

Oliver Stewart
Senior Executive, RAIB Relationship and
Recommendation Handling

Telephone 020 7282 3864

E-mail oliver.stewart@orr.gsi.gov.uk

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Mr Andrew Hall
Deputy Chief Inspector of Rail Accidents
Cullen House
Berkshire Copse Rd
Aldershot
Hampshire GU11 2HP

Dear Andrew,

RAIB Report: Passenger trapped and dragged by a train at Hayes & Harlington station, 25 July 2015

I write to provide an update¹ on the action taken in respect of recommendation 1 addressed to ORR in the above report, published on 30 June 2016.

The annex to this letter provides details of the action taken regarding the recommendation, the status of which is now '**Implemented**'. We do not propose to take any further action in respect of the recommendation, unless we become aware that any of the information provided becomes inaccurate, in which case I will write to you again.

We will publish this response on the ORR website on 25 September 2018.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Oliver Stewart', written in a cursive style.

Oliver Stewart

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

Recommendation 1

The intent of this recommendation is to improve the rail industry's understanding of passenger behaviour when boarding and alighting from trains and to identify the best methods and technology to promote safe behaviour.

RSSB, in consultation with the industry, and involving due industry process, should consider consolidating the findings from existing research and good industry practice, and undertaking new research as necessary to identify the optimum means for promoting safe behaviour by passengers when boarding and alighting from trains

ORR decision

1. RSSB has consolidated all of the work that the industry has been doing on research and good practice in the table below. In particular, it has implemented:
 - changes to the standard on train dispatch, namely RIS-3703-TOM Issue two – Rail Industry Standard for Passenger Train Dispatch and Platform Safety Measures;
 - published guides, articles and videos for staff responsible for safe dispatch; and
 - the integration of non-technical skills into safety critical roles, including train dispatch.

2. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, RSSB has:
 - taken the recommendation into consideration; and
 - has taken action to implement it.

Status: *Implemented.*

Previously reported to RAIB

3. ORR reported the following on 13 July 2017:

“We consider that RSSB had not yet satisfactorily addressed the recommendation, as they have not referred to existing research and good industry practice to identify the optimum means for promoting safe behaviour by passengers when boarding and alighting from trains and is focussing on passenger behaviour at the PTI, rather than industry understanding referred to in the recommendation.”

Update

4. RSSB sent the following information by e-mail on 20 October 2017:

An outline of the incident and Recommendation 1 was prepared by an RSSB specialist and presented to the Platform Train Interface Strategy Working Group (PTISWG). The PTISWG reviewed and endorsed the proposed response to RAIB recommendation 1. This manifested itself in the following:

Activity	Update
RED 45 DVD including a reconstruction of a trap and drag related incident	This programme, including supporting material such as a trailer, briefing notes and images, are now available on RSSB's portal, OpsWeb www.rssb.co.uk/opsweb .
Right Track: Trap and drag related articles	An article entitled 'Reducing risk at the PTI' published in Spring 2016 about the PTI risk and highlighting the West Wickham and Hayes and Harlington PTI incidents. An article on Non-Technical Skills was published in Spring 2017.
Platform Safety booklet for those responsible for safe train dispatch	RSSB launched a pocket-sized guide for people working on trains and in stations to help them understand the crucial role they can play in reducing injuries on the platform and reduce the number of accidents occurring at the platform edge. https://www.rssb.co.uk/Library/improving-industry-performance/2016-02-booklet-platform-train-interface-lend-a-helping-hand.pdf
RSSB Non-Technical Skills training course: inclusion of West Wickham as a case study	This RSSB NTS training course includes new material in the form of heat maps for the West Wickham and Hayes & Harlington incidents. These heatmaps assesses NTS demonstrated and not demonstrated.
A Good Practice Guide to integrating Non-Technical Skills into Rail Safety Critical Roles: inclusion of a West Wickham case study	While the original guide is still useful, particularly for companies who are at the outset of their NTS journey, this RSSB guide provides more practical guidance, learning from other companies or industries and references up to date research. A key aim of this guide is to be practical and focused around key stages of NTS integration, namely: planning the integration, identifying the relevant NTS, integrating NTS into selection, training NTS, measuring NTS and finally reviewing the effectiveness of the programme. This guide is supported by the on-line RSSB NTS toolkit, https://www.rssb.co.uk/improving-industry-performance/human-factors/non-technical-skills
T1064 Developing tools to extend non-technical skills to non-driver roles:	The aim of this project is to map non-technical skills (NTS) to non-driver operational roles to support the relevance and engagement of the training to other safety critical, operational roles such as dispatch staff. NTS guidance, materials and case studies will help companies to improve the safety of the rail system through safety critical roles.
RSSB driver training course: inclusion of related case studies	This RSSB NTS training course includes new material in the form of heat maps for the West Wickham and Hayes & Harlington

incidents. These heatmaps assesses NTS demonstrated and not demonstrated.

