



National Union of Rail, Maritime & Transport Workers

RMT response to the Consultation on the formalisation of the Rail Delivery Group

The National Union of Rail, Maritime and Transport Workers (RMT) welcome the opportunity to respond to the Office for Rail Regulation's consultation on the proposals for formalising the Rail Delivery Group.

The RMT is the largest of the rail unions and organises 80,000 members across all sectors of the transport industry. We negotiate on behalf of our members with some 150 employers, including all of the companies currently represented on the RDG, apart from the Association of Train Operating Companies.

In response to the ORR's plans for formalisation of the Rail Delivery Group, we submit the following observations:

- (1) RMT opposed the recommendations of the McNulty Review and are also opposed to the creation of the RDG which we believe adds another layer of bureaucracy in an industry that is already organisationally fragmented and complicated.
- (2) Although the ORR proposes to give the RDG responsibility for implementing the McNulty recommendations and any other measures it deems appropriate to cut the cost of running the railways, it will not, crucially, be accountable for the decisions it makes. By handing private interests such a key role in making policy for the railway industry, unaccompanied by the accountability that would accompany a statutory body, the government is demonstrating that they are committed to a policy of full privatisation of the railways, including infrastructure. RMT is fundamentally opposed to altering the structure of government and the regulator itself in order to accommodate private companies who will act first in the interests of their shareholders rather than the needs of the industry.
- (3) RMT also oppose the ORR's proposals to allow more powers to be ceded from government to the RDG over time. This is another indication of the long term goal of full privatisation in all areas of the national railway.

- (4) We await with interest the publication of the 'RDG articles' which will outline exactly how the RDG will be structured, funded and run. As the economic regulator for the industry, we would expect the ORR to draft these articles independently from the RDG. If the RDG are responsible for writing these constitutional articles, it could call into question the independence of a consultation on the formalisation of the RDG.
- (5) RMT is concerned that the ORR's proposals do not give railway trade unions full or 'leadership' status within the RDG's membership. This relegation to 'associate' status means that the unions representing rail workers will be excluded from RDG decisions on significant and potentially hazardous changes to the workplace and industry. It also means that the unions will only be consulted when RDG members feel that it is appropriate to do so. We also note that passenger groups (or 'representative groups' as they are referred to in the consultation document) are also relegated to associate status. This approach to passengers and the trade unions undermines the commitment to 'partnership' working that the RDG has been set up to foster as a means of delivering McNulty's proposals but would seem only apply to developments such as the 'deep alliancing' formed between Network Rail and South West Trains.
- (6) We reject the proposal to found the RDG along the same grounds as the Rail Safety and Standards Board. The industry funded RSSB is made up of TOCs, FOCs and Network Rail and the level of involvement for the trade unions is at the discretion of RSSB members. As such, we do not consider it an appropriate organisational structure to oversee either railway safety or the development of railways policy.