



GTR – Southern Railways – Driver Only Operation (DOO) – Report from the HM Chief Inspector of Railways

5 January 2017

Summary

1. The issue of safety relating to the interface between the platform and train and the safe dispatch of trains is an area of focus for the Office of Rail and Road (**ORR**) and the industry.
2. We are mindful that this particular issue of railway safety has recently generated a degree of public concern. We have set out in this report ORR's findings about GTR-Southern's proposed form of Driver-Only Operation (**DOO**) for the safe dispatch of trains and its compliance with health and safety law following a review and inspections of GTR-Southern introducing DOO on new routes. In short, ORR's view is that with suitable equipment, procedures and competent staff in place the proposed form of train dispatch intended by GTR-Southern meets legal requirements for safe operation.
3. GTR-Southern, as with all train operating companies, is responsible for ensuring it complies with health and safety legislation. This includes having the right equipment, processes and procedures in place to ensure their trains are dispatched safely at all times and to keep under review the need for any further improvements in how dispatch arrangements are undertaken, irrespective of the method of dispatch used.
4. ORR's role is to ensure that Britain's railways remain safe for passengers and provide a safe place for staff to work, and, to ensure duty holders comply with the law. We do this through reviewing proposed and existing processes and procedures and ongoing planned and spot inspections. This combination allows us to assess the robustness of plans, how these are carried out in practice and to make recommendations where appropriate. Where there is evidence of a breach of safety legislation we can, and do, take action.
5. ORR has brought the industry together to review and update its work in adopting best practice and procedures, training, and equipment in relation to the safe dispatch of

trains. This, for example, is leading to a consultation on what we and the industry see as improvements to the rule book for train drivers.

Background

6. The inspections we undertook focussed on GTR-Southern services operated by Class 377 units. An assessment was made as to whether GTR-Southern's proposals comply with current health and safety legislation. In order to do this the following aspects of GTR-Southern's operations were examined:
 - a) Scope of the proposed DOO
 - b) Roles and responsibilities of the Driver and the On Board Supervisor
 - c) The 'Change Process' that GTR-Southern adopted in relation to this change
 - d) Compliance with Industry Railway Group Standards (**RGS**), Railway Industry Standards (**RIS**) and industry good practice
 - e) Whether the arrangements were compliant with health and safety legislation
 - f) If there were any safety concerns or areas for improvement

In order to undertake the assessment the following documents were examined:

- a) DOO Station Risk Assessments
 - b) Test train documentation
 - c) Station survey results
 - d) Train dispatch risk assessments
 - e) Random samples of platform train dispatch plans
 - f) Results of the trials where the in-cab monitors stay on until the train reaches 4 mph
7. An ORR Railway Operations Specialist Inspector has undertaken site visits to verify whether the arrangements GTR-Southern has in place for introducing DOO have been carried out in practice. We carried out an inspection on the recently introduced DOO service between Horsham and Bognor Regis. Concerns raised with ORR by Union Health and Safety representatives about the quality of CCTV footage were taken into account during this inspection.

Findings

Visibility

8. GTR-Southern has run a number of test trains during the hours of darkness in order to survey the level of lighting provided at all stations where the proposed DOO trains will operate. Where any lighting deficiencies were highlighted, corrective action is planned to increase these lighting levels to at least 20 lux (the minimum standard) along the entire length of the platform as required by RGS *Interface between Station Platform, Track and Trains*. This work is on-going as not all stations meet this requirement. GTR-Southern has given us a categorical assurance that no trains will operate under DOO conditions until all stations meet the necessary lighting standards – or, where this is not immediately possible they will put in place alternative dispatch arrangements, for example station staff dispatch.
9. These test trains were also used to establish that visibility of persons including small children is achieved within the train dispatch corridor along the whole length of the platform as required by RGS *Guidance on Engineering Requirements for Dispatch of Trains from Platforms*. Where any platforms failed, lighting, foliage or other changes have been made and retests undertaken.
10. Daylight testing was also carried out. These tests were carried out using service trains as it was not practicable to get train paths during the hours required. Additional members of staff were utilised who were observed boarding and alighting from different and potentially more challenging to view doors on the train (e.g. if the exit from the station was at the front of the train, a person would alight from the train from the rearmost door).
11. Station risk assessments have been carried out by GTR-Southern as required by legislation. Following ORR examination of a number of these risk assessments, locations that suffer from overcrowding on the platforms at certain times of the day have been identified and action taken to provide additional staff during these times if the viewing corridor will be difficult for the driver to observe and carry out the train safety check.