Risk-based training needs analysis (RBTNA) toolkit	The risk-based training needs analysis (RBTNA) toolkit can help identify how risks associated with tasks can be managed through learning, assessment and competence management activities, while aligning with both learner and business needs. This is available from RSSB.
	https://www.rssb.co.uk/improving-industry-performance/human-factors/risk-based-training-needs-analysis-(rbtna)
Project 16-019 - To review RIS-3703-TOM Issue two – Rail Industry Standard for Passenger Train Dispatch and Platform Safety Measures:	<p>This considers train dispatch and an update to RIS-3703-TOM for 'Passenger Train dispatch and Platform Safety Measures'. Publication came in September 2017.</p> <p>The scope has now expanded to now include platform staff as well as train staff and will consider related RAIB recommendations learning from the West Wickham and Hayes & Harlington incidents.</p>

The *Lend a helping hand* campaign – trap and drag

The aim of the *Lend a helping hand* Trap and Drag campaign is to support the competence development and management of staff responsible for dispatch by raising awareness of trap and drag. By facilitating the PTI strategy in this area, RSSB is focusing on PTI strategy communications and engagement activities to raise awareness of this risk to system users. The new Trap and Drag poster and animation have been launched and promoted. Network Rail is using the poster to support a public education campaign, as well as using the outputs at managed stations and has been used by the wider industry in training and on stations.

Opsweb promotion

Opsweb is a known portal to RSSB members and is actively used to disseminate output and good practice from cross-industry system safety risk groups. It is governed by the Train Accidents Risk Group (TARG) and administered by RSSB. TORG has dedicated Opsweb communications activities planned for 2017 after the portal's refresh in July. Additionally, the PTI strategy communicates the availability and benefit of Opsweb as part of its communications and engagement workstream.

Rail Industry Standard for Passenger Train Dispatch and Platform Safety Measures (RIS-3703-TOM)

We said we would expand the scope of RIS-3703-TOM (Rail Industry Standard for Passenger Train Dispatch and Platform Safety Measures) explicitly to include platform staff as well as train staff.

This is addressed as detailed below:

3.2 The dispatch corridor

3.2.1 Staff involved in the train dispatch process shall be provided with a view that enables them to observe the train dispatch corridor to:

a) Monitor passenger behaviour on the platform. The types of behaviours that may increase risk during

dispatch can be found in *Appendix L Staff Training and Assessment* on page 66.

b) Determine nothing and/or no-one has fallen onto the track or is trapped by the train doors.

c) Where practicable, monitor all train doors during the door closing process.

d) Determine that all doors are securely closed and the train can safely depart from the platform.

G 3.2.5 The ability of all staff involved in the train dispatch process to view all the train doors for which they are responsible for observing during the door closing process, allows staff to identify if anything or anyone has become trapped in the train doors. If anything or anyone does become trapped within the train doors, this view would allow staff involved in train dispatch to stop the train dispatch process and only restart the process when it is safe to do so. This view also enables staff involved in the train dispatch process to ensure that all train doors are closed prior to the train departing the platform.

G 3.2.7 Staff responsible for train dispatch are to be provided with a view of all the train doors for which they are responsible for observing during the door closing process.

G 3.3.7 When deciding on train dispatch modes and associated equipment, the following factors could affect which mode is used:

f) The ability of all staff involved in the train dispatch procedure to observe all train doors during the door closing process.

G 3.4.5 Specific emphasis within the dispatch plan is to be placed on monitoring during the door close process and during train departure. Such processes are to be designed to mitigate the risk from staff involved in the train dispatch process failing to observe a person falling between the platform and the train, a person trapped in the doors or any other potentially dangerous occurrences taking place.

The amended RIS – issue 3 – was published on 2 September 2017. It may be found here: <https://www.rspb.co.uk/rgs/standards/RIS-3703-TOM%20Iss%203.pdf>

With this development, we consider the recommendation to be closed.

Previously reported to RAIB

Recommendation 1

The intent of this recommendation is to improve the rail industry's understanding of passenger behaviour when boarding and alighting from trains and to identify the best methods and technology to promote safe behaviour.

RSSB, in consultation with the industry, and involving due industry process, should consider consolidating the findings from existing research and good industry practice, and undertaking new research as necessary to identify the optimum means for promoting safe behaviour by passengers when boarding and alighting from trains

ORR decision

1. RSSB is carrying out three coordinated pieces of work in relation to this recommendation, with the aim of improving passenger understanding of trap and drag incidents (Lend a Helping Hand); changes to industry guidance to improve the identification and mitigation of undesirable passenger behaviour at the PTI (RIS-3703-TOM); and improvements to the sharing of good practice across the industry (Opsweb).
2. We consider that RSSB have not yet satisfactorily addressed the recommendation, as they have not referred to existing research and good industry practice to identify the optimum means for promoting safe behaviour by passengers when boarding and alighting from trains and is focussing on passenger behaviour at the PTI, rather than industry understanding referred to in the recommendation.
3. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, RSSB has:
 - taken the recommendation into consideration; and
 - is taking action to implement it, but ORR has yet to be provided with a timebound plan.

