

21-015 Improving the management of change in train dispatch with effective collaboration with staff affected

This business case for change has been developed to support standards committees in taking decisions related to changes to standards, it includes an assessment of the predicted impacts arising from the change.

Documents

Number	Title	Issue
RIS-3703-TOM	Passenger Train Dispatch and Platform Safety Measures	5

Superseded documents

Number	Title	Issue
RIS-3703-TOM	Passenger Train Dispatch and Platform Safety Measures	4.1

Summary

Background and change

ASLEF submitted a request for help to RSSB, requesting that guidance in RIS-3703-TOM on decisions to review, modify or implement a method of dispatch was updated to make it clear that it is good practice to involve trade unions in the process. The trade union was concerned of an increased risk to safety for driver only operation (DOO) trains at the platform train interface (PTI) when changes are made to the methods of train dispatch without consulting with affected parties.

Changes were made to the guidance in RIS-3703-TOM in two topic areas: 'Assessment responsibilities' and 'Requirement to review'. The guidance in these clauses was redrafted to make it clearer that trade union health and safety representatives are key stakeholders for a risk assessment. A new clause was also added to the 'Assessment responsibilities' topic area to explain that representatives in the assessment team should be informed of their assessment responsibilities 'with enough time' to allow them 'to make the necessary arrangements.'

Industry impact due to changes

Impact areas	Scale of impact	Estimated value £
A. Legal compliance and assurance	Low	Not proportionate to quantify
B. Health, safety and security	Low	£50,000 over five years
C. Reliability and operational performance	N/A	-
D. Design and maintenance	N/A	-
E. People, process and systems	Neutral	-
F. Environment and sustainability	N/A	-
G. Customer experience and industry reputation	N/A	-
Total value of industry opportunity =		£50,000 over five years
The standards change contribution to the total value of industry opportunity		
<input type="checkbox"/> None or low	<input checked="" type="checkbox"/> Minor but useful	<input type="checkbox"/> Moderate
		<input type="checkbox"/> Important / essential
		<input type="checkbox"/> Urgent / critical

Detail

1. What were the objectives associated with this change?

Objective 1 – Encourage better collaboration when changing train dispatch arrangements

- 1.1 ASLEF submitted a request for help to RSSB, requesting that guidance in RIS-3703-TOM on decisions to review, modify or implement a method of dispatch was updated to make clear that it is good practice to involve trade unions in the process. The trade union was concerned of an increased risk to safety for driver only operation (DOO) trains at the platform train interface (PTI) when changes are made to the methods of train dispatch without consulting with affected parties. For example, when close doors (CD) and right away (RA) indicators are removed at stations that were formerly staffed, and self-dispatch for DCO trains put in place.
- 1.2 In 2017, RSSB published an update¹ to the risk analysis carried out in T743. The findings of the updated analysis show that there is no additional risk for passengers boarding and alighting DCO trains. Therefore, the objective of this change was to encourage better collaboration with trade union health and safety representatives in the process of changing train dispatch arrangements. This was intended to foster better decision making when reviewing, modifying, or implementing methods of dispatch.

2. How has the content in the standard changed to achieve the objectives?

Objective 1 – Encourage better collaboration when changing train dispatch arrangements

- 2.1 RIS-3703-TOM contains requirements and guidance for the review and implementation of passenger train dispatch processes and measures to manage the safe behaviour of passengers at the PTI. The standard sets out a PTI risk assessment process. The risk assessment process includes a requirement setting out assessment responsibilities. It also provides guidance on which stakeholder organisations can be part of the assessment team and the experience, knowledge and skills they should bring to the process.
- 2.2 Guidance in two topic areas, 'Assessment responsibilities' and 'Requirement to review', has been revised. Both topic areas have been amended to make it clearer that trade union health and safety representatives are key stakeholders in the risk assessment process (see Disposition Table in Appendix A).

3. How urgently did the change need to happen to achieve the objectives?

- 3.1 ASLEF submitted a request for help in March 2021 with the request above, expecting revision to RIS-3703-TOM to be published by September 2022.

¹ Risk associated with train dispatch – Summary of risk analysis and consolidation of current knowledge, RSSB, July 2017.

4. What are the positive and negative impacts of implementing the change?

A. Legal compliance and assurance

- 4.1 The change supports the requirement in the Railways and Other Guided Transport Systems (Safety) Regulations 2006 (as amended) (ROGS) for transport operators to show how persons carrying out work and their representatives are involved with the safety management system. ORR's guidance to ROGS² sets out what a 'suitable and sufficient' risk assessment should cover. This includes involving staff and their representatives as they are well placed to contribute practical knowledge to the risk assessment process. The change will therefore have a positive impact on legal compliance and assurance. However, this impact is low and not proportionate to quantify.

