DAPR Proposal for Change Consultation April 2026 – Proposals for Amendment for Approval

Table of Respondents

Proposal reference Number:	DAB P391	DAB P392	DAB P394	DAB P395	NR P242	NR P243	NR P244
Chiltern Railways*	☑	☑	☑	☑	☑	☑	☑
DB Cargo						☑	
DRS						☑	☑
GBRf	☑					☑	☑
London NorthWestern and West Midlands Trains*	☑	☑	☑	☑	☑	☑	☑
Network Rail	☑	☑	☑	☑	☑	☑	☑
Northern Trains Ltd*	☑	☑	☑	☑	☑	☑	☑
Scotrail*	☑	☑	☑	☑	☑	☑	☑
TransPennine Express*	☑	☑	☑	☑	☑	☑	☑

*Responded collectively through DAMG forum

Key to "Exact details of the change proposed" field

- *Black Text in italics* is explanatory comment only which will not be incorporated within DAPR as part of any amendment.
- Text in standard black font represents pre-existing DAPR text (included for context)
- ~~Struck-through black text~~ represents pre-existing DAPR text that is to be removed as part of the Proposal for Change
- Red Text represents additional/amended text proposed within the original Proposal for Change, as submitted to industry for consultation.
- ~~Struck-through red text~~ represents text that was part of the original Proposal for Change submission but which the Board are have opted to exclude from the final proposal (again, this is shown for context only as such).
- Blue text represents additional/amended text to the proposal that has been added by the Board based on industry consultation feedback.

Note that, as and when proposed changes are approved, all revised text will be displayed in the document in red and all text to be removed will simply be deleted (i.e. use will not be made of blue font or strikethroughs within DAPR itself). Such formatting has been used in this document purely to highlight and track the changes that have been applied to proposals in consequence of the consultation and review process for ORR's benefit.

Originators Reference Code / No [For DAB input]	**DAB P391**
Name of the original sponsoring organisation(s)/ point of contact	Delay Attribution Board [redacted] [redacted]
Exact details of the change proposed	*Revise the explanatory note defining "Booked Route" in DAPR Section J3 from:* ~~Note: "Booked route" is the line of route which the train is scheduled to run over and/or the platform at the stations which the train is scheduled to call at. It is normally expected that a member of train crew will sign fast and slow lines and passing loops where route cleared. However, scenarios exist at more complex locations where crews will only sign specific lines and platform numbers.~~ *To:* Note: "Booked route" refers to the specific running line that a train is scheduled to run over and the platforms at the stations which it is scheduled to call at. The driver of a train is expected to be able to take the train via this specific route and any alternate routes which ~~have previously been documented as recognised diversionary routes~~ are documented as an agreed diversionary route for the service pattern.
Reason for the change	Although factually correct, the existing DAPR explanation of the term "Booked Route" appears to have caused confusion within the attribution process. Specifically, the comment that *"scenarios exist at more complex locations where crews will only sign specific lines and platform numbers"* has been incorrectly taken to mean that a lack of route knowledge for a given approach road and/or platform which is not part of a booked route must indicate a shortcoming in driver knowledge (and therefore any associated delay must be a TOC/FOC-responsibility matter). This was never the intended meaning of this paragraph – in practice it is recognised that, particularly at major station terminals, there will not be complete consistency in which platforms and approach roads drivers working for a given operator will sign.

	Rather than attempting to further develop and/or add additional caveats to the existing explanation, DAB is of the view that it would benefit from simplification to the effect that the only routes a driver is required to sign are the scheduled "booked route" and anything that is classed as a recognised diversionary route. It is suggested that this is the only clarification a Delay Attributor requires to carry out accurate attribution relating to this subject.

1. **Do you perceive that this proposal will have a wider impact (including commercial impact) on your business or the business of any other industry parties?**

If yes;
For Network Rail – Please provide an impact assessment indicating the impact of the proposal on all affected industry parties.
For Train Operator – Please provide an impact assessment on your own business.

No

2. **If you have provided an impact assessment as per question 1 above, please provide a proposed solution to neutralise any financial effect of the proposal.**

