

**Chris O'Doherty**  
**RAIB Relationship and Recommendation Handling**  
**Manager**

Telephone: 0845 301 3356  
email: [chris.o'doherty@orr.gsi.gov.uk](mailto:chris.o'doherty@orr.gsi.gov.uk)

17 July 2012

Ms Carolyn Griffiths  
Chief Inspector of Rail Accidents  
Rail Accident Investigation Branch  
Block A, 2nd Floor  
Dukes Court  
Dukes Street  
Woking GU21 5BH

Dear Carolyn

### **Kirklees Light Railway**

I write to report on the recommendations addressed to ORR in the above report, published on 13 March 2012.

The annex to this letter provides details of the consideration given/action taken in respect of each recommendation where recommendation 2 has been implemented<sup>1</sup> and action is being taken to implement recommendation 1<sup>2</sup>.

We do not propose to take any further action in respect of these recommendations unless we become aware that any of the information provided becomes inaccurate, in which case I will write to you again<sup>3</sup>.

We expect to publish this response on the ORR website Tuesday 24 July 2012. Any comments you have would be appreciated by Monday 23 July 2012.

Yours Sincerely

Chris O'Doherty



INVESTOR IN PEOPLE

---

<sup>1</sup> In accordance with Regulation 12(2)(b)(i)

<sup>2</sup> In accordance with Regulation 12(2)(b)(ii)

<sup>3</sup> In accordance with Regulation 12(2)(c)



## Initial consideration

1. Both recommendations contained in the report were addressed to ORR when RAIB published the report on 13 March 2012.
2. After considering the report and recommendations ORR passed both recommendations to Kirklees Light Railway asking it to consider and where appropriate act upon them and advise ORR of its conclusions. The consideration given to each recommendation is described below.
3. The RAIB report and recommendations were raised at the Heritage Railway Association (HRA) Operations & Safety Committee in April 2012. Details of the RAIB report and recommendations have been included in an edition of the HRA members monthly newsletter 'Sidelines' on 5 May 2012.

### Recommendation 1

*The purpose of this recommendation is to complete the Kirklees Light Railway Safety Management System and implement it by a defined date. This may also be applicable to other heritage railways.*

Kirklees Light Railway should, within a timescale agreed with the Office of Rail Regulation, complete and fully implement a safety management system that is comparable with good practice in the heritage sector, and relevant standards and guidance. This should include the identification of risks, determination of safety critical elements of competence and the training and assessment to deliver it. The Kirklees Light Railway should confirm that the recently-introduced training syllabus and competency arrangements are consistent with this.

### Details of steps taken or being taken to address the recommendation

4. Kirklees Light Railway in its letter dated 18 April 2012 advised ORR that:

*Following the incident and visits from RAIB and ORR last year we have looked closely at three critical areas; Competency Management, Risk Assessment and our Safety Management System.*

*In regard to Competency Management the General Manager the Operations Manager produced a specification / syllabus for the safety critical roles relating to the operation of the railway. (copy provided to ORR) The roles include Steam Locomotive Driver, Diesel Locomotive Driver, Guard and Trackside Worker. In the case of Steam locomotive driver this has been taken a step further to include a written examination to cover areas of theory and scenarios that it is not possible to test practically. It is still necessary to produce a specification for the role of Responsible Officer.*

*We have sought advice from Mr Martyn Ashworth of Heritage Traction Supplies. Mr Ashworth undertakes training and assessment as an Independent Competent Person for a number of Heritage Railways. Mr Ashworth has viewed the above specifications and made a number of recommendations which have been incorporated into the documents. Furthermore Mr Ashworth has prepared a draft rules examination which we propose to implement. Mr Ashworth is to undertake practical assessments of the general manager and operations manager in the main operations roles to ensure that they meet the standards set.*

*The above work requires incorporating into the Safety Management System.*

*A programme of identifying risks and preparing risk assessments has been put into place. This programme will be an ongoing process and is examining both the operation of the railway and the work undertaken in our workshops. The Risk Assessment process is being undertaken by both full time paid staff and volunteer staff who have experience of this type of work elsewhere. (Copies provided to ORR)*

*Some work had been undertaken to tackle the short comings of our Safety Management System prior to the incident taking place, although it had not been implemented at the time of the incident. We are continuing with this work using guidance notes from ORR and the Heritage Railway Association. As a first priority following the incident we have focused on the Competency Management and Risk Assessment issues. As this work is progressed the SMS is being revised to incorporate the above and to attend to its identified failings.*

### **Recommendation 1 Timescale and Actions**

- *Produce Responsible Officer Specification – 1 month from date of this letter.*
- *Written Examinations for Rules, Diesel Driver, Guards and Trackside Worker – To be produced and phased in over the forthcoming 12 months from date of this letter.*
- *Practical Examinations for General Manager and Operations Manager – 9<sup>th</sup> and 10<sup>th</sup> May 2012*
- *Risk Assessments – Bulk completed within 6 months of date of this letter and ongoing as required.*
- *Safety Management System – Completed within 6 months of date of this letter and ongoing amendment as required.*

### **ORR decision**

5. After reviewing all the information received from Kirklees Light Railway ORR concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Kirklees Light Railway has:

- taken the recommendation into consideration; and

- is taking action to implement it.

ORR will carry out assurance on progress with implementation of this recommendation. We will provide further information to RAIB only if an inaccuracy is found

**Status: *Kirklees Light Railway is taking action to implement the recommendation***

## **Recommendation 2**

*The purpose of this recommendation is to make clear to staff preparing locomotives which items must always be checked and provide positive indication that they have done this.*

Kirklees Light Railway should revise its locomotive preparation checklist to make clear which items must always be checked and which are dependent on the outcome of other checks.

### **Details of steps taken or being taken to address the recommendation**

6. Kirklees Light Railway in its letter dated 18 April 2012 advised ORR that:

*Following the publication of the RAIB report we have rewritten our steam locomotive inspection sheet. This is now more prescriptive and involved; it also makes it harder for a driver to simply tick the boxes. A copy of the sheet is enclosed with this letter and it was introduced into use on the 7<sup>th</sup> April.*

### **ORR decision**

7. After reviewing all the information received from Kirklees Light Railway ORR concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Kirklees Light Railway has:

- taken the recommendation into consideration; and
- taken action to implement it.

ORR does not therefore propose to take any further action unless we become aware that the information reported above is inaccurate in which case we will write to RAIB again

**Status: *Implemented***