Testing of in-cab monitors

12. GTR-Southern has carried out some research and trials into leaving the in-cab monitors on until the low speed relay operates at approx. 4mph. This is the accepted practice on London Overground 378 units since approximately 2014. There are clear safety benefits compared to the current method of operation using a Conductor because the driver will be able to monitor the Platform Train Interface for a short distance as the train leaves the station. The Conductor is unable to do this unless

dispatching the train from a driving cab. GTR-Southern has carried out a risk assessment with regards to this practice and the risk of the driver having a Signal Passed at Danger (**SPAD**) whilst observing the monitors. It concluded that observing the in-cab monitors as the train departs could reduce the risk to passengers as the train departs the platform but this needs the driver to watch the screen. ORR encourages and expects drivers to co-operate with this initiative.

Inspections on newly introduced DOO routes

13. The ORR Railway Operations Specialist Inspector has carried out inspections, alongside a driver, on the Horsham to Bognor Regis route, which has recently launched DOO dispatch. These took place during day and night on 377 class trains. The inspector found that the quality of CCTV images varied but all were adequate. At no time during the journeys was it necessary for the driver to leave the driving cab in order to carry out the train safety check prior to departure. A recommendation has however been made to GTR-Southern to make improvements so that image quality is consistently high, including immediate improvement in the cleaning regime of external camera lenses. The inspector also noted that the planning and notification ahead of the route becoming DOO dispatch did not appear to be well communicated. We met with both GTR-Southern and the ASLEF Health and Safety Representatives this week and agreed a set of further actions between us. ORR will be following up with both parties on the progress on these on an ongoing basis. In addition ORR will carry out routine, spot and joint inspections with safety representatives.

Conclusions

14. GTR-Southern has been through a thorough risk assessment process as required under the Railways and Other Guided Transport Systems Regulations 2006 and the Management of Health and Safety at Work Regulations 1999 in order to identify any risks associated with the DOO of services over the new routes.
15. Industry standards, Railway Group Standards (RGS), Railway Industry Standards (RIS), are the minimum requirements that have to be met. ORR is satisfied that these requirements and those from good practice guides, in relation to DOO operation, are being adhered to.
16. Improvements have been identified; for example, GTR-Southern and Network Rail should extend the provision of CD (Close Door) and RA (Right Away) indicators on stations that are staffed, where appropriate, in order to improve train dispatch at these locations. And some of these have been highlighted as requiring completion before new DOO services are introduced.

17. Where DOO has been introduced on the Horsham to Bognor Regis line, ORR has identified that in-cab CCTV images are adequate across the route but has recommended improvements. ORR has also identified that it would clearly expect GTR-Southern to better plan for and notify staff and ensure their competency ahead of introducing DOO dispatch on routes. We will be following up on progress of this with ASLEF and GTR-Southern on an ongoing basis.
18. ORR is satisfied that with suitable equipment, procedures and competent staff in place the proposed form of train dispatch intended by GTR-Southern, meets legal requirements and can be operated safely. The onus on all duty holders is to continuously improve safety and therefore we will work with all parties to ensure they are striving for ever-safer methods of train operation, including regarding the technology that is available as part of DOO. As the safety regulator we will continue our inspections and we will not hesitate to take action if we have evidence there is a breach of health and safety legislation.



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