N/A

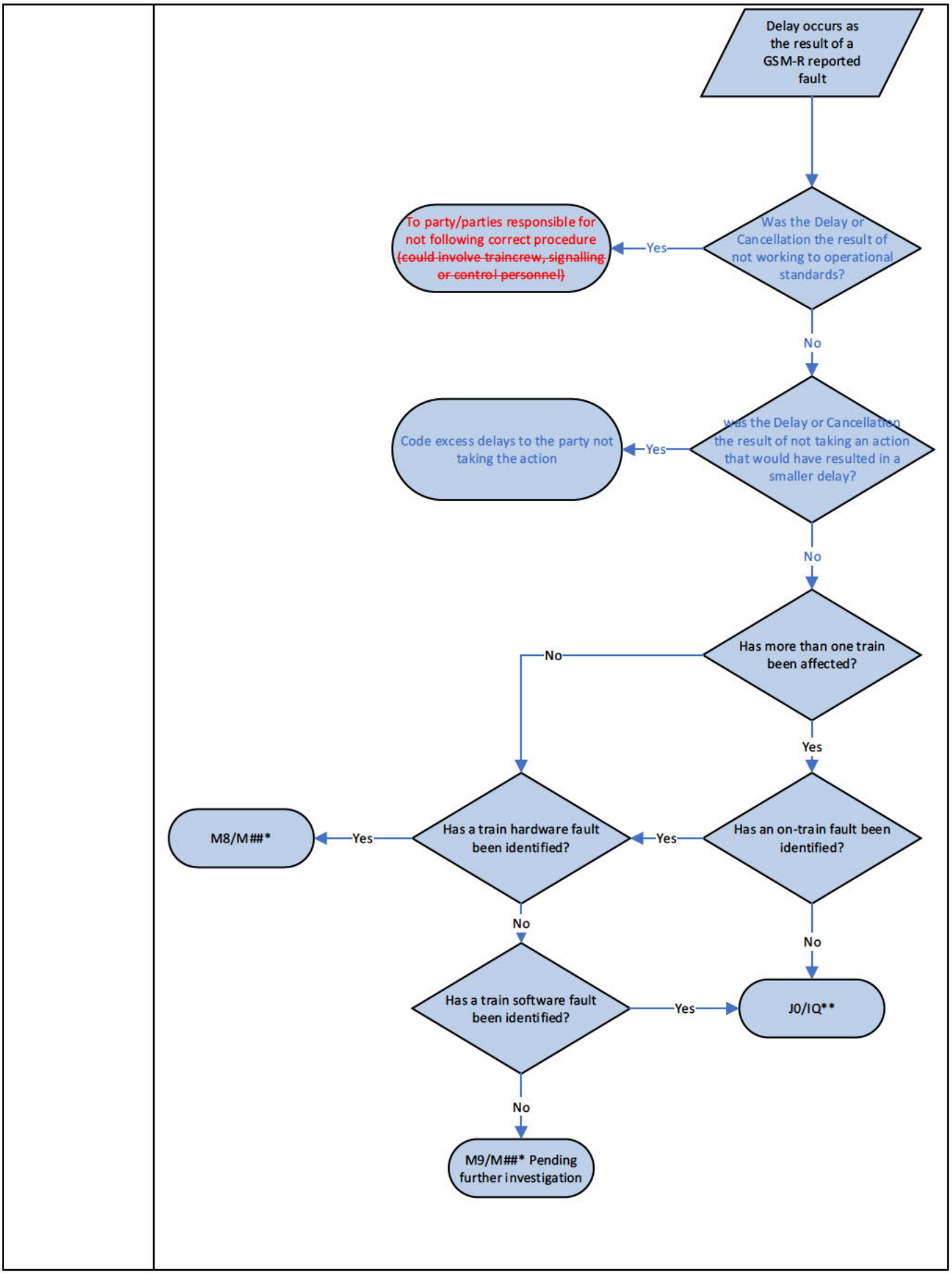
Industry Responses

GBRf	**C. NO, UNLESS SUGGESTED AMENDMENT IS APPLIED** [Requested amendment in italics below] *Note: "Booked route" refers to the specific running line that a train is scheduled to run over and the platforms at the stations which it is scheduled to call at. The driver of a train is expected to be able to take the train via this specific route and any alternate routes which ~~have previously been~~ are documented as ~~recognised~~ an agreed diversionary route for the service pattern.* Replace the words "have previously been" and replace with "are", should reflect the current agreed position rather than referring to something that had been agreed previously but has since been superceded. Replace the word "recognised" with "agreed" to differentiate between a recognised route and an agreed one (for example a line blockage at Aviemore would require diversions via Aberdeen which is a recognised route but one for which it may not be a diversion the operator has agreed to in a contingency plan, this is very different to a diversion via Northampton vice Weedon on the WCML where the majority of operators have drivers that sign both as it is both a recognised and very often agreed to diversion. Remove the 's' from routes to simply rear route
Network Rail	**A. YES, PROPOSAL IS AGREED WITH AS WRITTEN.**
DAMG	**C, NO, UNLESS SUGGESTED AMENDMENT IS APPLIED** Based on the logic for the reason for change, the wording used regarding booked and alternate route is still open to misinterpretation and misapplication and fails to cover crew route knowledge, traction route clearance and route availability. replace *Note: "Booked route" refers to the specific running line that a train is scheduled to run over and the platforms at the stations which it is scheduled to call at. The driver of a train is expected to be able to take the train via this specific route and any alternate routes which have previously been documented as recognised diversionary routes for the service pattern.* With *Note: "Booked route" refers to the specific running line(s), junction(s) and station platform(s) recorded within the Applicable Schedule for that train.* *The crew shall be able to take the train via this specific route, and during disruption via alternative/diversionary routes as recorded within current agreed contingency plans.*

Secretary Note	Accepted that both the requested GBRf and DAMG revisions could potentially improve clarity. However, they cannot both be applied. So a decision will be needed on which (if either) is preferable. Only query on the DAMG wording is that the capitalisation of “Applicable Schedule” could be taken to imply that the definition cannot apply to Non-Applicable moves, But presumably a Non-Applicable schedule can still be validated (and therefore “Booked”)?

Board Consultation	Noting that GBRf and DAMG had proposed separate amendments to the consulted wording, and that it would be impposible to apply both of these, the Board agreed to apply the amendment requested by GBRf. This decision was taken principally on the basis that the reference to an “Applicable Schedule” in the DAMG wording (and, therefore, a potential incorrect inference that only trains running with an Applicable Timetable schedule can be considered to have a “booked route”) could be considered misleading. The GBRf wording, by contrast, was considered to have added precision without detracting from the intended meeaing of the entry.

Originators Reference Code / No [For DAB input]	**DAB P392**
Name of the original sponsoring organisation(s)/ point of contact	Delay Attribution Board [redacted] [redacted]
Exact details of the change proposed	*Revise Flowchart G5.1 on GSM-R faults to the below (overleaf):*


Delay occurs as the result of a GSM-R reported fault
Was the Delay or Cancellation the result of not working to operational standards?
Yes
To party/parties responsible for not following correct procedure (could involve traincrew, signalling or control personnel)
No
was the Delay or Cancellation the result of not taking an action that would have resulted in a smaller delay?
Yes
Code excess delays to the party not taking the action
No
Has more than one train been affected?
No
Yes
Has an on-train fault been identified?
Yes
Has a train hardware fault been identified?
Yes
M8/M##*
No
Has a train software fault been identified?
Yes
J0/IQ**
No
M9/M##* Pending further investigation

Delete clause G5.2.c (with existing clauses G5.2.d-p renumbered as c-o respectively)

~~c)~~	~~GSM-R fault is reported to Network Rail Infrastructure control~~	~~I0~~	~~Network Rail (IQ**)~~

Also amend G5.2.h and o (which will become G5.2.g and n respectively as a result of the above change) as below

~~h)~~ g)	Cab based GSM-R equipment vandalised	~~VA~~ VB/FZ	Operator of train involved (V##*/F##*)
~~o)~~ n)	GSM-R ~~signal on a train is lost and both parties agree that the investigation is concluded and no cause has been identified (no other trains affected in that section)~~ is not operational as the result of a loss of signal (the cause of which is not known).	J0(zero)	Network Rail (IQ**)

Also add a new scenario G5.2.~~q~~p within the same table, as below:

~~q)~~ p)	Cancellations related to an inability to register GSM-R when system is otherwise connected (noting that a decision not to run a train in this scenario is contrary to operational instructions).	F*/O*/T* - To the party who took the decision to cancel the train.	F***/O***/T***

Reason for the change	Shortcomings with DAPR principles relating to the attribution of delays and, particularly, cancellations associated with faults involving the GSM-R systems were identified in the aftermath of the unprecedented national system fault which occurred in December 2024. In particular, it was observed on that occasion that a large number of cancellations associated with a failure to register trains (even although these were connected to the network) were allocated to delay code J0, in accordance with existing principle G5.2.m. In practice this principle does not reflect that operational instructions make clear that unregistered trains should be deemed fit to proceed once the driver has notified the signaller of the issue. As such, cancellations which occurred in relation to the December failure were

	subsequently identified as not being operationally necessary (albeit delays would have inevitably occurred as a result of multiple drivers attempting to contact signallers in relation to the fault simultaneously, and these would remain the responsibility of Network Rail). DAB believe that responsibility for these cancellations should logically sit with whichever party did not abide by the operational instructions (noting that, on a train-by-train basis, this may have been the driver, the signaller, or a Network Rail/TOC/FOC Control representative. Arrangements are being made to cover this issue with the Board's (informal) "Industry Resolution Guide" on GSM-R failures. However, it is felt that some clarification of the same point is needed in DAPR itself. Specifically, the changes will: • Clarify the flowchart to make clear that, just because a fault with GSM-R exists, this does not absolve associated staff of following correct operational process to circumvent the issue (as the current version could be taken to imply). • Add the new scenario "q" to make the points about individual responsibility for following correct operational process more explicit. Some further changes to the scenarios in Section G5.2 are also being proposed as part of a wider review into the validity of Section G5. Specifically: • Existing clause G5.2.c not only quotes the incorrect delay code for Network Rail-responsibility GSM-R faults (it should refer to J0), the clause does not cover a genuine prime cause. It is believed that this is a legacy entry that was introduced to DAPR/DAG when GSM-R was first in the process of being rolled out and which should have been removed when guidance on GSM-R attribution was subsequently developed and clarified. Other clauses within Section G5.2 cover explicit scenarios explaining when code J0 should and should not be used, rendering Scenario c incorrect and redundant. • The quoted code for vandalism of equipment inside the cab of a passenger train requires correction – Code VB, not VA, is the dedicated code for TOC-responsibility acts of vandalism. • The opportunity has been taken to clarify that Scenario o relates specifically to incidents involving a complete loss of signal and not to more general issues with faults where a cause cannot be identified. Note that the existing references to investigations needing to be complete to apply the principle have been removed. This is partly because any delay needs to be fully investigated before the associated DAPR principle can be applied (i.e. this does not need to be detailed here any more so than in every other DAPR scenario) and partly because the caveat is serving to obscure the true intended meaning of the clause.

