

Consultation comments and responses

Document number: **RIS-3751-TOM**

Issue: **3**

Title: **Rail Industry Standard on Train Driver Selection**

Draft: **N/A**

Consultation closing date: **09/08/2021**

1. Responders to consultation

No	Name	Company
1	SP	East Coast Trains
2	RL	RDG
3	SB	ORR
4	DC	GTR

2. Summary of comments

Code	Description	Total
-	Consulted	
CE	Critical errors	
ED	Editorial errors	
TY	Typographical errors	
OB	Observations	7
-	Total comments returned	7

Classification codes for a way forward:

- DC – Document change
- NC – No change

3. Collated consultation comments and responses

No	Page	Clause	Comment	Suggestion	By	Response
1	9	G2.6.2.3.	Reference the test being valid for 5 years - Whilst RIS 3751 is clear that the validity of the test is 5 years – what is the interpretation of this?? For instance does a company's CMS supersede this if the individual commenced employment as a train driver – even if this was for a company who are not required to issue a driver licence (Tyne & Wear Metro) or for instance a depot driver. Is the test an indicator of suitability to train rather than competence?	Clarification of the rationale for the 5-year limit – The ORR guide for applying for a licence does not reference the 5 year period merely asks if a test has been completed by a recognised practitioner. The mismatch between the two has caused confusion.	ECT	Thank you for your comment. The 60-month review of RIS-3751-TOM concluded that the standard needs a fundamental review. This can include review of the 5-year validity period of an assessment.
2	10	2.7	<p>The Train Driver Academy have a Task and Finish Group with the aim of reducing the minimum age of train drivers from the current age to 18 years old, in line with the requirements detailed within 2007/59/EC for domestic drivers.</p> <p>In this regard, we are also looking at the psychometric assessment process and whether there should be changes in the amount of candidate attempts permitted. The TDAB have suggested that if we recruit at a younger age, is it fair that a delegate that fails twice, should never be allowed to retake an assessment during their lifetime?</p> <p>The areas the TFG are tasked to work through are;</p> <p>TFG Phase 1</p> <p>Review the current psychometric testing process to assess the limit on two lifetime attempts and whether the number of attempts can be increased as well as whether there are enough opportunities for all members of society to access information about the psychometric testing.</p> <p>TFG Phase 2</p> <p>Establish and agree the next steps to testing intervals in between the attempts of psychometric testing and document it within a revised rail industry standard.</p> <p>TFG Phase 3</p> <p>Review test materials and make available to all members of society for free and open access.</p>	<p>Currently we are not proposing any particular revised text for this section, but the results from the TFG could impact on the requirements of this section.</p> <p>The TFG for this working group meets to discuss Phase 1 on the 27th July 21.</p>	RDG	Thank you for your comment. We will keep close collaboration and engagement with the Task and Finish Group and RDG when the project to revise RIS-3751-TOM commences so we incorporate any agreed good practice into the standard and if necessary, review the 2 attempts rule.
3			According to the RIS the psychometric assessment process should be subject to RSSB evaluation every 5 years. It would be useful to know whether this was done last year and if so how were the results shared with TOCs?		ORR	An evaluation of the assessment process was undertaken in 2018. The results are available on Spark.org. The evaluation demonstrated that the assessments remain valid and fair.
4	7	2.2	Include a requirement to check the TDLCR register held by ORR to check if the driver has held a licence before and whether there is any information recorded against the licence in particular in relation to withdrawal and suspension		ORR	Noted.

No	Page	Clause	Comment	Suggestion	By	Response
5	12	2.10	The sections which state that a selection process involving psychometric assessment does not have to be used for candidates with previous experience as a train driver were written before the deadline for all drivers to be licensed and are not applicable to candidates applying for their first licence after 29 October 2018. This is potentially misleading and should be reviewed. We suggest that a review of the RIS might consider whether the full psychometric assessment package as per the Appendix is appropriate for use in periodic psychological fitness examinations.		ORR	Noted. The 60-month review of RIS-3751-TOM concluded that the standard needs a fundamental review. The review will make sure information is aligned with legislation, including legislation in place after the UK left the European Union.
6	17		Appendix B transfer of safety information will require updating to reflect the fact that we will not recognise EU train driving licences in the UK from 1 Feb 2022. In addition could the requirement to complete this transfer process be strengthened.		ORR	Noted. The 60-month review of RIS-3751-TOM concluded that the standard needs a fundamental review. The review will make sure information is aligned with legislation, including legislation in place after the UK left the European Union.
7	n/a	n/a	GTR are very supportive of the scope of the 60 month review, as this should be subject to a more fundamental review of the content, which has picked up the previous comments received including mine.	n/a	GTR	Thank you. Yes, there will be a fundamental review of RIS-3751-TOM.