWR. The intention of this post will help to ensure there is an element of independent assurance activities taking place, on a controlled and periodic basis on the island line. This will be factored into SWRs assurance plan for the 25/26 year.

In addition to this in January 2025, SWR commissioned an independent organisation (QSS) to come in and undertake an independent assurance activity on the island line. The scope around this work was to specifically understand the arrangements for planning, managing, supervising and auditing possessions, work sites and sites of work on the Island Line. Once completed this activity will help to understand how the mitigations which were implemented post incident are now embedded in the local teams on the island line.

13. On 5 September 2025 South Western Railway provided the following update:

Fleet Engineering department has a new position of Track Engineer, which will provide technical oversight of all infrastructure maintenance activities undertaken by and on behalf of SWR, including the Island Line. Recruitment took place in Dec 24, but there was a shortage of suitable candidates, and the one offered the position never responded. SWR are now working with NR Wessex to fill the position on a secondment basis. This will be an interim arrangement until the SWR - NR Wessex integration.

The Safety department is creating an additional assurance position with specific responsibility for the Island Line. This is currently going through the board approval process and requires DfT sign off.

Recommendation 3

The intent of this recommendation is for South Western Railway to provide its infrastructure maintenance staff and contractors with accurate information about its infrastructure.

South Western Railway should establish the accuracy and completeness of gradient information used for planning possession works on its infrastructure so that the risks associated with runaways and low adhesion can be understood and managed. The revised information should be provided to Network Rail Technical Authority to enable industry reference information to be updated

ORR decision

14. SWR has collated existing gradient information for the Island Line and provided it to Network Rail and contractors as required. SWR reported that a gradient survey of the Island Line was being carried out with Network Rail, but it has not yet been reported as completed.

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

- taken the recommendation into consideration; and
- is taking action to address it.

Status: Open.

Information in support of ORR decision

16. On 5 February 2025 South Western Railway provided the following initial response:

This information has been collected and collated. It will be sent to the relevant part of NR when they have been identified. The implementation of the control measures described above eliminate much of the risk of the use of OTP, and sufficient information is extant to allow these control measures to be implemented.

17. On 27 February 2025 ORR asked South Western Railway what assurance they can provide that accurate gradient information is being recorded and it is available to the people (SWR staff and contractors) who need it. South Western Railway responded on 17 March 2025 as follows:

In regard to recommendation 3, gradient information is provided to interested parties in the form of Five Mile Diagrams. In addition to this a survey is currently being undertaken over the Island Line route (with the assistance of Network Rail), which will help enable us to create a more accurate gradient profile.

18. On 5 September 2025 South Western Railway provided the following update:

This information has been collected and collated. It will be sent to the relevant part of NR when they have been identified. The implementation of the control measures described above eliminate much of the risk of the use of OTP, and sufficient information is extant to allow these control measures to be implemented.