3. Do you perceive that this proposal will have a wider impact (including commercial impact) on your business or the business of any other industry parties?

If yes;

For Network Rail – Please provide an impact assessment indicating the impact of the proposal on all affected industry parties.
For Train Operator – Please provide an impact assessment on your own business.

No – For clarification only. With reference to the flowchart change, the GSM-R registration fault is the root cause of cancellation, but the failure of staff to follow the associated prescribed contingencies is the prime cause. It should also be noted that the proposal would only result in allocation of responsibility to the operator if it was one of their representatives who refused to take the train forward. The proposal hopefully makes clear that the principle equally applies to Network Rail representatives (most obviously signallers) who inappropriately prevent a train from running.

It is also emphasised that the 06/12/24 event varied significantly between operators. e.g. Scotrail/NR Scotland were observed to have been considerably less affected than many other operators due to having a better mutual understanding of the procedures to follow in such a scenario. As such, any attempt at recalibration would be problematic as it would not truly reflect the impact on individual operators.

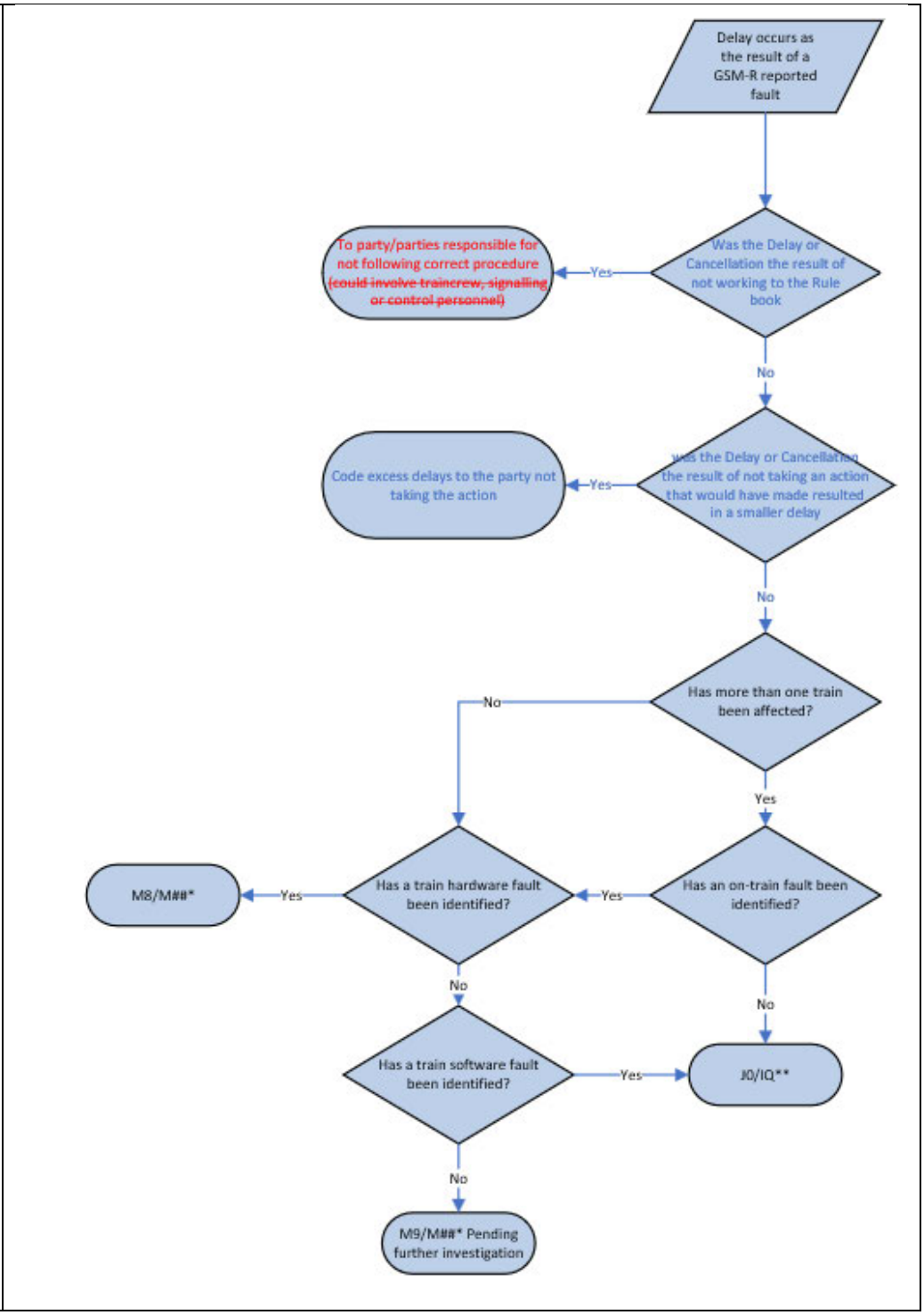
4. **If you have provided an impact assessment as per question 1 above, please provide a proposed solution to neutralise any financial effect of the proposal.**

