

Oliver Stewart
RAIB Recommendation Handling Manager



8 August 2022

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

Dear Andy,

RAIB Report: Class investigation into factors affecting safety-critical human performance in signalling operations on the national network

I write to provide an update¹ on the action taken in respect of recommendation 2 addressed to ORR in the above report, published on 12 May 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 2 is **'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 has become inaccurate, in which case I will write to you again.

We will publish this response on the ORR website on xx August 2022.

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 2

The intent of this recommendation is to optimise the working environment of signallers by ensuring that any changes impacting on their tasks, processes or equipment, take account of their views and experience, through involving them in the change management process.

Network Rail should review its processes for incorporating a user- centred approach into any changes that have the potential to affect signallers' work. This review should include Network Rail's standard relating to ergonomic design, to determine whether its scope is appropriately defined, and whether it is being properly complied with. Network Rail should then implement any necessary changes to address the relevant factor in this investigation

ORR decision

1. Network Rail has updated the forms referenced in the standard relating to engineering assurance arrangements for ergonomics within design and development projects (NR/L2/ERG/24020). These updates provide a mechanism for the Ergonomics team to check for operations engagement and endorsement throughout the lifecycle of a project.
2. We challenged Network Rail to consider an appropriate degree of post-implementation assurance about effective adoption of the changes to the standard. This will be done by the ergonomics team carrying out a compliance check of all form submissions from operational teams.
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 implement it

Status: Implemented.

Previously reported to RAIB

4. On 31 March 2021 ORR reported the following:

Network Rail have responded positively to the recommendation, although resourcing may be an issue and it is not clear what drivers other than the RAIB recommendation have influenced the development of the work Network Rail have chosen to do.

When we meet with Network Rail to discuss the recommendations we will discuss the scope and rational of the work being done and also ask for an update one the milestones so far completed.

Update

5. Network Rail have sent the following closure statement dated 1 May 2022:



[N201-05] Safety
Critical Human Perform

Previously reported to RAIB

Recommendation 2

The intent of this recommendation is to optimise the working environment of signallers by ensuring that any changes impacting on their tasks, processes or equipment, take account of their views and experience, through involving them in the change management process.

Network Rail should review its processes for incorporating a user-centred approach into any changes that have the potential to affect signallers' work. This review should include Network Rail's standard relating to ergonomic design, to determine whether its scope is appropriately defined, and whether it is being properly complied with. Network Rail should then implement any necessary changes to address the relevant factor in this investigation

ORR decision

1. Network Rail have responded positively to the recommendation, although resourcing may be an issue and it is not clear what drivers other than the RAIB recommendation have influenced the development of the work Network Rail have chosen to do.
2. When we meet with Network Rail to discuss the recommendations we will discuss the scope and rational of the work being done and also ask for an update on the milestones so far completed.
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
 - 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

4. On 22 August 2020 Network Rail provided the following initial response:

Network Rail will review current standards, requirements and processes to evaluate the extent to which signallers are involved in change management processes, propose changes where deemed necessary and implement those changes as follows:

1. Develop and agree detailed plan for the work [5 October 2020]
 - a. *Draft a position statement that defines the scope of the issues to be addressed, explains the current governance processes and documents the risks being managed.*

- b. Deliver a programme plan with a schedule of activities, deliverables and resourcing requirements for agreement by the Head of Ergonomics.*
- 2. Identify the need for any improvements to current ergonomics design governance practices [31 December 2020]*
 - a. Review a sample of capital delivery projects (including those mentioned in the report) to identify issues resulting from:
 - i. a lack of compliance to ergonomics standards, or*
 - ii. constraints imposed by other discipline standards/practices, or*
 - iii. factors other than standards coverage (e.g. project or supplier quality management, contractual constraints affecting supplier input, signalling staff release or engagement, etc.).**
 - b. Review the processes for managing changes to signallers' work resulting from wider factors, such as local improvements or activities resulting from incidents and investigations. This work will consider lessons from learning point 1.*
 - c. Review the processes applied to user interface designs resulting from signalling principle and standards changes against published best practice.*
 - d. Document the process followed and record Risks, Assumptions, Issues, Dependencies and Opportunities (RAIDO) in a controlled log.*
- 3. Identify the need for updates to existing standards and requirements, or for the introduction of new guidance [31 March 2021]*
 - a. Review NR ergonomics standards and technical requirements to identify any gaps in scope.*
 - b. Review additional supporting and complimentary NR standards and controlled processes (e.g. operations and signal engineering standards etc.).*
 - c. Review requirements and processes for formal staff consultation related to signalling schemes and technologies.*
 - d. Update the RAIDO log.*
 - e. Complete a report summarising the review and any actions identified.*
- 4. Produce and consult changes to standards, if required, to close out the risks, issues and opportunities identified by the earlier work streams [31 March 2022]*
 - a. Create and agree remits for changes to identified ergonomics standards.*
 - b. Consult operations, engineering discipline and union key stakeholders on proposed changes.*
 - c. Form working group and write/agree any new requirements that are necessary to manage the risks identified.*
 - d. Complete stakeholder review and publish any required updates to the existing NR/L2/ERG/24020 standard, other ergonomics standards and/or create new ergonomics standards or guidance.*
- 5. Brief any changes to ergonomics standards and processes, as required [31 July 2022]*
 - a. Deliver internal technical and awareness briefing programme.*
 - b. Deliver technical briefings to relevant parts of supply chain.*

c. Submit closure statement and evidence.