Mr Andrew Hall
Deputy Chief Inspector of Rail Accidents
Cullen House
Berkshire Copse Rd
Aldershot
Hampshire GU11 2HP

Dear Andrew,

Collision between a train and tractor at Hockham Road user worked crossing, near Thetford, 10 April 2016

I write to report on the consideration given and action taken in respect of the three recommendations addressed to ORR in the above report, published on 14 March 2017.

The annex to this letter provides details in respect of each recommendation. The status of recommendations 1 is ‘insufficient response’; the status of recommendations 2 and 3 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 13 March 2018.

Yours sincerely,

Oliver Stewart

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

1. All 3 recommendations were addressed to ORR when the report was published on 14 March 2017.

2. After considering the recommendations ORR passed all 3 recommendations to Network Rail asking them to consider and where appropriate act upon them and advise ORR of its conclusions. The consideration given to each recommendation is included below.

3. This annex identifies the correspondence with end implementers on which ORR’s decision has been based.

Recommendation 1

Recognising Networks Rail’s stated intention to reduce its reliance on telephone protection at user worked crossings (paragraph 136), the intent of this recommendation is to reduce the risk of signaller error at user worked crossings.

Network Rail should undertake a review of its measures for the protection of user worked crossings with the objective of identifying means of reducing the likelihood that an accident will be caused by signaller error. Options for consideration should include:

- improved information for signallers (including consideration of ways of better enabling signallers to judge the time needed for a movement over a crossing and the time available before a train arrives at a level crossing);
- increased use of automatic warning systems; and
- closure of UWCs or their replacement by automatic crossings.

The review should also identify criteria for the prioritisation of improvements taking into account both risk and the opportunities presented by planned signalling upgrades. The findings of the review should be incorporated into Network Rail’s level crossing strategy and the standards used to prepare specifications for new signalling schemes.

ORR decision

4. The Network Rail response only considers the option of providing improved information for signallers. ORR has asked Network Rail to address all the options identified in the recommendation and provide us with information on any measures being taken to make increased use of automatic warning systems and closure or replacement of UWCs.

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

- taken the recommendation into consideration
- but has not provided a sufficient response setting out how each part of the recommendation will be delivered.
**Status: Insufficient response.** ORR will advise RAIB when further information is available regarding actions being taken to address this recommendation.

**Information in support of ORR decision**

6. Network Rail provided the following initial response on 30 January 2018:

*Network Rail has evaluated its internal formal investigations for Hockham Road and Dock Lane in conjunction with those of recommendations from RAIB and has taken the decision to adopt an effective joint action plan to address those with overlapping criteria. Accordingly, the plan below will target the closure of RAIB recommendations Hockham Road Rec 1 and Dock Lane Rec 1 and the internal investigation recommendation, Hockham Road A9.6.*

The action plan is as follows:

1. **The review criteria for the recommendation will include:**
   
   a. Investigate, develop and propose, potential solution(s);
      
      i. decision making processes, linked to;
      
      ii. how many calls a signaller takes;
      
      iii. error rates proportionate to risk;
      
      iv. Signallers ability to monitor train location (i.e. long signal sections)
      
      v. potential internal and external factors that lead to errors.
   
   b. Liaise and consult with appropriate stakeholders from RSSB, NR Ergonomics, Level Crossing Team, Route Businesses, Head of Operations Principles and Standards, Operations Delivery Manager(s) / HoRSHE*(s) / Operations Manager(s) / Signaller(s) effected / Trade Union Health and Safety Representative(s);

2. **Evaluate the proposal(s) and the need to trial them with stakeholders or go live as appropriate.**

   a. Develop one solution that is appropriate that conforms to ALARP;
   
   b. Develop a risk based criteria with appropriate measures of success;
   
   c. Trial or go live as agreed;
   
   d. Monitor and review the solution.

3. A report making reference to the findings and evidence will be produced to close out the recommendation. This will include as appropriate
recommendations for change to the Rule Book industry and Network Rail standards or other actions as appropriate.

Note: After each stage an update will be provided. Any changes to the actions or review criteria will be noted with the reasons for this.

Timescales:

1. The development of proposals (from step i above) will be completed by the end of April 2018;

2. Evaluate the proposal(s), agree one to take forward and the need to trial or go live with stakeholders by the end of June 2018;

3. All actions and close out report to be completed by the end of October 2018.

4. If further action is required then an extension to complete will be submitted.

Recommendation 2

The intent of this recommendation is to improve the way in which new equipment is introduced to existing signalling locations, to reduce the risk of operating errors caused by inadequate competence.

Network Rail should review and improve its processes for introducing signalling equipment where the user interface has significantly altered (eg the replacement of NX panels with VDU-based workstations). This review should include the selection, training and management of staff who operate the new equipment, so that they achieve and maintain an appropriate level of competence.