N/A

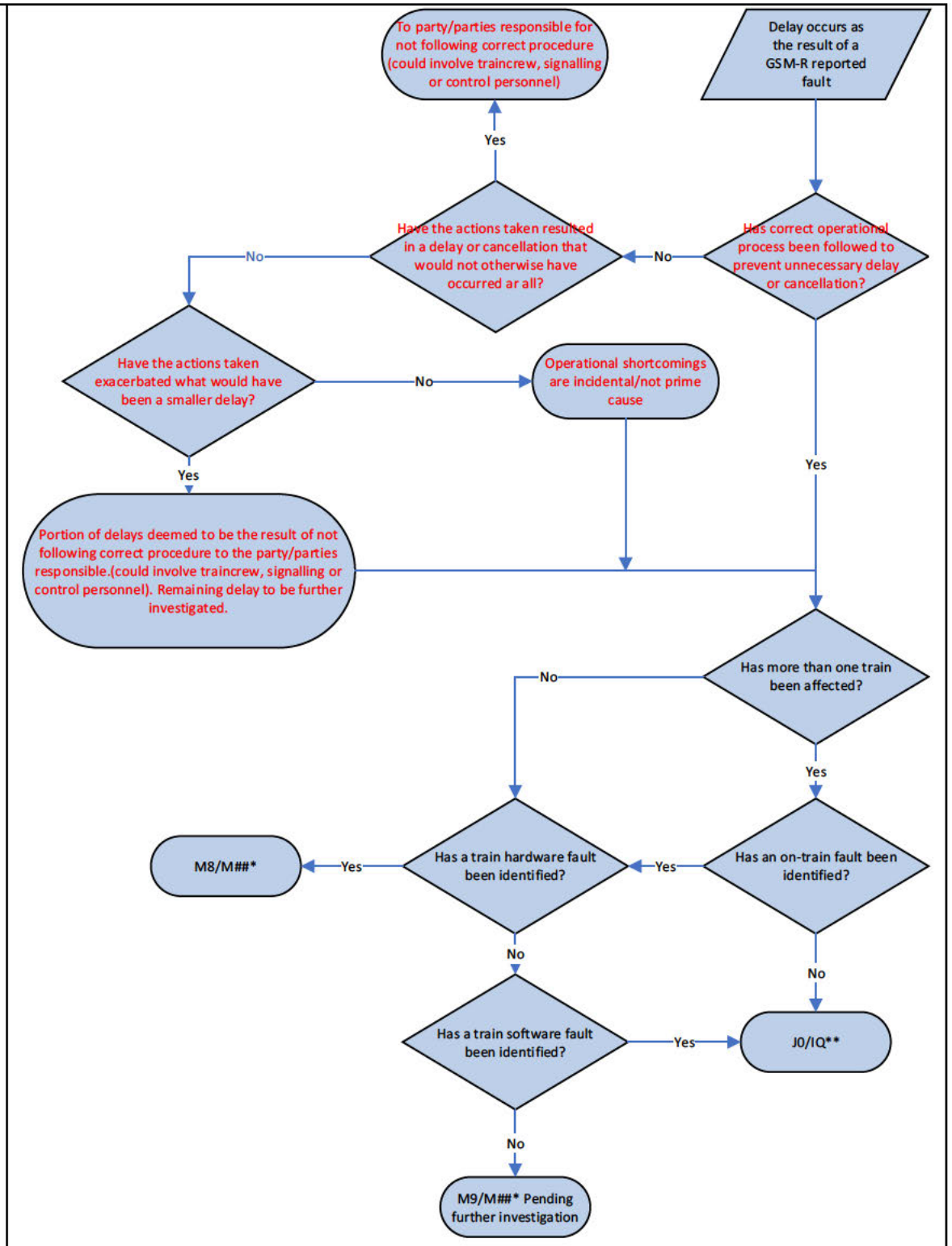
Industry Responses

Network Rail	**C. NO, UNLESS SUGGESTED AMENDMENT IS APPLIED** The new Scenario listed as G5.2.q needs to be renumbered as G5.2.p to account for the renumbering of the other scenarios within G5.2). Otherwise, the scenarios will jump from G5.2.o to G5.2.q.
DAMG	**C. NO, UNLESS SUGGESTED AMENDMENT IS APPLIED** The wording used such as “correct operational process”, assumes that there is one operational process, rather than one per organisation, and that all processes will align Replace new box 1 with “*Was the Delay or Cancellation the result of not working to the Rule book*” *Yes – Code to Party responsible for not following the correct procedure* *No – was the Delay or Cancellation the result of not taking an action that would have made resulted in a smaller delay* *Yes – Code these excess delays to the party not taking the action* *No - …. Has more than one train been affected*

Secretary Note	NR's observation is correct and the proposed new clause G5.2.q should be changed to G5.2.p for continuity. With regard to DAMG's comments on the proposed flowchart changes, a version of how (I think) this would look is shown below (with DAMG's proposed wording in blue for illustrative purposes). Accepted by changing the first question, some simplification/removal of steps becomes possible, but members will need to satisfy themselves that the situation where rulebook principles have been followed but delay still occurs "as the result of not taking an action" is a plausible one (since this question is only raised after it has been established that the Rule Book has been correctly applied).


Delay occurs as the result of a GSM-R reported fault
Was the Delay or Cancellation the result of not working to the Rule book
Yes
To party/parties responsible for not following correct procedure (could involve traincrew, signalling or control personnel)
No
Was the Delay or Cancellation the result of not taking an action that would have made resulted in a smaller delay
Yes
Code excess delays to the party not taking the action
No
Has more than one train been affected?
No
Yes
Has an on-train fault been identified?
Yes
Has a train hardware fault been identified?
Yes
M8/M##*
No
Has a train software fault been identified?
Yes
J0/IQ**
No
M9/M##* Pending further investigation

Board Consultation	The Board firstly agreed that the change in numbering of clause G5.2.q to G5.2.p, as highlighted by Network Rail, was necessary to ensure correct sequential numbering within DAPR and that this correction should be applied. So far as DAMG's comments on the propoased flowchart G5.1 were concerned, members agreed that, even if DAMG's stated reasons for applying a change were not necessarily agreed with, they had highlighted that the flowchart included in the original proposal could be considered as unnecessarily complex and, potentially, even misleading. It was agreed that alternative, simplified flowchart - developed by the Secretary to capture the changes requested by DAMG and included in the "Secretary Note" above - should be applied instead of the flowchart originally included in the proposal. However, two further amendments to the Secretary's redraft were identified as necessary: a) The reference to the "Rule Book" in the first "diamond" decision box was amended to state "operational standards". This was in recognition that not all of the operational standards to be applied in the event of a GSM-R registration failure are contained within the Rule Book. b) The word "made", which appeared spuriously in the second decision diamond as part of the phrase "….would have made resulted in a smaller delay" has been removed. *NB. The flowchart that was originally consulted has been removed from the "Exact details of the change proposed" section of this submission for ease of reading, and is instead replicated on the following page:*


To party/parties responsible for not following correct procedure (could involve traincrew, signalling or control personnel)
Delay occurs as the result of a GSM-R reported fault
Yes
Have the actions taken resulted in a delay or cancellation that would not otherwise have occurred ar all?
No
Has correct operational process been followed to prevent unnecessary delay or cancellation?
No
Have the actions taken exacerbated what would have been a smaller delay?
No
Operational shortcomings are incidental/not prime cause
Yes
Yes
Portion of delays deemed to be the result of not following correct procedure to the party/parties responsible.(could involve traincrew, signalling or control personnel). Remaining delay to be further investigated.
Has more than one train been affected?
No
Yes
M8/M##*
Yes
Has a train hardware fault been identified?
Yes
Has an on-train fault been identified?
No
No
Has a train software fault been identified?
Yes
J0/IQ**
No
M9/M##* Pending further investigation

Originators Reference Code / No [For DAB input]	**DAB P394**
Name of the original sponsoring organisation(s)/ point of contact	[redacted]
Exact details of the change proposed	*Amend Section N4, scenarios d,f,g,h,I,j and o as below (full scenarios table replicated for context).*

