



Delay Attribution Board
Floor 8
1 Eversholt Street
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NW1 2DN

To: Gerry Leighton,
Head of Stations, Depots and
Network Code
Office of Rail and Road
One Kemble Street
London
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Tel: ☒
Email: Mark Southon @ Network Rail

cc: Richard Morris
Chairman,
Delay Attribution Board.
Michael Scarf - ORR

Date: 15th December 2015

Re-Submission of proposals for change to September 2015 Delay Attribution Guide (DAG)

Dear Gerry,

I am writing seeking approval for proposed changes to the Delay Attribution Guide in accordance with Track Access Condition B2.7.2.

Please find appended to this letter details of the following Proposal for Change:

DAB/P249 –Holding codes

- The details for each proposal consist of the following information:
- The Proposal for Change from the sponsor.
- A list of the industry responses to the Proposals for Change.
- The DAB decision and consideration of the responses from the industry.

The proposal for amendment to the Delay Attribution Guide was put out to Industry Parties for formal consultation in accordance with Track Access Condition B2.5.2. The deadline for Industry responses was 10th July 2015. A number of Industry Parties responded to the consultation process and these responses are included in this submission.

Please note that this proposal was held back until now as its go live date was always scheduled to be April 1st 2016.

All decisions made by the Board have been unanimous. A copy of the minutes of the meetings where the proposed amendments were agreed is available should you require it.

I await your advice on whether you approve the amendment proposed. Finally, in accordance with Track Access Condition B2.7.1, the Board has agreed that any changes approved by the Regulator should come into effect **1st April 2016**

Just to explain a further alteration that has been made relating to the referencing of 4.38.2(g) that should have been 4.31.2(g), as you can probably ascertain this was due to P249 being sent out to Consultation based on the April 2015 DAG as that was the DAG in use at the time.



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Whilst it was always the intention for PFC P249 to take effect from the April 2016 DAG edition we had to go to Consultation early in order to gain agreement from Industry that they accepted the whole principle and process of the Holding Code given there was a system change involved. What we did not want to occur is to sanction the system change (at considerable cost) and then have the Proposal rejected by Industry.

As with all the other changes proposed to the April 2015 DAG we submitted them all with the current references that was then entered into the DAG and then they were all completely re-numbered (per Proposal P247) – unfortunately this approach has not worked with this proposal being that it was backdated to take effect from April 2016 (post the reordering).

Therefore, as ORR correctly picked up, the reference to change 4.38.2(g) is now erroneous given the re-ordering and should in fact read 4.31.2 (g) in line with P247 (that showed section 4.38 to be renumbered 4.31). This has now been amended, with ORR agreement, in the appended document.

I have also added further explanation, in the DAB decision box, as to how the changes made by DAB alleviated Network Rail's concerns over their cited contradiction.

Should you wish to discuss any aspect of this submission or the proposals for that matter, please do not hesitate to contact me as detailed above.

Kind regards,

Mark Southon
DA Board Secretary

Mob: ☒

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|------------------------------------|-------------------------------------|
| Proposal reference Number: | DAB/P249 |
| Company Organisation | |
| Abellio Greater Anglia | |
| Arriva Trains Wales | |
| c2c Rail Ltd | |
| Chiltern Railways | |
| Colas Rail | |
| DB Regio Tyne & Wear | |
| DBSchenker | |
| Devon & Cornwall Railways | |
| Direct Rail Services * | <input checked="" type="checkbox"/> |
| East Midland Trains | |
| Eurostar International | |
| First / Keolis Transpennine | |
| First Greater Western * | |
| First Hull Trains | |
| Freightliner | |
| GB Railfreight | |
| Govia Thameslink Railway * | <input checked="" type="checkbox"/> |
| Grand Central Railway | |
| Harsco Rail | |
| Heathrow Express | |
| London Midland | |
| London Overground | |
| Merseyrail | |
| North Yorkshire Moors | |
| Northern Rail * | <input checked="" type="checkbox"/> |
| Scotrail * | <input checked="" type="checkbox"/> |
| Southeastern Railway * | <input checked="" type="checkbox"/> |
| Southern | |
| Stagecoach South West | |
| Virgin Trains (West Coast)* | <input checked="" type="checkbox"/> |
| Virgin Trains East Coast * | <input checked="" type="checkbox"/> |
| West Coast Railway | |
| XC Trains | |
| Network Rail | <input checked="" type="checkbox"/> |

