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D E Porter To: ORRSystemOperation

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Subject: System Operation Safety

Sir,

From:

I have read the 'System Operation - A consultation on making better use of the railway network' document and wanted to feedback views on the way safety issues are addressed within the proposed framework. I am a safety management specialist with 37 years as an inspector with the HSE and the Office for Nuclear Regulation. Until recently I was also a Public Member of Network Rail.

The consultation document is clear and well presented and sets out a meaningful high level framework for managing system operation. However, I do not believe that safety has been appropriately addressed in the design of the current structure. The assumption appears to be that total system risk can be maintained at the same level whatever the age and condition of the assets and however they are managed and controlled. My experience suggests otherwise.

Safety is the number one stated outcome of good system operation. It is the prime objective of ORR and Network Rail. However, safety is not integral to the processes set out in the framework. I could find no functions or activities which input safety risk information to the decision making processes. It may be present but it is not apparent fro the process described. The current NR dash board uses, 'Fatalities and Weighted Injuries for passengers, workforce and the public' to measure safety. This 'after the fact', event driven, lagging indicator alone is a poor measure of overall system risk and alone is insufficient to measure safety in a high hazard process based industry.

My thoughts are that:

- 1. This document should set out the mechanism for safe, cost effective system operation and be rethought with safety as an integral part of the process; 2. Reducing safety risk should be one of the key outputs of the process and comparable in 'weight and worth' to the other factors which feature predominantly at present.
- 3. A programme of work should be started which explores the how safety risk information can be provided to support a revised process.

I hope this is helpful. If safety is an agenda item at the October workshop I would welcome the opportunity to attend.

Regards and best wishes,

David Porter





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