N4 Passenger Related Incidents

N4.1 Likely Situations

No.	Circumstances	Delay Code	Incident Attribution
a	Illness or Non-malicious injury to passenger (including delays awaiting ambulances and/or where the access of other passengers to a platform is impacted) but there is nothing to prevent the passage of the train itself	VD	Operator of train involved (V##*)
b	Illness or Non-malicious injury to passenger on a platform which is both preventing the access of passengers to the train and causing an infrastructure restriction to the passage of the train itself.	VD	Joint responsibility (D##*)
c	Illness or Non-malicious injury to passenger where there are no issues with passenger access to the platform and the only reason for delay is that the stricken person has encroached over/fallen off the platform edge or is deemed at risk of doing so (not including falls from a train doorway, which are covered by N.4.1.o)	XA	Network Rail (X##*)
d	Station overtime caused by passenger volumes boarding and	RB	Operator of train

			alighting ~~(no causal incident identified for increased passenger numbers - see notes at foot of table)~~ not in consequence of late running/cancellations or a planned event (e.g. sports fixtures, concerts)		involved (R##*)
		e	Station overtime caused by increased passenger volumes boarding and alighting due to a planned event (e.g. sports fixtures, concerts)	R7	Operator of train involved (R##*)
		f	Station overtime caused by increased passenger volumes boarding and alighting that is due to: That train's own late running or Another identified prior scheduled Responsible Train that was planned to serve the same station and/or on the same line of route but is delayed or cancelled.	YX	Prime Incident causing the train to be late or cancelled
		g	Station overtime caused by increased passenger volumes boarding and alighting due to passenger displacement from another line of route (causal incident can be determined – see notes at foot of table)	Direct Delay to the related Causal Incident	Prime Incident causing the train to be late or cancelled
		h	Station overtime caused by increased passenger volumes boarding and alighting due to passenger displacement from another line of route (causal incident cannot be determined – see notes at foot of table)	RX	Operator of Train involved (R##*)
		i	Overtime caused by persons with reduced mobility joining or alighting	RC/RQ ~~as appropriate~~	Operator of train involved (R##*)
		j	Overtime caused by loading or unloading of bicycles	RR/ RS ~~as appropriate~~	Operator of train involved (R##*)
		k	Disorder/drunks/assaults/vagrants and serious crimes at station	VA	Train Operator -

				separate Incident to be created for each Operator involved (V##*)
	l	Ticket irregularities	VE	Train Operator involved (V##*)
	m	Police searching train (not security alert)	VG	Train Operator involved (V##*)
	n	Seat reservation problems	TF	Operator of train involved (T##*)
	o	Passengers falling/collapsing onto the platform during the course of boarding or alighting from a train (including when train movements are halted in consequence)	RY/VD	Operator of train involved (R##*/V##*) – Incident classed as occurring on board
	p	Platform closures for safety or security reasons relating to passenger behaviour on board a train (including when train movements are halted in consequence)	V* (as relevant to incident)	Operator of train involved (V##*) – Incident classed as occurring on board

Rewrite the footnote to Section N4.1 which appears immediately after the scenarios table, as below:

~~Note: In respect of circumstances 'e' and 'f' in table N2 above the identification of the Causal Incident should be concluded by consideration of the following points:~~

	~~• That the delay is the result of an incident that caused an unplanned closure of an alternative route~~ ~~• That the transfer of passengers from any off-route location in relation to the train affected is within the agreed ticket acceptance for the line of route and location that the parties have agreed in relation to the Causal Incident.~~ ~~• Relevant performance data or other appropriate evidence is provided to demonstrate that the train delayed does not generally suffer overcrowding or delay at the station(s) in question.~~ ~~• Where the Causal Incident is identified as being the Responsibility of another Operator the evidence must be provided to enable reattribution to be made within the relevant Contractual Timescales.~~ ~~• Where the Causal Incident cannot be determined (e.g. multiple incidents created for one event or multiple events) then Delay Code RX should be utilised.~~ For Scenarios g and h above, the following factors should be considered in order to determine whether a "Causal Incident" for increased passenger numbers can be identified: • Is the delay the result of an incident that caused an unplanned closure of ~~a different~~ an alternative line of route? • Are the tickets of passengers who were booked to travel via the other route being accepted due to the disruption? • Is relevant performance data or other appropriate evidence available to demonstrate that the train delayed does not generally suffer overcrowding or delay at the station(s) in question (i.e. the increase in passenger numbers is genuinely a consequence of passengers having to use the service as an alternative to their ticketed train)? In cases where the above criteria apply, and a single disruptive event can be identified as the reason for the increased passenger numbers, this is the Causal Incident and attribution of associated passenger loading delays should be allocated to it as per scenario ~~f~~ g. In cases where the above criteria apply but no single Causal incident can be identified as the reason for the increased passenger numbers (including in cases where disruption is found to be the accumulated impact of various different incidents), delays should be allocated to the operator of the train delayed using code RX, as per scenario ~~g~~ h. *Remove delay code RZ as a potential code to use in connection with passengers falling between the train and platform from Clause N9.1.e as below:*

<table>
<tr>
<td></td>
<td>
<table>
<tr><td>e.</td><td>Passenger fallen between platform and train whilst boarding/alighting from that train (including preventative measures taken to prevent this from occurring including delayed train dispatch)</td><td>RY~~/RZ~~</td><td>Operator of train involved (R##*)</td></tr>
</table>
Amend N 10.1.a as below:
N10.1 Likely Situations
<table>
<tr><th>No.</th><th>Circumstances</th><th>Delay Code</th><th>Incident Attribution</th></tr>
<tr><td>a</td><td>Member of station staff has not confirmed with the Signaller after a splitting or joining procedure that the train(s) was positioned in the correct part of the platform. The second train for that platform is then held outside pending confirmation.</td><td>R3/R4/R5 ~~as appropriate~~</td><td>To Operator of train for which operational procedure is not confirmed as completed</td></tr>
</table>
</td>
</tr>
<tr>
<td>Reason for the change</td>
<td>
Several Clauses within Section N (Station Operating Delays) require update and/or would benefit from clarification.
Firstly, the cross-referencing in the existing footnote to Section N4.1., which covers the concept of “Causal incidents” with relation to passengers who use alternate lines of route to what their tickets would normally allow, is incorrect/out-of-date. (The current entry refers erroneously back to Section N2 and also quotes incorrect sub-clauses). This is certainly in need of correction.
Additionally, the opportunity has been taken to add the following points of clarification within the section:

The explanatory note on causal incidents would benefit from simplification and has been fully rewritten as such. The new proposed wording attempts to break down the considerations as to whether a causal incident exists and can be determined, whereas the pre-existing entry appears to be more of a general list of attribution considerations relating to TOC/Station operating delays.
As part of the above amendment, a reference to ensuring that any attributions to a TOC are made within contractual timescales has been removed. Although the existing entry is factually correct, it applies to <u>any</u> instance where a delay needs to be reallocated to a train operator after the date of occurrence, and there does not appear to be any obvious logic to be stressing the point within a clause that is supposed to be dedicated to the subject of passengers diverting via an alternative line of route. Its inclusion arguably dilutes the key principles that are being addressed.
References to using specific delay codes “as appropriate” have been removed as the comments are self-evident and serve no obvious useful purpose.

</td>
</tr>
</table>

	• With particular reference to Scenario N9.1.e, relating to passengers that fall between the train and platform, codes RY (Station mishaps) and RZ (Other station operations issues) are both cited as potential codes to use in this scenario. In practice, it is not felt to be clear why/when RZ would be used ahead of RY in such a case and, therefore, there is no obvious logic to continue citing the code. This proposal therefore removes RZ as a potential code to use. However, if parties believe that RZ is still needed in this scenario and can suggest suitable wording to explain the different scenarios where RY and RZ should be used, DAB would be willing to incorporate this within the proposal. It is emphasised that, despite the relatively detailed changes being proposed, these are all for the purpose of clarification and would not alter responsibility for station operating delays in any way.

