

Oliver Stewart
RAIB Recommendation Handling Manager



25 June 2026

Mr Andy Lewis
Deputy Chief Inspector of Rail Accidents

Dear Andy,

RAIB Report: Track workers struck by a train at Margam on 3 July 2019

I write to provide an update¹ on the action taken in respect of recommendation 4 addressed to ORR in the above report, published on 12 November 2020.

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 4 is **'Closed'**.

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

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

Recommendation 4

The intent of this recommendation is that Network Rail has a renewed and sustained focus on improving the non-technical skills of all its track maintenance teams, including their supervisors and managers, in those areas most closely associated with site safety. When addressing this recommendation, Network Rail should take into account actions taken in response to Recommendation 1 of RAIB's Egmonton investigation (RAIB report 11/2018) and Recommendation 2 of RAIB's track worker class investigation (RAIB report 07/2017).

Network Rail should review its processes and programme for developing the social, cognitive and personal 'non-technical skills' of those working on or near the track, with a particular focus on those areas that are linked to effective communication, cooperation, leadership and positive team dynamics. By means of this review Network Rail should ensure that it has in place all that is necessary for the timely provision of an ongoing and sustained programme of suitable, relevant and targeted training and mentoring that will influence the mindset and attitudes of everybody involved with planning and delivery of work activities, including managers, supervisors, site leaders and team members. Network Rail should also issue practical guidance on:

- a) ways of assessing non-technical skills and development potential when selecting future site leaders
- b) methods for evaluating and developing the non-technical skills of those already undertaking leadership roles
- c) how to intervene when concerned about the performance of a safety leader.

ORR decision

1. Network Rail has developed NTS material for inclusion in training courses, including PTS & COSS. Network Rail has agreed, and funded, NTS training for COSS initial and re-certification training, meaning all COSS's will have received NTS training by December 2026.

2. Following on from the closure statement in 2024, we asked Network Rail for commentary on the embedment of the measures described:

- Planning training (SP01 / SP02): SP01 has been refreshed and moved to eLearning; SP02 is being updated and will remain classroom-based.
- Safe System of Work Planner: Competence standard due for review and alignment with updated standards (NR/L2/OHS/019, Rule Book Dec 2025, NR/L2/CTM/021), with training updated to include planning tools like Rail Hub.
- Standards updates: Revised versions of NR/L2/OHS/019 and NR/L2/CTM/021 (Dec 2025) are now in place.
- Competence changes:
 - Mandatory mentoring for all competencies
 - Stronger focus on non-technical skills and safety leadership
 - Line managers must confirm individual suitability before training
- Ongoing checks of competence, capability, and confidence before recertification

- Training updates: Track safety training and supporting materials are being updated to reflect new standards and include non-technical skills guidance.

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

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

Status: Closed.

Previously reported to RAIB

4. On 10 November 2021 ORR reported the following:

Network Rail has reviewed its provision of NTS training, including benchmarking against RSSB. We have asked Network Rail to take into account work that is already being done, map it against each point in the recommendation and be clear how each point is being addressed.

We have asked Network Rail for an updated action plan. The first 5 milestones have been completed. The options for review at the Capability Development Group (CDG) milestone is still relevant but needs reforecasting.

At our most recent update meeting in October, Network Rail reported good progress in this area. It has appointed new specialist support for NTS – and is drawing up a strategy for all the business, not just Maintenance. A NTS framework has been established, bringing together some previously separate work streams. The work being carried out in this area is wider than just providing training and is about helping people develop NTS throughout their career – not just selecting those with appropriate capabilities. Network Rail has been liaising with RSSB on the topic – to learn from other businesses but also to feed into industry-wide improvements.