DAB/P249

| Originators Reference Code / N ^o | DAB/P249 – Holding Code | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|--|------------------------------------|------|-------|--------------|----|----------------------------------|------------|----|-------------------------------|------------|----|--------------------------------|------------|----|------------------------------|-----------|----|-----------------------------|----------|----|------------------------------|----------|----|---|-----------|----|-------------------------------------|-----------|----|------------------------------------|--|------------------------------------|
| Name of the original sponsoring organisation(s) | DAB | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Exact details of the change proposed | <p>Add New Section 7D (to April 2016 DAG publication)</p> <p>SECTION 7D – HOLDING CODES</p> <p>Abbreviated Departmental Cause Code: HOLD These delay codes are Holding Codes only and not for use in final attribution. Their use should align with the incident’s original delay code to enable KPI reporting to remain consistent.</p> <table border="1"> <thead> <tr> <th>CODE</th> <th>CAUSE</th> <th>ABBREVIATION</th> </tr> </thead> <tbody> <tr> <td>DA</td> <td>Non Technical Fleet Holding Code</td> <td>HOLD NT FL</td> </tr> <tr> <td>DB</td> <td>Train Operations Holding Code</td> <td>HOLD T-OPS</td> </tr> <tr> <td>DC</td> <td>Train Crew Causes Holding Code</td> <td>HOLD T-CRW</td> </tr> <tr> <td>DD</td> <td>Technical Fleet Holding Code</td> <td>HOLD T FL</td> </tr> <tr> <td>DE</td> <td>Station Causes Holding Code</td> <td>HOLD STN</td> </tr> <tr> <td>DF</td> <td>External Causes Holding Code</td> <td>HOLD EXT</td> </tr> <tr> <td>DG</td> <td>Freight Terminal and or Yard Holding Code</td> <td>HOLD YARD</td> </tr> <tr> <td>DH</td> <td>Adhesion and or Autumn Holding Code</td> <td>HOLD AUTM</td> </tr> </tbody> </table> <p>Amend Section 7F – Remove FU Code entry</p> <p>Amend Section 7T – Remove TU Code entry</p> <p>Amend Section 4.31.2 (g) (delay code):-</p> <table border="1"> <tr> <td>g.</td> <td>Incident subject to formal inquiry</td> <td>Appropriate delay code or where agreed use Holding Code D*</td> <td>Operator of train concerned (M##*)</td> </tr> </table> | | | CODE | CAUSE | ABBREVIATION | DA | Non Technical Fleet Holding Code | HOLD NT FL | DB | Train Operations Holding Code | HOLD T-OPS | DC | Train Crew Causes Holding Code | HOLD T-CRW | DD | Technical Fleet Holding Code | HOLD T FL | DE | Station Causes Holding Code | HOLD STN | DF | External Causes Holding Code | HOLD EXT | DG | Freight Terminal and or Yard Holding Code | HOLD YARD | DH | Adhesion and or Autumn Holding Code | HOLD AUTM | g. | Incident subject to formal inquiry | Appropriate delay code or where agreed use Holding Code D* | Operator of train concerned (M##*) |
| CODE | CAUSE | ABBREVIATION | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| DA | Non Technical Fleet Holding Code | HOLD NT FL | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| DB | Train Operations Holding Code | HOLD T-OPS | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| DC | Train Crew Causes Holding Code | HOLD T-CRW | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| DD | Technical Fleet Holding Code | HOLD T FL | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| DE | Station Causes Holding Code | HOLD STN | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| DF | External Causes Holding Code | HOLD EXT | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| DG | Freight Terminal and or Yard Holding Code | HOLD YARD | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| DH | Adhesion and or Autumn Holding Code | HOLD AUTM | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| g. | Incident subject to formal inquiry | Appropriate delay code or where agreed use Holding Code D* | Operator of train concerned (M##*) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|------------------------------|--|
| | <p>Add new section on Holding Codes as 4.45 as below:-</p> <p><u>4.45 HOLDING CODES PENDING INVESTIGATIONS</u></p> <p>4.45.1 This section covers incidents where a cause is not initially apparent and that require formal investigation by RAIB, Independent or Industry Bodies (persons outside of the parties involved) and should ONLY be used as a temporary coding and NOT final resolution</p> <p>4.45.2 The use of the D* Codes (Holding Codes) should be restricted to the following circumstances:-</p> <ul style="list-style-type: none"> • Incidents that are being investigated by the RAIB • Incidents that are being investigated by an independent party • Incidents where the events have destroyed obvious evidence • Incidents that require forensic investigation • Incidents that involve a train/infrastructure interface. <ul style="list-style-type: none"> ○ OHLE/Pantograph ○ SPADs ○ Object Strikes ○ Derailments ○ 3rd Rail shoe interface • Incidents that have occurred on or directly affecting the Network within any of the criteria stated above • Incidents where Network Rail and at least one other track access party is involved within any of the above criteria stated. <p>4.45.2 When authorised to use a Holding Code the relevant D* should be utilised representing the same KPI as that of the current Delay Code mapping to ensure correct data mapping whilst the investigation is ongoing.</p> <p>4.45.3 Once the investigation is concluded the incident should be re-allocated to the relevant delay code and responsible party.</p> |
| <p>Reason for the change</p> | <p>This proposal for introducing a ‘Holding Code’ for incidents under formal or independent investigation comes in response to, and as an output from, the DAB Chairman’s Review Recommendations.</p> <p>Subsequent DAB discussions and Sub Group have also been held on this recommendation and proposal.</p> <p>A DAB sub group formulated a proposal that could work in terms of attribution and resolution purposes as well as complying with Contracts and system limitations.</p> |