5. Do you perceive that this proposal will have a wider impact (including commercial impact) on your business or the business of any other industry parties?

If yes;
For Network Rail – Please provide an impact assessment indicating the impact of the proposal on all affected industry parties.
For Train Operator – Please provide an impact assessment on your own business.

No. Amendments intended for clarity only.

6. If you have provided an impact assessment as per question 1 above, please provide a proposed solution to neutralise any financial effect of the proposal.

N/A

Industry Responses

Network Rail	**C. NO, UNLESS SUGGESTED AMENDMENT IS APPLIED** A cross-reference within the rewritten footnote for Section N4.1 is wrong. The entries “as per scenario f” in the penultimate paragraph and “as per scenario g” in the final one should say “as per scenario g” and “as per scenario h” respectively. These are the two clauses that address whether a single “causal incident” has been identified as the reason for passenger not travelling via their intended line of route.

DAMG	**C. NO, UNLESS SUGGESTED AMENDMENT IS APPLIED** Likely situation F, the proposed wording changes the application of this guidance to be based on a train that is planned to serve the same station and/or line of route from from *Another identified prior scheduled Responsible Train that was planned to serve the same station* *and/or the same line of route but is delayed or cancelled.* [to] *Another identified prior scheduled Responsible Train that was planned to serve the same station* *and/or on the same line of route but is delayed or cancelled.* ADA35. 116 specifies the criteria for an alternative route, changing to "different" changes the context of applicability From Is the delay the result of an incident that caused an unplanned closure of a different line of route? To Is the delay the result of an incident that caused an unplanned closure of an alternative line of route? The additional words are already covered by the Delay Attribution statement of Good practise Viii From Is relevant performance data or other appropriate evidence available to demonstrate that the train delayed does not generally suffer overcrowding or delay at the station(s) in question (i.e. the increase in passenger numbers is genuinely a consequence of passengers having to use the service as an alternative to their ticketed train)? To Is relevant performance data or other appropriate evidence available to demonstrate that the train delayed does not generally suffer overcrowding or delay at the station(s) in question ~~(i.e. the increase in passenger numbers is genuinely a consequence of passengers having to use the service as an alternative to their ticketed train)~~?

Secretary Note	NR comment appears valid – references to scenarios f and g in the final two paragraphs of the new footnote need to be changed to g and h respectively. Re: DAMG comments: • No objections to adding the word "on" to scenario f as requested, although I am unsure how this changes/clarifies the meaning of the clause. • Again, no objections to changing the reference in the new footnote from "a different line of route" to "an alternative line of route". • And no strong objections to removing the bracketed comment *(i.e. the increase in passenger numbers is genuinely a consequence of passengers having to use the service as an alternative to their ticketed train)* from the footnote. But am unsure why this is felt to be desirable or why Clause VIII of the Good Practice Statement (which covers the expectation that parties provide/share information to enable accurate attribution) has been cited as the basis for doing so.

Board Consultation	Members agreed that the references to scenarios "f" and "g" in the final two paragraphs of the rewritten N4.1 footnote did need to be revised to "g" and "h" respectively. Seperately, it was agreed that the first two of DAMG's three requested amendments (namely the inclusion of the word "on" within scenario N4.1.f and replacing "a different" with "an alternative" [line of route] within the N4.1 footnote) should be applied. In both cases, it was agreed that the changes would not detract from the meaning of the sections in question and may potentially add clarity. However, it was decided not to adopt the third DAMG request (to remove the bracketed clause from the same footnote explaining that there must be evidence that passenger overcrowding on a train is the result of a dispruptive event on another line of route in order for the associated TRUST incident to be considered "causal"). The Board felt that this entry was an important/worthwhile point of clarification and, even if DAMG's argument that the clause simply reiterates Clause VIII of the Good Practice Guide was accepted, the Board could see no reason not to include it as a point of emphasis in the context of identify whether an identifiable "causal incident" exists. As such, the amendment requested by Network Rail and the first two of those requested by DAMG have been applied to the proposal, but the third DAMG request has not.

<table>
<tr><td>Originators Reference Code / No [For DAB input]</td><td>DAB P395</td></tr>
<tr><td>Name of the original sponsoring organisation(s)/ point of contact</td><td>[redacted]</td></tr>
<tr><td>Exact details of the change proposed</td><td>
Remove references to “appropriate” or “as appropriate” as listed below:

H2.3.d
<table>
<tr><td>d.</td><td>Delays to trains on the Network Rail network because an early running train cannot enter an off-Network Rail network depot, terminal, yard or siding.</td><td>OB, OC or OD ~~as appropriate~~</td><td>Network Rail (OQ**) See Section K7</td></tr>
</table>

H3.3.b/c/e
<table>
<tr><td>b.</td><td>Right time departure delayed waiting passage of late running train(s) on the Network Rail network</td><td>YB, YE or YG ~~as appropriate~~</td><td>Incident(s) causing other train(s) to be late at that point</td></tr>
<tr><td>c.</td><td>Right time departure delayed waiting passage of early running train on the Network Rail network</td><td>OB, OC or OD ~~as appropriate~~</td><td>Network Rail (OQ**) See Section K7</td></tr>
<tr><td>e</td><td>Fire or Security Alert occurring in an off Network Rail network location that is directly affecting the Network Rail network and preventing trains from passing that location (Not including trains booked into that location or trains in a queue behind those trains) (See Flow Diagrams Q7.7 and Q8.8)</td><td>XI/XL ~~(As appropriate)~~</td><td>Network Rail (XQ**)</td></tr>
</table>

H3.4
</td></tr>
</table>

It will be the responsibility of the Train Operator in any off-Network Rail network location to provide the necessary information to Network Rail to accurately allocate the Minutes Delay to an Incident. For Freight Operators this will often be by use of the Late Start Reason Code in the TOPS/SDR Departure input. Any incident attributed on the basis of such input must state the data source in the freeform text. When a Y* code is used the Operator must advise Network Rail the reporting number of the delayed inward working. The Delay Attribution staff must ensure that this reactionary delay is validated and then attributed to the prime incident. If no information is provided, then the Delay Minutes will be allocated to an Incident coded FW or TZ ~~as appropriate~~ and attributable to that Train Operator.

L1.8

For any train running without a schedule on the Network Rail network which incurs and or causes delay the following should apply:

- If a train is running without a schedule and no other cause is identified any resulting reactionary delay incurred by other trains should be attributed to OC or OD ~~(as appropriate)~~ for running the train without a schedule.
- If a train running with no schedule is part of failed train recovery activity then refer to Section M3.3.
- If a delay cause can be clearly ascertained any reactionary delays caused by the train running with no schedule should be attributed to the identified cause with a clear explanation provided in that TIN.

