

**Oliver Stewart**  
**RAIB Recommendation Handling Manager**



29 November 2024

Mr Andy Lewis  
Deputy Chief Inspector of Rail Accidents

Dear Andy,

**RAIB Report: Collision between a train and a hand trolley at Challow,  
Oxfordshire on 21 October 2021**

I write to provide an update<sup>1</sup> on the action taken in respect of recommendations 1 & 5 addressed to ORR in the above report, published on 13 October 2022.

The annex to this letter provides details of actions taken in response to the recommendations and the status decided by ORR. The status of recommendations 1 & 5 is '**Closed**'.

We do not propose to take any further action in respect of the recommendations, unless we become aware that any of the information provided has become inaccurate, in which case I will write to you again.

We will publish this response on the ORR website.

Yours sincerely,

Oliver Stewart

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

## Recommendation 1

*The intent of this recommendation is to make shorter-term changes to the existing line clear verification process to reduce the likelihood of vehicles such as hand trolleys or rail skates being left on the track when the line is handed back after engineering work.*

Network Rail should examine the safeguards and controls in the existing line clear verification process to establish what improvements could be made. This should build on any relevant existing work that has already been undertaken by Network Rail and should specifically consider:

- why the current vehicle management forms are not being used by some hand trolley and rail skate users
- whether the overall risk of using hand trolleys and rail skates could be reduced through a consistent application of an improved line clear verification process across its infrastructure, rather than limiting its use to only those areas that use axle counters for train detection
- if the line clear verification process should be integrated with the planning processes for managing the safety of people working on or near the line.

Network Rail should then implement any changes identified to create a revised line clear verification process, clearly define when and where the revised process should be applied on its infrastructure, and brief staff on any changes that are made

## ORR decision

1. Network Rail has reviewed and revised the line clear verification (LCV) process (NR/L3/OPS/084 – Line Clear Arrangements Following Engineering Works – Line Clear Verification Process (Issue 7)) and the new version will be published December 2024 with a compliance date of December 2025.
2. Network Rail reviewed the reasons for non-use of vehicle management forms (VMF's) and concluded this was due to (a) confusion over where they should be used, (b) issues with possessions planning, (c) staff training and (d) non-availability of VMF's. As a result, VMF's now need to be used in all non-track-circuited areas (previously only axle counter areas), Weekly Operating Notice's (WON) will include a clear notice to the effect that LCV applies to the possession, and VMF forms will be included in all safe work packs.
3. Network Rail accepts that broadening the application of LCV would improve consistency. Accordingly, LCV will apply to all non-track-circuited areas instead of axle counter areas only.
4. The new standard requires possessions that involve LCV to be clearly identified in the WON. Although not integrated with trackworker safety planning, this change achieves the object of the recommendation by making it clear that the LCV process applies. Our experience with previous incidents has shown that there is no particular merit or advantage in including LCV in the 019 'safety of work on or near the line' standard.

5. As noted above, Network Rail has revised the relevant standard, with a compliance date of December 2025. We have reviewed briefing material issued by System Operator and confirmed that the revised standard contains requirements for staff to be trained and competent in the LCV process.

6. Notwithstanding the December 2025 compliance date, the recommendation has been complied with as Network Rail has examined safeguards and controls and created a revised LCV process that is designed to meet the requirements of the recommendation.

7. 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
- has taken action to close it

**Status: Closed.**

### Previously reported to RAIB

8. On 6 October 2023 reported the following:

Network Rail is conducting a revision of standard *NR/L2/RMVP/0200/P514 - Hand Controlled Trolleys* to mandate that any hand trolley placed on Network Rail infrastructure has illuminated red lights displayed in both directions at all times. We have asked Network Rail to confirm the latest position with this work.

### Update

9. On 30 October 2024 Network Rail provided the following closure statement:



[N232-14] Challow  
Recommendation 1

10. On 8 November 2024 Network Rail provided the following documents in support of their closure statement:



NR L3 OPS 084 F06 - NR L3 OPS 084 F05 - NR L3 OPS 084 F04 - NR L3 OPS 084 F03 - NR L3 OPS 084 F02 - NR L3 OPS 084 F01 - MC Vehicle Mgmt FcES Vehicle Mgmt ForES Vehicle Mgmt ForCOSS Vehicle ManagePICOP Vehicle MgmtSignaller Vehicle Man



NR L3 OPS 084 - LCV LCV Technical  
Process - ISS 7 - SH A Briefing 2024.pptx

### Recommendation 5

*The intent of this recommendation is to reduce the risk of hand trolleys or rail skates being used in an unsafe way and left on the track when the line is handed back after engineering work.*

Network Rail should review the effectiveness of its safety assurance activities relating to the use of hand trolleys. It should address any deficiencies that are identified so that the associated risks are better controlled.