The Holding Codes are defined / standalone codes that would be easily recognisable in all reporting and understood to be related to formal inquiries and thus improve engagement to resolve the issue.

By definition they are temporary codes so would not be used for final resolution.

Whilst an incident is in a Holding Code it is proposed that it will be a Dual Code so that reporting wise it will be shown and visible to both Network Rail and the affected Operator and not solely on the Operator.

Due to the dual code status, a system change will be required to prevent any incident in a Holding Code being accepted by mistake (risk reduction for both Network Rail and Operators) – this is estimated to be a cost circa £25k which DAB would fund.

The Introduction of the specific D* codes allows the removal of FU and TU codes (OI removed under a previous Pfc)

The Holding Codes introduced will map to current KPI (below) so as to keep consistency with Reporting

| | |
|------|---|
| 701A | Non-technical Fleet delays |
| 701B | Train operations |
| 701C | Traincrew causes |
| 701D | Technical Fleet delays |
| 701E | Station delays |
| 701F | External Causes (Train Operator) |
| 701G | Freight Terminal/Yard delays |
| 750 | Low Adhesion inc. Autumn (Train Operator) |

A process guide for the use of the D* delay codes will be provided as part of their introduction to ensure full understanding and correct use is applied. The DAB will also monitor their use to understand if they are being utilised as perceived and the benefits given.

Note: This Proposal for Change is being Consulted for Implementation in to the April 2016 DAG but early views are required due to the System Change needing to be agreed and implemented in time.

DAB P/249

| Company Organisation | Comments |
|---|--|
| DAMG - on behalf of the identified companies as per page 1. | The proposal was shared with DAMG, and no parties raised any concern with the group. We accept this proposal |
| Network Rail | <p>Yes, but we feel some further clarity of wording would help the proposal.</p> <p>In section 4.45 it is not clear how clauses 4.45.1 and 4.45.2 relate to each other. Is it intended that 4.45.1 is a necessary condition to use a holding code, and that 4.45.2 shows examples thereof? If so there are elements of each clause that could be construed to be contradictory.</p> <p>If <i>either</i> the circumstances in 4.45.1 or 4.45.2 can apply then this should be made clearer.</p> <p>There is a second paragraph labelled 4.45.2 that needs to be renumbered as do following paragraphs.</p> <p>Perhaps it might be helpful if some guidance on the authorisation for use of the code might be added including at what point in the resolution process might it be appropriate to D* code.</p> <p>At a suitable place in the DAG it might be helpful to include a table of Delay Codes referenced to KPI or the KPI given against the Delay Code in Section 7</p> |
| Virgin East Coast | VTEC accepts the proposal |
| DAB DECISION | <p>The Board when reaching its decision at the 14th July board meeting, considered the industry consultation feedback and the reasoning provided within the original proposal prior to considering the same for submission for ORR approval.</p> <p>The Board undertook to make non-material changes to the proposal in response to the concerns raised by the Industry. These changes are highlighted in red:</p> <p>With specific reference to the contradiction raised by NR between 4.45.1 and 4.45.2, it was agreed that combining of 4.45.1 and 4.45.2 made them one and the same section to be read as one entity whereas previously having it in two separate paragraphs gave rise to the perceived contradiction – i.e. 4.45.1 on its own suggested restricted usage that 4.45.2 allowed (e.g. SPADs or object strikes may not require the involvement of parties listed specifically in 4.45.1).</p> |