O3.2.x

x	Track Circuit Failure due to flooding / being underwater	JK or X2 ~~as appropriate~~	Network Rail (IQ** / XQ**)

O11.1.b

b	Confirmed user error of train dispatch equipment	R1 / R2 ~~as appropriate~~	Operator of train being dispatched (R##*)

O15.2

Staff safety related incidents (delay Code JL) should NOT be considered when:

- A subsequent reactionary failure occurs (e.g. tracing a fault in a LOC that causes a TCF due to a loose wire).
- A fault manifests itself after 24 hours of train running from any work being carried out (which should be considered an asset failure regardless of any staff cause)
- Any process or procedural issue occurred days or weeks prior to the failure.
- Damage is caused by incorrect use of on-track machinery (use Delay Code J8)
- A late hand back of possession / line block is due to staff communication issues (use Delay Code I5 / I6 ~~as appropriate~~)
- The issue relates to Warning Boards (use Delay Code IQ – see O16)
- The issue is Operations staff related (utilise Delay Code OC or OK as appropriate e.g. Crossing Keeper, MOM)

O18.4.f

f.	Published TSR due to condition of track or structure (not Engineering Work related) **not** covered by sufficient Engineering Allowance within a train's schedule.	JS / JD ~~(as appropriate)~~	Network Rail (IQ**)

O19.2.1.4

Any speed restriction due to a buckled rail or other track defect (including when CRT has not been exceeded) should be coded to IR or IS ~~as appropriate.~~

P2.16

If Minutes Delay are incurred by infrastructure trains running in their booked path on approach to the possession site but are delayed waiting for the possession to be (partly) given up as per published arrangements for the possession, the Incident to be coded I5/ I6 ~~(as appropriate)~~ and attributed to Network Rail.

P2.19.k

	k.	Waiting for a line ~~blockage to be given up to pass~~ to be temporarily reopened, as per the plan, to allow for the passage of a booked train during the planned times of the possession or track patrol. If published any P* code allowance should be utilised.	I5 / I6 ~~as appropriate~~	Network Rail organisation causing the overrun (IQ**).

Q4.1.c and d

c.	Objects are thrown/fired at trains or onto track on non-Network Rail infrastructure from outside railway premises.	VB /AZ ~~as appropriate~~	Train Operator – separate incident to be created for each operator affected (V##*/A##*).
d.	Theft, trespass or vandalism affecting trains including damage to fleet equipment originating from non-Network Rail infrastructure, except, objects being thrown or fired.	VB /AZ ~~as appropriate~~	Train Operator – Separate incident to be created for each operator affected (V##*/A##*).

Q8.1.m

m.	Fire on freight train.	MB/MC/ML ~~As appropriate~~	Operator of train involved (M##*).

R2.4.k and l

k.	Head or tail lights are missing, not lit or wrongly displayed	FM (freight) or TG (passenger trains) ~~as appropriate~~	Operator of train concerned (F##* or T##*)

				~~to type of train~~	
		l.	The Train Operator staff are unable to find the reported train-related safety problem or can prove the report to be false.	FZ, M9 or TZ ~~as appropriate to type of train~~	Operator of train concerned (M##*, F##* or T##*).
Reason for the change	As an offshoot from the revisions to Section N proposed within DAB P394 (and specifically the proposed removal of references to applying the "appropriate" delay code within that Section in particular) it was noted by DAB that similar entries also appear in several other sections of DAPR. This proposal therefore proposes the equivalent removal of this phrase from Sections of DAPR other than Section N. As noted in the previous proposal, these were not felt to add any clarification to the scenarios in the document. Note that the opportunity has been taken to rephrase/clarify scenario P2.19.k beyond simply removing the reference to "as appropriate". This is because the scenario is currently written only in the context of "Line Blocks" where, as the list of possible delay codes to use confirms, the scenarios could equally apply to issues with a full Possession of the Line.				

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7. Do you perceive that this proposal will have a wider impact (including commercial impact) on your business or the business of any other industry parties?

If yes;
For Network Rail – Please provide an impact assessment indicating the impact of the proposal on all affected industry parties.
For Train Operator – Please provide an impact assessment on your own business.

No – Clarification only

8. If you have provided an impact assessment as per question 1 above, please provide a proposed solution to neutralise any financial effect of the proposal.

N/A

Industry Responses

Network Rail	**A: YES, PROPOSAL IS AGREED WITH AS WRITTEN.**
DAMG	**A: YES, PROPOSAL IS AGREED WITH AS WRITTEN.**

Secretary Note	-

Board Consultation	No comments had been forthcoming from the consultation, and with no further issues raised by members, the proposal was approved for referral to ORR as originally written.

<table>
<tr><td>Originators Reference Code / No [For DAB input]</td><td>NR P242</td></tr>
<tr><td>Name of the original sponsoring organisation(s)/ point of contact</td><td>Network Rail
[redacted]
[redacted]</td></tr>
<tr><td>Exact details of the change proposed</td><td>Amend the description of Delay Code I7, quoted in Section S of DAPR, as below:
<table><tr><td>I7</td><td><s>Engineer's train late into, from or failed in possession</s>
Access of engineer’s trains into/egress out of possessions</td><td>ENGNRS TRN</td></tr></table></td></tr>
<tr><td>Reason for the change</td><td>The current Section S reference to Code I7 being used for failures within a possession is incorrect and in direct contravention of the principles detailed in Section P1.f and g (which state that responsibility for the failure should be allocated to the operator of the train involved using the appropriate M* code).

I7 specifically relates to delays in accepting such a train into a possession or releasing a train from it due to operational possession issues, as documented in P1.c and d.

As such, the erroneous reference to “failed” trains in the current description needs to be removed and the alternate wording is proposed as a succinct, precise alternative.</td></tr>
</table>

9. Do you perceive that this proposal will have a wider impact (including commercial impact) on your business or the business of any other industry parties?

If yes;
For Network Rail – Please provide an impact assessment indicating the impact of the proposal on all affected industry parties.
For Train Operator – Please provide an impact assessment on your own business.

No – Clarification for consistency with existing principles P1 f and g only.

10. If you have provided an impact assessment as per question 1 above, please provide a proposed solution to neutralise any financial effect of the proposal.

N/A

Industry Responses

Network Rail	**A: YES, PROPOSAL IS AGREED WITH AS WRITTEN.**
DAMG	**A: YES, PROPOSAL IS AGREED WITH AS WRITTEN.**

Secretary Note	-

Board Consultation	No comments had been forthcoming from the consultation, and with no further issues raised by members, the proposal was approved for referral to ORR as originally written.

