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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: Collision with buffer stops at King's Cross, 17 September 2015

I write to report¹ on the consideration given and action taken in respect of the two recommendations addressed to ORR in the above report, published on 3 August 2016.

The annex to this letter provides details in respect of each recommendation.

The status of both recommendations 1 and 2 is '**progressing**'.

ORR will advise RAIB when further information is available regarding actions being taken to address these recommendations.

We will publish this response on the ORR website on 30 August 2017.

Yours sincerely,

Oliver Stewart

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

Initial consideration by ORR

1. Both recommendations were addressed to ORR when the report was published on 3 August 2016.
2. After considering the recommendations ORR passed both recommendations to GTR/Southern asking them to consider and where appropriate act upon them and advise ORR of their conclusions. The consideration given to each recommendation is included in Annex A.
3. ORR also passed the recommendations to all other TOCs, FOCs and charter operators that employ their own staff, although our response to RAIB only considers the GTR/Southern response.

Recommendation 1

The intent of this recommendation is to reduce the risk of accidents arising from errors by inexperienced drivers.

Govia Thameslink Railway should review its arrangements for managing trainee drivers, to minimise the risks that may arise from errors associated with inexperience. The review should include consideration of:

- the stage of training at which new drivers are permitted to drive on higher-risk sections of route, such as the approach to buffer stops;
- the amount and type of training, and experience, necessary for trainee drivers to achieve competence in other circumstances in which they may need to respond quickly to events, or otherwise act in a timely manner, such as sounding the warning horn, entering occupied platforms, and drawing up to other vehicles and obstructions; and
- additional measures to enhance trainees' familiarity with train controls before first driving trains in passenger service (eg the greater use of simulators and/or practice on trains in sidings).

Govia Thameslink Railway should then put in place a programme for the implementation of any reasonably practicable measures for improvement that are identified during the review.

This recommendation may also apply to other train operating companies.

ORR decision

4. GTR/Southern have provided details of their driver training programme which if followed correctly should minimise the risks arising from a trainee's inexperience. ORR will carry out verification of procedures and review documentation to assure ourselves that the processes are embedded within the organisation and are being properly followed.

5. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, GTR/Southern has:

- taken the recommendation into consideration; and
- has provided evidence asserting that the recommendation has been implemented, that now needs to be verified by ORR

Status: Progressing

Information in support of ORR decision

6. On 20 July 2017 GTR wrote to ORR with the following information:

I can confirm that following this recommendation, we have reviewed arrangements for managing trainee drivers, and the following is in place:

Trainee drivers on Great Northern and Thameslink are introduced to traction handling during traction training module 4a which includes Drivers core traction, slow speed movements within the depot, approaching buffer stops and coupling/uncoupling. They then do module 4b introduction to driving techniques where the trainee will achieve 5 hours driving. This is in place such that prior to any main line experience, trainees will have undertaken driving towards buffer stops within yards/sidings. As above, this also includes driving towards obstructions eg when approaching train to couple up. We believe that this training given to trainee drivers prior to going out with a Driver Instructor has proven to work. The Driver Instructors are also asking trainee drivers to speak out using risk triggered commentary for combined power / brake controlled traction and on dual control units removing right hand away from driving controls as well as risk commentary driving, this mitigates the risk to as low as reasonable.

On the Southern side of the business we have also made the trainees experience training more robust. During their first main line experience, the normal driver will drive and the trainee will sit on the secondmans side asking questions and observing. Then a little further in their training after simulator and yard driving has been completed they will be able to drive.

After Focus Point 2, around 7 weeks into their training, and achieving a standard of underpinning knowledge, they are given an orange cab pass, which allows them to drive with a DI before their main 225 hours practical handling.

As part of the new Driver Learning Programme that was introduced onto the GN/TL in January 2017 module's 3& 4 of the programme involve the trainee approaching buffer stops using the simulators, to introduce trainees into the risks.

7. Following a review of the response and discussions with GTR, the following update was provided on 11 August 2017:

In respect of recommendation 1, you commented that driving towards buffer stops in sidings is not the same as driving towards buffer stops at a busy London terminus with the various distractions that involves. As I explained, we fully accept that point, although we remain of the view that any driving towards buffers in either a yard/siding, or on a simulator, is still relevant preparation prior to driving towards buffer stops in passenger service.

However, what was perhaps not explained fully, is the amount of training that a trainee will have received prior to actually driving a train with an instructor, and the protections that have been put in place in terms of the driver instructor actions when allowing the trainee to undertake this task for the first few occasions. Before the DI considers allowing the trainee to undertake this activity, he/she needs to be assured that the level of competency reached allows higher risk activities to be undertaken.

