

**Oliver Stewart**  
**RAIB Recommendation Handling Manager**



10 April 2025

Mr Andy Lewis  
Deputy Chief Inspector of Rail Accidents

Dear Andy,

**RAIB Report: Serious injury to a passenger alighting from a train at Loughborough Central station on 14 January 2023**

I write to provide an update<sup>1</sup> on the action taken in respect of recommendation 1 addressed to ORR in the above report, published on 31 October 2023.

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 1 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

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<sup>1</sup> 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 ensure that the safety management system at Great Central Railway adequately controls the risks arising from its activities, so that it incorporates industry best practice, complies with legal requirements and is updated at appropriate intervals.*

Great Central Railway should continue with the review of its safety management system with a focus on:

- developing a robust process for assessing and controlling the risks arising from its activities, and ensuring this process is well understood by the staff responsible for creating and reviewing risk assessments
- ensuring that it has a well-defined process for investigating and reporting accidents and near misses that enhances its understanding of the risks arising from its activities
- ensuring that the needs of disabled passengers and staff are reflected in their assessment of risk.

Once complete, Great Central Railway should develop a timebound plan to implement any changes identified in a sustainable and consistent manner.

## ORR decision

1. As previously reported to RAIB, GCR has reviewed its safety management system in response to this incident and recommendation. The one part of the review that had not been finalised was the procedure for reporting accidents and near misses. GCR have now finalised and communicated an updated procedure for reporting and investigating accidents and near misses.

2. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Great Central Railway has:

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

**Status: Closed.**

## Previously reported to RAIB

3. On 22 October 2024 ORR reported the following:

The Great Central Railway (GCR) has provided evidence of a review of its safety management system being underway. We have written to GCR requesting confirmation of the new risk assessment and incident reporting procedures being published and an example of a risk assessment of station platform operations. GCR expect to provide this information to ORR by November 2024.

## Update

4. On 28 October 2024 Great Central Railway provided the following update:

*The Risk Assessment Procedure has been updated and the Incident Reporting Procedure is in draft form awaiting approval*



H&S-01 Risk  
Assessment v2 Septer



Event Reporting and  
Investigation Septemt

*Passenger / train interface risk assessment for Quorn and Woodhouse station*



PTI Risk Assessment -  
Quorn - v3 4-10-24.p

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### ORR decision

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2. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Great Central Railway has:

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

**Status: Open.**

### Information in support of ORR decision

3. On 9 February 2024 Great Central Railway provided the following initial combined response on recommendations 1 & 2:

*Governance and Management of Safety and Compliance*

*To ensure that the safety management system at Great Central Railway*

adequately controls the risks arising from its activities the following actions have been taken with regards to governance and management of Safety and Compliance within the organisation:

- Devolved overall responsibility for Safety and Compliance to the General Manager at executive level, enabling the Board to have independent oversight and governance of the organisation **(Completed March 2023)**
- Appointment of a new Director, Dave Penney at Board Level, with expertise and experience on the national rail network to provide assurance and advice to the Board in SHE matters **(Completed February 2023)**
- Established the Board Sub-Committee (SHE) which meets a minimum of 3 times a year, supplemented by one to one's with the GM and HoS&C **(Completed November 2023)**
- Instigate the SaMSTAG Group to commence the safety management system review of policy documents **(Ongoing since March 2023)**
- Created a new role and appointed of a Head of Safety and Compliance (HoS&C) to ensure that in accordance with The Management of Health and Safety at Work Regulations 1999 Regulation 7 - Great Central Railway has an appointed competent person. **(Completed August 2023)**
- Created and established the Executive Leadership Team, which includes a Head of Infrastructure (appointed November 2023), a Head of Safety and Compliance (Appointed September 2023) and Chief Operating Superintendent (current vacancy covered by the GM at present) **(Initial ELT structure established July 2023)**
- Review and update the organisational structure to align with the newly created Executive Leadership Team **(Completed December 2023 and is now an ongoing activity)**
- Reviewed the Health and Safety Policy Statement **(Draft completed November 2023)**

#### Safety Management System Review

In March 2023 the SaMSTAG Group was established which initially focused on understanding the current management system, and its state with a view to identifying a list of Policy Documents that are priorities to work through. As the General Manager was recruiting and establishing a new leadership team, there was limited resource within the organisation to support this activity. Some limited progress was made however it became apparent that a re-structure of the system would be of benefit to the organisation in the longer term, and bring the Safety Management System in line with established good practise.

