

Oliver Stewart
RAIB Recommendation Handling Manager



12 February 2025

Mr Andy Lewis
Deputy Chief Inspector of Rail Accidents

Dear Andy,

RAIB Report: Collision between mobile elevating work platforms at Rochford, Essex on 25 January 2020

I write to provide an update¹ on the action taken in respect of recommendation 2 addressed to ORR in the above report, published on 28 September 2020.

The annex to this letter provides details of actions taken in response to the recommendation and the status decided by ORR. The status of recommendation 2 is **'Closed'**.

We do not propose to take any further action in respect of the recommendation, 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

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

Recommendation 2

The intent of this recommendation is to improve the operation of the Sentinel scheme so that the scheme's ability to influence safe behaviours is more effectively managed.

Network Rail, in co-operation with other participating organisations (including the National Skills Academy for Rail), should undertake a review of the way that the Sentinel scheme is managed to identify any improvements that are necessary, with particular attention to the following areas:

- a. resources, organisation and processes for managing engagement with primary sponsors in respect of investigation of incidents in which staff competence is an issue; and
- b. review how the Sentinel scheme oversees and manages the way in which training providers and primary sponsors assess the English language skills of safety critical staff whose task requires effective communication when working on the railway infrastructure.

Network Rail should then establish a programme to implement any areas of improvement identified during the review.

ORR decision

1. The recommendation focuses on investigation of incidents involving staff competence and English language skills, as well as a more general requirement to identify any necessary improvements in the Sentinel scheme.
2. In response, Network Rail together with Rail Training Assurance Scheme (RTAS – the NR entity that sets training standards) and Sentinel carried out a review of Sentinel Scheme Rules (SSR's) and made suggestions about how the aims of the recommendation could be met. Despite the mention in the recommendation, the National Skills Academy for Rail (NSAR) was not included. However, NSAR simply provide training; it makes sense for RTAS instead of NSAR to be part of the review as it is RTAS that sets training requirements, not NSAR.
3. The review resulted in recommendations aimed at improving industry understanding of Sentinel Scheme requirements, better investigation by primary sponsors, and promotion of improved English language proficiency. The review resulted in updated SSR's on the following:
 - Requirement for primary sponsors to understand the SSR's and ensure key employees are trained in SSR requirements.
 - All primary sponsors to have access to trained and competent investigators
 - SSR's on the contents and timescales of investigations which are consistent with the recommendation

- Improved SSR's on English language proficiency including pre-training checks by primary sponsors, application of the same standard in Sentinel as for UK academic institutions, use of a recognised language proficiency system, and a requirement for Sentinel trainers to report to Sentinel a breach of SSR's anyone appearing for training with insufficient English

Additionally:

- funding has been found for a temporary secondment (2024-2026) to Sentinel to assist investigation of Sponsor compliance with SSR's and improve the quality of those investigations.
- An 'integrated group' of Network Rail, Sentinel and RTAS has been set up to promote sharing of information and best practice
- Network Rail has changed the questions it asks of suppliers to better assess suppliers' ability to investigate Sentinel breaches and to assess levels of English language proficiency.

4. These actions have either been implemented or are in the process of being implemented this year. It therefore appears that the recommendation's intent – to improve the Sentinel scheme's ability to promote safe behaviours - has been met and it can be closed.

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; and
- has taken action to close it.

Status: Closed.

Previously reported to RAIB

6. On 21 September 2021 ORR reported the following:

Network Rail has carried out a review of how the Sentinel scheme is managed and has made a number of recommendations for organisations that use the scheme.

The recommendations are ambitious, and to be successful, the different organisations will have to sign up to some quite demanding provisions, such as creating additional investigation roles and committing to new timescales.

We have asked Network Rail to provide a plan with dates setting out when decisions will be made by the different parties to address the recommendations from the Network Rail review. Once we have that commitment from Network Rail we will consider if the RAIB recommendation has been implemented.

Update

7. On 21 January 2025 Network Rail provided the following closure statement and supporting documents:



[N235-13] Rochford
Rec 2.doc



[N235-13] Rochford
Rec 2 Review.docx



Sentinel Scheme
Rules - Version 5 - De

Previously reported to RAIB

Recommendation 2

The intent of this recommendation is to improve the operation of the Sentinel scheme so that the scheme's ability to influence safe behaviours is more effectively managed.

Network Rail, in co-operation with other participating organisations (including the National Skills Academy for Rail), should undertake a review of the way that the Sentinel scheme is managed to identify any improvements that are necessary, with particular attention to the following areas:

- a. resources, organisation and processes for managing engagement with primary sponsors in respect of investigation of incidents in which staff competence is an issue; and
- b. review how the Sentinel scheme oversees and manages the way in which training providers and primary sponsors assess the English language skills of safety critical staff whose task requires effective communication when working on the railway infrastructure.

Network Rail should then establish a programme to implement any areas of improvement identified during the review.

ORR decision

1. Network Rail has carried out a review of how the Sentinel scheme is managed and has made a number of recommendations for organisations that use the scheme.
2. The recommendations are ambitious, and to be successful, the different organisations will have to sign up to some quite demanding provisions, such as creating additional investigation roles and committing to new timescales.
3. We have asked Network Rail to provide a plan with dates setting out when decisions will be made by the different parties to address the recommendations from the Network Rail review. Once we have that commitment from Network Rail we will consider if the RAIB recommendation has been implemented.
4. 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 the findings of the review and next stage.

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

5. On 3 December 2020 Network Rail provided the following initial response:

Action Plan

- *Form the working group and hold monthly meetings 28 /10/2020*
- *Review of Sentinel Investigations Processes including, inputs, decision making, outputs and recommend improvements as appropriate – 30/12/2020*
- *Review current requirements on how Sponsors, Training Organisations comply with the investigations including Sentinel Scheme Rules, RTAS and recommend improvements as appropriate – 30/01/2021*
- *Review and research improved methods for sponsors and training providers to assure sufficient English language capability of a person whose role may involve safe communications 19/02/2021*
- *Review Technical Authority resource required and availability to proportionately monitor sponsor compliance with Sentinel scheme rules. 28/02/2021*
- *Complete review and findings and make recommendations as appropriate to NRRP– 28/02/2021*

Evidence required to support closure of recommendation

- Results of the review Sentinel Investigation Processes
- Results of the review of Sponsors, Training Organisations comply with the investigations
- Results of research of improved methods for sponsors and training providers to assure sufficient English language capability
- Meeting Notes
- Review report including recommendations and actions agreed at NRRP.

6. Network Rail has since provided the following update:



Rochford
Recommendation 2