Originators Reference Code / No [For DAB input]	**NR P244**
Name of the original sponsoring organisation(s)/ point of contact	[redacted]
Exact details of the change proposed	*Change the 10 character abbreviations of the TRUST codes, as listed below, in DAPR Section S.*

Code	Current	Proposed description and comments
IA	~~SIGNAL FLR~~	SIG FLR - *SIG now consistently used*
IB	~~POINTS FLR~~	PTS FLR - *PTS now consistently used*
IC	~~TC FAILURE~~	TC FLR - *TC and FLR now consistent*
ID	~~LEVEL XING~~	LC FLR - *FLR now consistently used*
IE	~~SIG FUNC PWR~~	POWER SIG - *now 10 characters*
IH	~~PWR SUP DIS~~	POWER DIS - *now 10 characters*
IJ	~~AWS/ATP~~	AWS/TPWS - *TPWS more common than ATP*
IN	~~HABD FAULT~~	HABD FLR - *FLR now consistently used*
IP	~~POINT HEAT~~	PTS HEATER - *PTS not consistently used*
I4	~~SUPPLY FLR~~	PWRSUP FLR - *more descriptive*
I5	~~OVERRUN~~	POSSN ORUN - *explains type of over run*
I6	~~LINE BLOCK~~	BLOCK ORUN - *explains type of over run*
JA	~~TSRNOT EAS~~	TSR NOTTPR - *not train planning rules.*
JR	~~RBC~~	RBC ERTMS - *ERTMS added*
JS	~~TRACK COND~~	TSR COND - *TSR added used for TSRs*
JT	~~NO PNT HTR~~	NO PTS HTR - *PTS consistent*
J3	~~AXLE C FLR~~	AC FLR - *AC and FLR consistent*
OA	~~ENDVR REG~~	BESTENDREG - *Best endeavours regulation*
OB	~~REGULATION~~	REG - *Attributers need to enter REG*
OG	~~ICING~~	ICEOHLE3RD - *Explains the ice issue*
OH	~~ARS / TMS~~	ARS/TMS - *spaces removed consistency*
OK	~~OPTG STAFF~~	OPS STAFF - *Ops more consistent*
PA	~~PLANND ENG~~	TSR PLANED - *It is for planned TSRs*
PB	~~PLANND CON~~	TSR P COT - *it is for planned COT TSRs*
PG	~~OP P CANC~~	TOCPLANCAN - *For a TOC planned cancel*
PN	~~VSTP DELAY~~	VSTP SCHED - *Sched is consistent 4 min max*
QJ	~~LEAVES T/C~~	LEAF TCFLR - *TC and FLR consistent*
XC	~~FATALITIES~~	FATALITY - *Now a singular*
XL	~~EXTL FIRES~~	EXT FIRES - *More consistent*
X4	~~KRS / BLKT~~	KRS/BLKT - *Spaces removed*
X9	~~PNTS SNOW~~	PTS SNOW - *Consistent use of PTS*
YN	~~FIND CREW~~	CREW UNAV - *Definition is unavailable*
YQ	~~SHRT FRMD~~	SHORT FORM - *Reads better less abbreviated*
YR	~~SR CNCL~~	SR CANC - *CANC more consistently used*
YX	~~OVER CRWD~~	~~OVER/CROWD~~ OVERCROWD - *Crowd in full*
ZX	~~SYS L-STRT~~	SYS LSTART - *start in full*

Reason for the change	Better clarity for users of TRUST as to the reason. Two codes are currently greater than 10 characters. More consistency

13. Do you perceive that this proposal will have a wider impact (including commercial impact) on your business or the business of any other industry parties?

If yes;
For Network Rail – Please provide an impact assessment indicating the impact of the proposal on all affected industry parties.

For Train Operator – Please provide an impact assessment on your own business.

It is not believed to have any commercial impact

14. If you have provided an impact assessment as per question 1 above, please provide a proposed solution to neutralise any financial effect of the proposal.

N/A

Industry Responses Overleaf

GBRf	**B. YES, BUT AMENDMENT(S) TO THE PROPOSAL ARE RECOMMENDED** Some proposed abbreviations are un-necessary IA – No need to shorten SIGNAL to SIG, you have enough characters to leave as is. IB - No need to shorten POINTS to PTS, you have enough characters to leave as is. (PTS is also an abbreviation for Personal Track Safety, whilst irrelevant in context it demonstrates there is no need to change it). IC – Leave as current TC FAILURE, you have enough characters available to avoid an abbreviation so there is clearly no need to change it. I5 – Would a change to PSSN ORUN be more standard? PSSN in a more regular abbreviation in my experience. J3 – Change to AC FAILURE as there enough characters available to avoid abbreviation. OB – Change rejected, un-necessary abbreviation, enough characters to leave in full.
DRS	**B. YES, BUT AMENDMENT(S) TO THE PROPOSAL ARE RECOMMENDED** DRS believe that some of the proposed abbreviations appear to be unnecessary: IA – No need to shorten SIGNAL to SIG. There are enough characters to leave as is. IB - No need to shorten POINTS to PTS. There are enough characters to leave as is and we also believe its would introduce confusion with Personal Track Safety (also PTS). IC – No need to change TC FAILURE. There are enough characters to leave as is. J3 – Change to AXC FAILURE as there enough characters available to improve clarity. OB – No need to shorten. There are enough characters to leave as is.
Network Rail	**A: YES, PROPOSAL IS AGREED WITH AS WRITTEN.**

DAMG	**B. YES, BUT AMENDMENT(S) TO THE PROPOSAL ARE RECOMMENDED** **from** IA – No need to shorten SIGNAL to SIG, you have enough characters to leave as is. IB - No need to shorten POINTS to PTS, you have enough characters to leave as is. (PTS is also an abbreviation for Personal Track Safety, whilst irrelevant in context it demonstrates there is no need to change it). IC – Leave as current TC FAILURE, you have enough characters available to avoid an abbreviation so there is clearly no need to change it. I5 – Would a change to PSSN ORUN be more standard? PSSN in a more regular abbreviation in my experience. J3 – Change to AC FAILURE as there enough characters available to avoid abbreviation. - AC also sounds like a power failure AXLE C FLR OB – Change rejected, un-necessary abbreviation, enough characters to leave in full. ID LEVEL XING LC FLR - FLR now consistently used -LC abbreviation loses context LXING FLR

Secretary Note	Firstly, please note that the repeated text in the responses above reflects what was submitted by the parties (i.e. the close similarities in wording are genuine). Although Network Rail omitted to explicitly mention it in their justification for this proposal, it is understood that most of the changes challenged within these responses had been proposed to make the code descriptions more consistent with the organisation's internal EESIC (Essential Elements of Standard Incident Creation) standards. These make widespread use of standardised abbreviations (such as "reg" instead of "regulation") to mitigate for the fact that the TRUST "Incident Description" field is only able to accommodate a limited number of digits. The main purpose of applying these same abbreviations to incident short descriptions was – as I understand IT – for them to serve as an aide memoire for inputters to use when describing incidents in the Description field. Therefore, the decision for members here is essentially what should be prioritised – support/cross-referencing for Delay Attributors to ensure consistency of input or a focus on "plain English" that will theoretically benefit those who review TRUST data but are not necessarily familiar with/concerned by EESIC standards.

Board Consultation	Members considered the point raised in the Secretary's Note section regarding the apparent difference in priorities between Network Rail (who, through at least some of the amendments in this proposal, were looking to bring code abbreviations more closely into line with those that Network Rail inputters are required to use when manually typing up the explanation of an incident) and the respondents to the proposal (who were effectively promoting the use of as much "plain English" as possible within these necessarily brief abbreviations). Ultimately, whilst noting the different perspectives, the Board agreed to approve the proposal, without the removal of any of the individual entried within it. This was on the basis that all of the parties suggesting amendments had done so only as a recommendation – none had stated that their approval for the approval was conditional on changes being applied. The only post-consultation amendement applied, as such, was to the abbreviation of delay code "YX" which was revised from "OVER/CROWD" to "OVERCROWD". It was agreed that the oblique in the original proposal was spurious, since "overcrowd" is a single word.

END