### **ORR decision**

11. Network Rail accepted that there was a lack of LCV assurance. The new standard NR/L3/OPS/084 – Line Clear Arrangements Following Engineering Works – Line Clear Verification Process (Issue 7) includes a statement that assurance shall be carried out as per the engineering possession assurance process set out in NR standard NR/L2/OPS/303. This is a new standard and time will tell how well it works. However, NR has reviewed effectiveness and implemented a new standard to address deficiencies, thereby meeting the intent of the recommendation.

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
- has taken action to close it

**Status: Closed.**

### **Previously reported to RAIB**

13. On 6 October 2023 ORR reported the following:

We have arranged a meeting with Network Rail on 28 September 2023 to discuss closure of the recommendation.

### **Update**

14. On 9 July 2024 Network Rail provided the following closure statement:



[N228-15] Challow  
Rec 5 Closure.doc

## Previously reported to RAIB

### Recommendation 1

*The intent of this recommendation is to make shorter-term changes to the existing line clear verification process to reduce the likelihood of vehicles such as hand trolleys or rail skates being left on the track when the line is handed back after engineering work.*

Network Rail should examine the safeguards and controls in the existing line clear verification process to establish what improvements could be made. This should build on any relevant existing work that has already been undertaken by Network Rail and should specifically consider:

- why the current vehicle management forms are not being used by some hand trolley and rail skate users
- whether the overall risk of using hand trolleys and rail skates could be reduced through a consistent application of an improved line clear verification process across its infrastructure, rather than limiting its use to only those areas that use axle counters for train detection
- if the line clear verification process should be integrated with the planning processes for managing the safety of people working on or near the line.

Network Rail should then implement any changes identified to create a revised line clear verification process, clearly define when and where the revised process should be applied on its infrastructure, and brief staff on any changes that are made

### ORR decision

1. The first part of the Network Rail plan to address the recommendation is a revision of NR/L3/OPS/O84 (Line Clear Verification Process), which following a timescale extension, is expected by December 2023. The revision has been delayed in part to consider the impact of LCV across all types of train detection, not just axle counters. We support the approach being taken by Network Rail and will review the revised standard when it becomes available. We have also asked Network Rail if the requirements of the revised LCV standard will still be paper based or if will it be incorporated into Rail Hub.

2. 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 close it

**Status: Open.**

### Information in support of ORR decision

3. On 29 November 2022 Network Rail provided the following initial response:

### Please provide milestones with dates

The intention of this action plan is to close out the recommendation 1 from Challow (RAIB) and recommendation 13 from Twickenham (COLAS). Further consideration to the long term recommendation shall also be given.

It is clear a re-write of the 084 standard is required. This shall be completed in a working group with invites to industry and subject matter experts while also including representatives from the end users to ensure a breadth of knowledge and understanding is represented.

- Re-write of the standard to consider the points made in the recommendation.
- Proposal to apply LCV process to every possession, regardless of signalling methodology used.
- Clearer briefing material
- Assurance of briefing material
- Review how the LCV process is linked into the planning standards for work and possessions
- Review feedback on the VMFs and amend accordingly.

December 2022 - Submit remit for NR/L3/OPS/084 – Line clear verification process

January 2022 – Formulate LCV working group. Include recommendations to related standards (019, NR/L3/OPS/202 & 303)

March 2023 – Submit draft NR/L3/OPS/084 for stakeholder review

May 2023 – Finalise standard NR/L3/OPS/084 and submit for publication

June 2023 – Publication of revised NR/L3/OPS/O84 with compliance date of July 2023

### Evidence required to support closure of recommendation

4. On 16 May 2023 Network Rail provided the following timescale extension to 1 December 2023:



Challow  
recommendation 1 Exte

### Recommendation 5

*The intent of this recommendation is to reduce the risk of hand trolleys or rail skates being used in an unsafe way and left on the track when the line is handed back after engineering work.*

Network Rail should review the effectiveness of its safety assurance activities relating to the use of hand trolleys. It should address any deficiencies that are identified so that the associated risks are better controlled.

### ORR decision

5. We have arranged a meeting with Network Rail on 28 September 2023 to discuss closure of the recommendation.

6. 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 close it

**Status: Open.**

### Information in support of ORR decision

7. On 29 November 2022 Network Rail provided the following initial response:

#### Action Plan

##### Please provide milestones with dates

1. Produce a remit of all assurance activities within scope of this recommendation, covering both maintenance and operations standards and processes. 10<sup>th</sup> Dec 22
2. Conduct a review of the current use of the above assurance activities, and the quality of that assurance. 30<sup>th</sup> April 23
3. Produce a report including any improvements/recommendations. 30<sup>th</sup> May 23

Timescales needed to deliver any improvements will be determined with the report.

Noting that the assurance within the LCV standard will change over the coming months as the standard is being amended.

##### Evidence required to support closure of recommendation

Review report  
Governance of any improvement / recommendations