Update

5. On 23 January 2024 Network Rail provided the following closure statement:



[N222-13] Margam
Rec 4 Closure Stater

6. On 26 February 2026 Network Rail provided the following update:

Planning of work - Maintenance Function

See the attached email for an update on changes and planned changes. In addition:



RE Maintenance
Planner Competence

- *SP01 – has been updated to reflect changes to working practices over the past 5 years since they were originally created. We've also transferred this to eLearning now to start the planners learning journey earlier*
- *SP02 – is being rewritten now again to update it and will remain as an in-person course. That update is due to be completed by the end of next month.*

Safe System of Work Planner

The competence standard will go into review this year to make sure it is updated to meet the requirements of NR/L2/OHS/019 issue 13.

The intent is then to update the training, to cover recent Rule Book changes December 2025, 019 and as applicable the new issue of the NR/L2/CTM/021 December 2025. The intent is to make sure the training covers the use of planning systems e.g. Rail Hub.

Safety of people at work on or near the line NR/L2/OHS/019

See the attached briefing note for the main changes made.



NR_L2_OHS_019
Issue 13 Briefing note

Track Safety Competence Standard NR/L2/CTM/021

The new version of the standard was compliant from December 2025.

See the attached standards briefing note for the main changes.



NR_L2_CTM_021
Briefing note Septem

An item to emphasise is that all competences now have a mentoring requirement. All competencies have non-technical skills and for IWA and above safety leadership training requirements.

The competence standard now has a requirement on the sponsor/line manager to confirm that an individual has the potential to undertake initial training based on each competence requirements.

That for any existing competence holder at the annual review (Network Rail and Supply Chain) and this prior to recertification event depending on the competence they continue to have the required competence, capability and confidence to hold a competence.

Track Safety Training

The training has been updated to feature the changes in 019, 021 and the Rule Book December 2025.

Key Point booklets (PTS to ES)

These are now in the process of being reviewed and updated for technical content and will include guidance on the non-technical skills and for IWA and above safety leadership training requirements.

7. On 7 May 2026 ORR wrote to Network Rail as follows:

Can you explain how the info provided gives confidence that training and mentoring around NTS, particularly around situational awareness, are embedded?

8. Network Rail responded on 13 May 2026 as follows:

The question below is not very clear and a number of times there have been discussions on the correct use of the term 'situational awareness' in this context.

We had updated the training materials for PTS as part of Surbiton and also amended COSS training.

Session 5 of COSS training (understanding your site) talks about this; a screen shot is below. There is also an exercise on this.

Process	Resources	Trainer Activities	Delegate Activities	Assessment (I,F,S)
		- The route from the site of work maybe the same as the access route - The COSS as part of their verification must check that these arrangements are suitable - If the work is not planned in advance, it is the responsibility of the COSS to decide on the safest route to where the work will be taking place - NTS Situational Awareness – Use the POV images to orientate themselves with the diagrams and RouteView imagery - Walking at 1.25m from the line (up to 3m) from an open running line is currently permitted by Network Rail company standards. - Establishing a 2m distance from an open line when walking to and from a site of work (covering the key points below) - The COSS must give the group an identifiable limit - In a non-standard 6ft area the COSS might give the limit as the middle of the 4ft of the blocked line - The distance between the outside edges of the 6ft rail can vary. 1970mm is the standard 6ft spacing although Network Rail standards allow as narrow as 1690mm in places 2m is very difficult to establish in the cess, sometimes the edge of the troughing route as the limit, However, troughing routes are not always 2m from the track, they can snake in and out around obstructions - Separated Protection might be used to walk a group along the authorised walking route/safe cess to a site of work, using the edge of the route as the definable limit. Site Wardens cannot be used when walking to/from a site of work. - Carrying tools while walking		

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ORR decision

1. Network Rail has reviewed its provision of NTS training, including benchmarking against RSSB. We have asked Network Rail to take into account work that is already being done, map it against each point in the recommendation and be clear how each point is being addressed.

2. We have asked Network Rail for an updated action plan. The first 5 milestones have been completed. The options for review at the Capability Development Group (CDG) milestone is still relevant but needs reforecasting.