ORR decision

7. In their response to the recommendation, Network Rail have focused on the staff competency and management of staff aspect of the introduction of new signalling equipment. They have not mentioned the selection of staff.

8. ORR agree that this is an important factor, but Network Rail need to address the much wider scope of the recommendation which concerns reviewing and improving processes for introducing signalling equipment where the user interface has significantly altered. We have written to Network Rail asking them to address this wider issue.

9. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Network Rail has:
   - taken the recommendation into consideration
   - but has not provided a sufficient response setting out how each part of the recommendation will be delivered.
Status: Progressing. ORR will advise RAIB when further information is available regarding actions being taken to address this recommendation.

Information in support of ORR decision

10. Network Rail provided the following initial response on 30 January 2018:

The initial requirement to train staff on new equipment is mandated through the application of the CDM regulations and the provision of training. This is delivered as part of the project with work packages in the GRIP process.

The content of the training is managed through the Operations Capability Development Group for larger schemes and the Route System Review Panel for smaller schemes. This involves the presentation of training material and the outputs from pilot courses to demonstrate that the training is appropriate and meets the needs of the Signaller.

The training is only on the use of the equipment and does not cover their competence to operate signalling equipment. The signalling competence is attained through following the National Operating Procedure 2-06.

Each signalling location or panel or workstation will have a Signal box Training Plan. The content and production of the Training Plans are covered in National Operating Procedure 2-17. The procedure also covers the review of the changing plan annually or when changes are made to the location. This makes sure that those starting at a location after the equipment has gone live will receive training on the current functionality. The additional information for the Training Plan will be taken from the conversion training material.

The training is then managed as business as usual activities through National Operating Procedure 2-06. This includes observation of the equipment being operated and an Annual Competence Conversation. During the Annual Competence Conversation the line manager and signaller or SSM will review all their evidence in terms of operating signalling equipment and the use of the systems at each location.

The technical training is supported by a non-technical skills element which covers the ability of a signaller to work within their environment.

To assist with the training a signalling simulation standard has been developed to set the required specification to deliver the training needed. NR/L2/OPS/254 Module 01 Signalling Simulation Operational Specification provides the required functionality.

At any stage in the process it may be identified that a signaller is not meeting the required standard. There are mechanisms to deal with this in the processes above such as a Development Action Plan being raised or the signaller being placed onto the Additional Monitoring & Support process. Ultimately it is the line managers decision to determine if someone is competent and is there are any doubts there are processes in place to bring them up to the correct level of competence.
There is a mechanism to deliver the training equipment and materials are in place where signalling equipment interfaces have significantly changed.

The process to achieve and maintain competence is in place and meets the intent of this recommendation to cover selection and training. This also covers the requirement to manage their ongoing competence so they are able to maintain an appropriate level of competence.

Recommendation 3

_The intent of this recommendation is to improve the competence of Signalling Shift Managers._

Network Rail should review the competence management arrangements for Signalling Shift Managers, to provide assurance that they are competent to use all the equipment that they may be required to operate. This review should include consideration of the amount of time on shift and the frequency of operation required to maintain familiarity with the different types of equipment

**ORR decision**

11. In response to this recommendation, Network Rail carried out a review of Operational Manual procedure 4-20. We have asked Network Rail for information on how the review was carried out and how the findings were used to develop the programme of work detailed in the response to the recommendation. This information will help us reach a decision on if the recommendation has been addressed.

12. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Network Rail has:

- taken the recommendation into consideration; and
- is taking action to implement it, but ORR has yet to be provided with a timebound plan.

**Status: Progressing.** ORR will advise RAIB when further information is available regarding actions being taken to address this recommendation.

**Information in support of ORR decision**

13. Network Rail provided the following initial response on 30 January 2018:

_A review of Operational Manual procedure 4-20 (the overarching Competence to Operate Signalling Equipment) has been undertaken._

_The review included the competence management arrangements for staff that do not operate signalling equipment as a full time role, including Signalling Shift Managers, to provide assurance that they are competent to use all the equipment that they may be required to operate._
The review considered the amount of time on shift and the frequency of operation required to maintain familiarity with the different types of equipment and concluded that the time needed at the location would be determined locally and not made prescriptive in the standard.

The criterion of the assessment is the complexity of the work station, the complexity of the train service and the complexity of the railway layout. There is scope for additional simulation but ultimately this is covered at the annual competence conversation. It is not a generic ‘one size fits all’ assessment form; it needs to be determined for each workstation by the local manager who understands the subtleties of the location.

The assessment is recorded in the training plan and is assured through the annual competence conversation, self-assurance and the functions audit programme.

The process was reissued in June 2017 with a compliance date of 30 June 2017.