B. Health, safety and security

- 4.2 Involving relevant staff representatives when reviewing, modifying or implementing a method of dispatch will help transport operators make better decisions on a full range of control measures for the risks identified. The risk related to train dispatch is estimated to be 1.8 fatalities and weighted injuries (FWI) per year. If the changes to the standard allow transport operators to make better decisions on the method of train dispatch in at least 25% of future train dispatch risk assessment reviews, and in each of these the risk is lowered by 1%, this could save the industry nearly £50,000³ over five years.

C. Reliability and operation performance

- 4.3 This is not directly applicable to the change.

D. Design and maintenance

- 4.4 This is not directly applicable to the change.

E. People, process and systems

- 4.5 The revisions to the standard do not change any requirements, however it is clearer in the guidance that trade union health and safety representatives may have the experience, knowledge and skills to contribute to assessments. Although this is likely not to affect transport operators' processes and procedures, the standard highlights that it is good practice to involve the trade union health and safety representatives in new risk assessments, or reviews of existing risk assessments.

F. Environment and sustainability

- 4.6 This is not directly applicable to the change.

G. Customer experience and industry reputation

- 4.7 This is not directly applicable to the change.

² The Railways and Other Guided Transport Systems (Safety) Regulations 2006 (as amended) (ROGS) – A Guide to ROGS, October 2021, pp 61.

³ The risk related to train dispatch is 1.8 FWI/year and the value of preventing a fatality is £2,100,000. If the risk is reduced by 1% on 25% of future methods of dispatch decisions, the savings to industry are £9,450 per year of £47,250 over five years (1.8 FWI/year x 0.01 risk reduction x 0.25 decisions x 5 years).

5. What is the contribution of this standards change in realising the value to industry opportunity?

- 5.1 Involving a range of representatives with experience, knowledge and skills supports a robust risk assessment process, therefore the contribution of this change is minor but useful.

6. What was the effort required by RSSB to make the change?

- 6.1 Some of the revisions required engagement with rail operations and human factors experts.

7. Did RSSB deliver against industry's expected timescales?

- 7.1 RIS-3703-TOM issue 5 was published in September 2022.

8. How will the industry implement the change?

- 8.1 The change to the standard is minor. It will be communicated to industry through the quarterly standards webinar after the publication of the standard and presented at cross-industry forums such as RDG's Operations Standards Forum (OSF) and the Leading Health and Safety Strategy PTI Working Group.

9. How will RSSB assess whether the change is achieving the objectives?

- 9.1 RSSB will review the standard 12 months after its publication to determine if the change is achieving its objective. RSSB will also seek feedback from trade unions.

Appendix A Disposition Table

Table A1: RIS-3703-TOM issue 4.1 to RIS-3703-TOM issue 5

From RIS-3703- TOM issue 4.1	To RIS-3703- TOM issue 5	Way forward	Comments	Objective
NA	G 2.3.2	New	New clause to include The Safety Representatives and Safety Committees Regulations 1977 and Health and The Safety (Consultation with Employees) Regulations 1996.	1
G 2.3.6	G 2.3.7	Redrafted	Redrafted to include the term 'good practice,' and clause amended to strengthen the experience and knowledge of an assessment team.	1
NA	G 2.3.7, c)	New	The bullet point, 'Train operations, including train driving and train dispatch' added to strengthen the experience and knowledge of the assessment team.	1
G 2.3.6, f)	G 2.3.7, g)	Revised	Revised to incorporate the words 'trade union' in the 'health and safety representatives.' This brings consistency with the rest of the document, where the term was already used.	1
G 2.3.7	G 2.3.8	Revised	'Trade unions' have been removed from other 'stakeholder organisations' as they are now mentioned in G 2.3.6 f).	1
NA	G 2.3.11	New	New clause added. The revision makes it clear that when carrying out a risk assessment all representatives should be informed of their involvement 'with enough time to make the necessary arrangements.'	1
NA	G 2.3.12	New	New clause added to signpost two useful guidance documents to interpret the Safety Representatives and Safety Committees Regulations 1977 and the Health and The Safety (Consultation with Employees) Regulations 1996.	1
G 2.7.12	G 2.7.12	Redrafted	Redrafted to include the term 'good practice' to strengthen the review arrangements, which include who will be consulted.	1
G 2.7.12, d)	G 2.7.12, d)	Revised	This is guidance on the arrangements of the review of a risk assessment. The revision makes it clear that part of the arrangement is to determine who will be consulted, incorporating trade union members.	1
NA	Definitions	New	The definition for 'good practice' was added to support G 2.3.7.	1