3. At our most recent update meeting in October, Network Rail reported good progress in this area. It has appointed new specialist support for NTS – and is drawing up a strategy for all the business, not just Maintenance. A NTS framework has been established, bringing together some previously separate work streams. The work being carried out in this area is wider than just providing training and is about helping people develop NTS throughout their career – not just selecting those with appropriate capabilities. Network Rail has been liaising with RSSB on the topic – to learn from other businesses but also to feed into industry-wide improvements.

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

- taken the recommendation into consideration; and
- is taking action to implement it by 30 October 2023.

Status: *Implementation ongoing.* ORR will advise RAIB when actions to address this recommendation have been completed.

Information in support of ORR decision

5. On 1 February 2021 Network Rail provided the following initial response:

Action Plan

Action Plan (with milestones)

There needs to be a Gap analysis of all the different workstreams that has and is looking at Non-technical skills training, the list below is not a complete list but are known projects that are looking at the same thing. A National framework can then be established and reported into the outcome of Recommendation 5.

Please note: There are multiple projects addressing behaviours (not NTS) which we will list below, but we will ensure they are not addressing NTS, and we will not seek to amalgamate these.

1. Role Based Capability (RBC) programme
2. PA Consulting review that is being used as part of the proposed PiC Competence that is going to the ELT in January 2021 presented by the Safety Taskforce - **this will determine the guidance to meet a) and c) of the recommendation.**
3. Review of previous Track Safety changes and its impact such as Non-Technical skills for COSS and COSS Theory
4. Section Planner Training being developed by Maintenance
5. BeST and SCD Safety Culture Improvement Programmes (Southern) which is incorporated into the PTS training being launched in April
6. Benchmark training review (Southern)
7. Review of previous RAIB recommendations and closure statements around non-technical skills/behaviours to see if these have made a difference or have continued.
8. Signalling have developed their own NTS and training apparently in response to the Waterloo recommendation, so we need to investigate this too.
9. Consult with Operations on their NTS

Milestones

- Proposal to review all Non-Technical skills workstreams in order to start developing an outline plan provided to the Chief Health & Safety Officer – **28th February 2021**
- Inform, liaise and align with other interested parties; Company Capability Steering Group; NR Ops; NR Training; NR HR – **26th March 2021**
- NR to identify a single owner for NTS to potentially align with the owner of Behaviours – **28th May 2021**
- Benchmark against RSSB NTS - **26th March 2021**
- *If the proposal is agreed*, Project management and Subject Matter Expert (SME) resource to be obtained – **31st July 2021**
- Once this gap analysis has been completed, the results, *options to be taken to the Safety CDG for support to proceed*, then a time bound action plan will be developed and put in place – **30th September 2021**
- *If the proposal is not agreed*, the development of the PiC competence will continue should that be approved at ELT– **January 2023**
- Monitor and review any changes made – **30th September 2023**
- Update report to be provided after the review to demonstrate effects of the interventions - **30th October 2023**

Behaviours based projects that we will consult with, but not incorporate in this action plan:

- JMJ behavioural review (*linked to the outcomes of Recommendation 6*)
- New PTS, COSS, Lookout and Site Warden training that has been introduced that is more behavioural training and has assessment throughout the training on the behaviours of the delegates. This also includes challenge of un-safe behaviours or leaders.
- Review of other track safety competences such as ES and PC and embed behaviours content as required.
- Other Regions behavioural training such as the Risk Perception and Awareness training accredited by IOSH on Eastern Region.
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- Capital Delivery behaviour training
- COSS training changes 2017-19 which included the COSS training proposed changes from 2013 much of this is in the PiC Competence proposal
- ISLG report into COSS and behavioural training
- T02842 - Competency and Capability (*linked to the outcomes of Recommendation 6*)- **this will determine the guidance to meet b) of the recommendation.**

Evidence required to support closure of recommendation

Minutes of meetings to be provided
Evidence of changes made to training and competence provided
Evidence of support from CDG to proceed with chosen option
Evidence of monitoring and review of the option chosen
Update report demonstrating the effects of the option chosen