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

4. On 29 September 2017 RSSB provided the following initial response:

On 19 July 2016, RSSB presented a paper to the Platform Train Interface Strategy Working Group (PTISWG), which suggested that the recommendation be accepted and addressed in the following ways:

 - The [Lend a Helping Hand](#) campaign could be used to help passengers understand how trap and drag events occur, the consequences of such events and the behaviour they should exhibit to safely board and alight.

In addition, it was suggested that consideration be given to moving beyond posters to additional ways of influencing passenger behaviour.

- *The Rail Industry Standard for Passenger Train Dispatch and Platform Safety Measures ([RIS-3703-TOM](#)) could be amended to include guidance on spotting undesirable passenger behaviours at the PTI and methods operators can employ to influence passenger behaviour and promote safe boarding and alighting.*
- *The PTI [Opsweb](#) site could be used to aid the collation of rail industry good practice, along with relevant information from other sectors (eg water, fire and driving safety etc.). This will further aid the promotion of this important area.*

The paper was approved by PTISWG. An update on progress for each workstream is provided below:

Activity	Update	Status
<i>Trap and Drag Lend a Helping Campaign</i>	<i>A new trap and drag poster and animation has been made available via OpsWeb and will be used by Network Rail to support their public education campaign.</i> <i>Further activities are planned. Including collaborating with a campaign ambassador who has been a victim of trap and drag.</i>	<i>Underway</i>
<i>Project 16-019: RIS-3703-TOM</i>	<i>This considers train dispatch and will likely involve a change to Rulebook module GERT8000-SS1 and an update to RIS-3703-TOM for 'Passenger Train dispatch and Platform Safety Measures'. Publication is expected in 2017.</i> <i>The scope has now expanded to now include platform staff as well as train staff and will consider related RAIB recommendations.</i>	<i>Underway</i>
<i>PTI Opsweb site - Collation of good practice to promote</i>	<i>Updated and dedicated pages on the new OpsWeb portal is</i>	<i>Complete</i>

<i>safe behaviour by passengers when boarding and alighting</i>	<i>available. PTI Strategy outputs (tools, guides, good practice etc.) are located here to support industry in managing the PTI risk.</i>	
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5. ORR wrote back to RSSB on 27 October 2016 with questions about each of the three workstreams, to which they responded on 24 November. ORR's questions and the RSSB responses are set out below:

Lend a helping hand

What are the aims and objectives of the Lend a Helping Hand campaign? How do RSSB think it will address the risk of passengers becoming trapped in train doors?

The aim of the Lend a helping hand Trap and Drag campaign is to support the competence development and management of staff responsible for dispatch by raising awareness of trap and drag. By facilitating the PTI strategy in this area, RSSB is focusing on PTI strategy communications and engagement activities to raise awareness of this risk to system users. The new Trap and Drag poster and animation have been launched and promoted. Network Rail is using the poster to support a public education campaign, as well as using the outputs at managed stations and has been used by the wider industry in training and on stations. A Trap and Drag survivor is being sought to be an ambassador for the risk area in planned related Lend a helping hand campaign in the first quarter of 2017.

RIS-3703-TOM

Can you provide some more detail about the specific module of rule book GERT8000-SS1 under review, the changes being considered and the timescales for doing this work.

The RIS is to be revised to incorporate the learning from RAIB's investigation into the West Wickham and the Hayes and Harlington accidents, as well as other similar accidents. The scope of the review will include all staff involved in train dispatch, as it is perceived that the document is targeted at infrastructure managers and station staff involved in train dispatch. The requirements in the RIS will be written in a way which prevents doubt or misunderstanding for those who wish to apply the requirements for their train dispatch procedures.

RSSB is finalising the draft RIS-3703-TOM and supporting documents, for the 9 May TOM SC pre-consultation meeting. Publication is scheduled now for December 2017.

Opsweb

What do RSSB do to promote the availability of Opsweb and the information it contains to industry? What promotional activity do you undertake when new information is available on OpsWeb?

Opsweb is a known portal to RSSB members and is actively used to disseminate output and good practice from cross-industry system safety risk groups. It is governed by the Train Operations Risk Group (TORG) and administered by RSSB. TORG has dedicated Opsweb communications activities planned for 2017 after the portal's refresh in July. Additionally, the PTI strategy communicates the availability and benefit of Opsweb as part of its communications and engagement workstream.