

Oliver Stewart
RAIB Recommendation Handling Manager



25 June 2026

Mr Andy Lewis
Deputy Chief Inspector of Rail Accidents

Dear Andy,

RAIB Report: Runaway and derailment of wagons at Toton on 17 January 2021

I write to provide an update¹ on the action taken in respect of recommendation 4 addressed to ORR in the above report, published on 20 December 2021.

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 to reduce the risk of runaway vehicles that are derailed on trap points from fouling an adjacent line.

Network Rail should revise its risk assessment processes for both new and existing trap points so that it specifically considers the risk of an adjacent running line becoming fouled when uncontrolled vehicles run away from a siding. This should specifically consider the risks associated with derailments involving uncontrolled vehicles on trap points and the factors that influence how far the uncontrolled vehicles could travel once derailed

ORR decision

1. Network Rail has developed a new Trap Point risk assessment tool by integrating previously separate tools from the signalling, track, and operations disciplines. The tool incorporates geographic data, including expected run-off distances and nearby running lines.
2. In December 2025, Network Rail updated standard NR/L2/SIG/14201/Mod01 (Issue 3), introducing a dedicated section on Trapping Protection Risk Assessment. This change was communicated through the December 2025 standards update briefings and further detailed briefings shared with key stakeholders, including Operations Risk Coordinators, project teams, asset groups, and RSK. Additionally, a guidance document has been produced to support the use of the new tool when carrying out Trap Protection Risk Assessments.
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
 - has taken action to close it.

Status: Closed.

Previously reported to RAIB

4. On 20 December 2022 ORR reported the following:

As noted in the RAIB report, while Network Rail has company standards that cover the scheduled risk assessments required for signals being passed at danger and for collision with buffer stops, it has no similar formally documented processes or guidance for the risk assessment of trap points. It is not clear who should be responsible for carrying out any such risk assessments, how often the risk assessment should take place or what changes should trigger a reassessment. Network Rail aim to develop one common format for use across the business and incorporate it as part of a standard so it becomes the default approach via the standards system.

Network Rail are conducting bowtie analysis of the risk assessment aspects from track, signalling and operations bringing them together in an overall risk assessment process. The key aspects of the risk assessment process are to understand and assess risks of where a train will go if it is diverted through the trap points. A risk assessment also needs to take into account how different types of trap devices work and the effect on the train once derailed.

Once the bowtie process has been completed, a new risk assessment process will be developed, with the aim of publishing a revised standard in September 2023.

Update

5. On 17 March 2026 Network Rail provided the following closure statement:



[N250-17] Toton Rec
4.docx

Previously reported to RAIB

Recommendation 4

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ORR decision

1. As noted in the RAIB report, while Network Rail has company standards that cover the scheduled risk assessments required for signals being passed at danger and for collision with buffer stops, it has no similar formally documented processes or guidance for the risk assessment of trap points. It is not clear who should be responsible for carrying out any such risk assessments, how often the risk assessment should take place or what changes should trigger a reassessment. Network Rail aim to develop one common format for use across the business and incorporate it as part of a standard so it becomes the default approach via the standards system.
2. Network Rail are conducting bowtie analysis of the risk assessment aspects from track, signalling and operations bringing them together in an overall risk assessment process. The key aspects of the risk assessment process are to understand and assess risks of where a train will go if it is diverted through the trap points. A risk assessment also needs to take into account how different types of trap devices work and the effect on the train once derailed.
3. Once the bowtie process has been completed, a new risk assessment process will be developed, with the aim of publishing a revised standard in September 2023.
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

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

Information in support of ORR decision

5. On 17 May 2022 Network Rail provided the following action plan:

Action Plan

Please provide milestones with dates

Network Rail is currently reviewing the current trap point risk assessments to establish a consistent model, which is structured to encompass the needs of all disciplines.

Templates exist for Track Design, Signalling and operations, but each is incomplete for the management of risk.

This review has prompted the need to produce a framework of the risk assessment supported by bow tie analysis.

Bow tie is planned to be finalised by September 2022.

Completion of the bow tie will enable the revision and amalgamation of risk assessment templates into a single document, which is expected to be finalised by March 2023.

This may prompt revision to published standards and process, with scope and dates to be established during the review.

Evidence required to support closure of recommendation

Documented Bow tie assessment

Risk Assessment template document

Briefing document to support implementation to users / risk assessors