All drivers joining GTR require traction and route training, which encompasses practical driving skills. Specific assessments are conducted in the training school prior to taking the controls of a train that include time on a simulator. Traction training includes familiarity with driving cab design and controls. The trainee will therefore have had numerous occasions/experience, under instruction, of applying the train brake, both in a simulator, and practically on a train, prior to the first approach to buffer stops.

Risks from such movements towards buffer stops are also covered through guidance and instructions in the 'Professional Driving Policy' which is included as part of both the training, and the competency management system, and of course equally applies to Dis as well as trainees.

Some units have an 'emergency stop plunger' accessible to the Driver Instructor on either/both (dependent on unit) the driver and secondmans side. Dependent on the trainees' level of

experience and competency reached, the DI should be positioned either directly behind the trainee on the driver side, or on the secondmans side, with the ability to either take immediate control, or to apply the emergency stop button should it be necessary to do so. A specific notice to this effect was issued immediately after the collision, and further specific briefing has been actioned following discussion at our Safety Board, for Driver Instructors to position themselves in such a way that they can take immediate control of the train or press the emergency stop plunger.

Recommendation 2

The intent of this recommendation is to improve the quality of the training given to new drivers by driver instructors on GTR, to reduce the risk of accidents and incidents occurring during training.

Govia Thameslink Railway should review the selection, training and management of its driver instructors, to improve the quality of training delivered to drivers. The review should draw on the guidance in RSSB publication RS/100 'Good practice guide on competence development' and ORR publication RSP1 'Developing and maintaining staff competence', and include:

- the criteria for selection of individuals to act as driver instructors;
- the training given to driver instructors on methods of teaching, the supervision and mentoring of trainees, and development of non- technical skills; and
- how the competence of driver instructors is assessed, with particular reference to the ability to teach, and possible techniques for assessment, including assessment from the driving seat.

The management arrangements should be updated with relevant findings from this review.

This recommendation may also apply to other train operating companies.

ORR decision

8. GTR/Southern have outlined the processes they have in place for recruiting, training and maintaining the competence of Driver Instructors. ORR will carry out assurance work to satisfy ourselves that the procedures GTR/Southern have in place are appropriate or if any further development of the process is necessary.

9. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, GTR/Southern has:

- taken the recommendation into consideration; and
- has provided evidence asserting that the recommendation has been implemented, that now needs to be verified by ORR

Status: Progressing

Information in support of ORR decision

10. On 20 July 2017 GTR wrote to ORR with the following information:

We have undertaken a review of the role of the Driver Instructor and the selection, recruitment, training and ongoing competence briefing going forward as part of a driver resilience project group.

The intention of this, as per the recommendation, was to focus on the selection and training process, as well as continuous support and ongoing briefing of Driver Instructors.

The role of Driver Instructor (DI) is advertised, then those selected attend an assessment process which consists of candidates preparing a 10 minute presentation, which is then followed with an interview with a structured format. Successful applicants then attend a five day course delivered internally on the roles & responsibilities of a DI, including Standards (CMS) Driver Training SMS, and with the inclusion of an externally delivered Coaching skills course. Also included in the DI training is non-technical skills and our own Personal Protection Strategy (PPS) which covers situational awareness.

Current TL/GN Driver Instructors are in the process of receiving a one day briefing on the new Driver Learning Programme (DLP) course (referred to in the response to recommendation 1 above), and are refreshed on situational awareness behaviours in the cab environment.

On the Southern side, DI's are currently receiving a similar one-day re-brief on Saturdays (normally six per week).

We are also introducing a new role of Driver Instructor Development Manager (DIDM), which is being recruited for now. The DIDM's role will be responsible for monitoring Driver Instructors competence when accompanied by a Trainee Driver and to up-skill the DI team, via six monthly briefing days, newsletters targeting key risks and skills areas such as non-technical skills, situational awareness, and the personal protection strategy.

11. Following a review of the response and discussions with GTR, the following update was provided on 11 August 2017:

In respect of recommendation 2, the selection process for Dis was explained in my previous response. However what was perhaps not made clear was that any prospective DI has to have completed at least 3 years main line driving, and have a safety record that does not fall into a high risk category. They also have to attain a Level 2 coaching qualification in order to undertake the role.

Also in addition to the normal assessment cycle that applies to drivers, instructors undergo a verification assessment to confirm the non-technical skills required. This will take the form of a Competency Assessor either:

- *observing the DI undertaking training activity with a trainee, or*
- *the Competency Assessor driving the train acting in the role of the trainee, such that the DI approach and interaction can be assessed.*

Any DI that gives cause for concern during the verification will have a development plan agreed to improve their skills. Should a DI have safety incident(s) that give rise for concern, this will be reviewed and a development plan put in place, or ultimately they will have their DI status reviewed which

may result in removal of said status on a temporary or permanent basis, which has indeed happened on occasion.

It should also be noted that the operational trainers involved in new driver training have coaching and training qualifications and are subject to a similar verification process to that of Dis including classroom and practical assessment.