The newly appointed Head of Safety and Compliance commenced their role in September 2023. Following an induction period the HoS&C joined the SaMSTAG Group and reviewed the management system documents and current policy document list to:

- ▶ *Identify any additional gaps in the current list of policy documents **(Completed December 2023)***
- ▶ *Identify and add documents to the management system document list which are established as current practise but are not currently included within the Safety Management System, or are only embedded within a Policy Document as an Appendix to create a new Master Document List. **(Completed December 2023)***
- ▶ *Formulate and propose a new structure for the management system that reflects the GCR's current organisational structure and is in line with ORR guidance and current good practise and embed this into the new Master Document List. **(Completed December 2023)***
- ▶ *Establish governance arrangements for the Safety Management system which include clear accountability at Executive Leadership Team level and clarity of purpose of established consultative groups **(Draft procedure awaiting review)***
- ▶ *Create an internal auditing protocol and draft plan for 2024-2025 **(Completed January 2024 - due to be published by end of February)***
- ▶ *Create a document control procedure and associated templates to enable Departments to create and document their procedures, safe systems of work, instructions, forms and standards. **(Draft procedure awaiting review)***

*The next steps in the management system review are outlined in the attached document ORR Response Attachment 8<sup>th</sup> February 2024*

#### *Risk Management and Assessment*

*The Head of Safety and Compliance reviewed the draft Risk Management and Assessment Policy that was in development.*

*This was subsequently split as follows:*

- ▶ *a Risk Management Philosophy for developing and maintaining legal and risk registers **(Completed December 2023)***
- ▶ *A Risk Assessment Procedure and associated forms; general risk assessment, hazard list, risk assessment register template, young persons risk assessment, new and expectant mothers assessment, new proposal assessment. **(Procedure Completed January 2024 - due to be published by end of February and New Proposal Assessment form requires final development)***

*Additionally internal training has also been developed to support implementation of the new procedure. Implementation of these procedures is incorporated in the 2024-2025 Safety Plan which will be launched at a Managers meeting on 22<sup>nd</sup> February 2024. Each department will be required to create a risk assessment plan to implement, and identify staff who can support this activity, and staff who will undertake risk assessment training.*

#### *Incident Reporting and Investigation*

*At present there are two separate procedures for incident reporting and investigation. These are in the process of being consolidated and combined into one procedure. The revised consolidated procedure is also being developed to align with the implementation of HOPS. It is planned that this will be drafted by the end of February 2024 and circulated for comments. The requirements of the revised procedure, including newly introduced / revised forms are planned to be launched at the Managers meeting to be held on 22<sup>nd</sup> February 2024, with a briefing to follow to all who were not able to attend due to other commitments.*

*Currently Great Central Railway has well established practise for reporting and investigating operational incidents, which are managed via HOPS and discussed at every Operations Management Group meeting which meets on a monthly basis. It is intended that with the implementation of HOPS to the wider community, that other departments will also begin to use this system. Great Central Railway also ensures that incidents and incident trends are a standing agenda item at the Health and Safety Committee, and has begun to provide summaries of serious incident investigations and trend data to the Board for discussion.*

#### *Needs of disabled passengers*

*Following the incident on the 14<sup>th</sup> January 2024, the below actions were taken to address the immediate causes of the incident:*

- ▶ *passenger trains standard length is now 5 coaches*
- ▶ *special arrangements now apply when trains run with more than 5 coaches, alerting stationmasters to overlength trains and providing stewards in end coaches*

*Further actions were also been identified:*

- ▶ *platform obstructions have been cleared and the erection of sales and information stalls which narrow the useable platform area is very tightly controlled with a maximum of one stall allowed under the canopy at Loughborough*
- ▶ *boarding boxes have been provided at all stations and on all trains*

- ▶ *public address announcements have been updated to reinforce safety messages*
  
- ▶ *train dispatch plans have been drawn up and introduced for each station; these have been reviewed and updated and are to be reviewed again in October 2024*

*Outstanding Actions are*

- ▶ *a new Train Dispatch Policy is in development, which is anticipated to be finalised at the next operations management group in February 2024*
- ▶ *commission a business wide Accessibility audit by September 2024*

*I hope that the information provided is satisfactory, and that you are confident that the actions that have been taken since January 2023 are sufficient to continue to establish significantly improved:*

- *Governance at Board and Executive level*
- *Safety Management System*
- *Implementation of Plan Do Check Act principles in line with ORR guidance*
- *Continuously improving safety culture and compliance with our legal requirements. which can be sustained in the long term. If you have any further questions regarding the information provided above, and the attached documents please do not hesitate to contact me.*