

20-024, Review of RIS-3350-TOM, Communication of Urgent Operating Advice

[This page should be deleted at the publication stage of the project]

Version:	1.01		
Purpose:	Approval to publish		
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Lead industry committee:	Traffic Operation and Management Standards Committee (TOM SC)	Date:	28 February 2023
Supporting industry committee:	N/A	Date:	N/A

Decision

- **COMMENT** on the proposed responses to comments received during consultation.
- **APPROVE** with or without modification the proposed responses to comments received during consultation.
- **DECIDE** if the proposed new issue 2 of RIS-3350-TOM delivers its intentions.
- **APPROVE** the proposed new issue 2 of RIS-3350-TOM for authorisation to publish.

20-024, Review of RIS-3350-TOM, Communication of Urgent Operating Advice

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.

Proposed documents

Number	Title	Issue
RIS-3350-TOM	Communication of Urgent Operating Advice	2

Superseded documents

Number	Title	Issue
RIS-3350-TOM	Communication of Urgent Operating Advice	1

Summary

Background and change

RIS-3350-TOM was ‘re-badged’ from a Railway Group Standard (GORT3350) to a Rail Industry Standard in December 2016, as it did not meet the criteria to be considered a National Technical Rule. The technical content of the document was, however, unchanged from issue 5 of GORT3350, which was published in December 2011. It was therefore over eleven years old.

A five-year review of RIS-3350-TOM was carried out in 2018. The review made several recommendations for updating the document, including:

- Changes to reflect that Urgent Operating Advice is now communicated online via Rail Notices.
- Reformatting into the standard RIS format, with requirements, rationale and guidance.
- Updating references to other documents.

Request for Help 21-REQ-046 was received from the Passenger Operators’ Safety Group in 2020, highlighting that the process set out in RIS-3350-TOM had fallen almost into disuse. This also requested clearer definitions and guidance on using the process, and a ‘relaunch’ to remind industry of its obligations.

The proposed update to RIS-3350-TOM incorporates changes to address both the five-year review recommendations and the request for help.

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	Medium	£59,000		
C. Reliability and operational performance	Medium	£130,000		
D. Design and maintenance	N/A	-		
E. People, process and systems	N/A	-		
F. Environment and sustainability	N/A	-		
G. Customer experience and industry reputation	Low	Not proportionate to quantify		
Total value of industry opportunity =		£189,000 over five years		
The standards change contribution to the total value of industry opportunity				
<input type="checkbox"/> None or low	<input type="checkbox"/> Minor but useful	<input checked="" type="checkbox"/> Moderate	<input type="checkbox"/> Important / essential	<input type="checkbox"/> Urgent / critical

Detail

1. What are the objectives associated with this change?

Objective 1 – improve the clarity of RIS-3350-TOM

- 1.1 The technical content of RIS-3350-TOM was over eleven years old, and much of it was therefore outdated.
- 1.2 The updated version of RIS-3350-TOM is intended to be clearer for users, as it will:
 - a) Align the technical content of the document to current reporting processes.
 - b) Follow the standard RIS format, setting out requirements, rationale to explain the requirements, and guidance to help users comply with the requirements.
 - c) Include current references to other relevant documents.

Objective 2 – increase industry awareness of RIS-3350-TOM, and support correct use of the reporting process for urgent operating advice

- 1.3 Use of Rail Notices to communicate urgent operating advice has declined markedly since 2017. Until this point, around five or six incidents were communicated in a typical year. For the whole of 2018, 2019, 2020 and 2021 only four reports were made, with none at all between August 2019 and December 2021. This may have resulted in lost opportunities to share urgent safety learning.
- 1.4 The updated version of RIS-3350-TOM includes enhanced guidance to make it clearer when the process for communicating urgent operating advice should be used. The requirements for reporting under RIS-3350-TOM were also updated to make them clearer for industry to understand and follow.
- 1.5 The new issue of RIS-3350-TOM will also be supported with communications materials to remind industry of its obligations under the standard and promote correct reporting of urgent operating advice.

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

Objective 1 - improve the clarity of RIS-3350-TOM

- 2.1 The content of the standard was reviewed and amended throughout, to make sure that:
 - a) it reflected industry's current reporting process for urgent operating advice using Rail Notices.
 - b) references reflected current documents.
 - c) the technical content met the current RIS format, setting out requirements supported by rationale and guidance.

Objective 2 - increase industry awareness of RIS-3350-TOM, and support correct use of the reporting process for urgent operating advice

- 2.2 The content of Appendix A was completely revised, to enhance the guidance provided and make sure it was clear about when the process for reporting urgent operating advice is to be used.
- 2.3 The reporting requirements themselves were updated to make them clearer and support correct reporting.

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

- 3.1 In parallel with the review of RIS-3350-TOM, work was also underway to update the related standards RIS-8250-RST *Reporting high-risk defects* and RIS-0707-CCS *Managing Safety-Related Failures of the Control, Command and Signalling System*. Further, there was an active project to update the Rail Notices website.
- 3.2 There are potential dependencies and relationships between RIS-3350-TOM, RIS-8250-RST, RIS-0707-CCS and Rail Notices. Because of this, we intend to align publication of RIS-3350-TOM with the scheduled completion of work on RIS-8250-RST, RIS-0707-CCS and Rail Notices, due in June 2023.

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

Justification of impact, scale and quantification for the seven impact areas

A. Legal compliance and assurance

- 4.1 The common safety method (CSM) for monitoring (Commission Regulation (EU) 1078/2012 (as amended) requires infrastructure managers (IMs), railway undertakings (RUs) and entities in charge of maintenance to:
 - a) ensure, through a monitoring process, that any relevant safety-related information is exchanged, to enable the other party to take any necessary corrective actions; and
 - b) report any relevant safety risk regarding defects and construction non-conformities or malfunctions of technical equipment, including those of structural sub-systems, to the other parties involved to enable them to take any necessary corrective actions.
- 4.2 The Railways and Other Guided Transport Systems (Safety) Regulations 2006 (as amended) (ROGS) also requires that transport operators have procedures in their safety management systems to ensure that accidents, incidents, near misses and other dangerous occurrences are reported, investigated and analysed and that necessary preventative measures are taken.
- 4.3 The requirement to share safety knowledge can help to prevent or reduce the consequences of similar incidents.
- 4.4 Users of this updated standard will benefit from clearer guidance about when to report urgent operating advice using Rail Notices.

- 4.5 Fines for not complying with health and safety legislative requirements can be high. For example, in April 2021 a duty holder was fined £1.5 million for breaches of the Health and Safety at Work etc. Act 1974 following a prosecution led by the Office of Rail and Road.
- 4.6 There may be a small risk of inadvertent non-compliance arising from misunderstanding of the outdated RIS text. It is therefore possible that the updated RIS could reduce the likelihood of a non-compliance. However, given the uncertainties involved it is not considered proportionate to attempt to quantify this benefit.

B. Health, safety and security

- 4.7 As noted in paragraph 4.3, there are requirements to share safety learning under the CSM for monitoring and ROGS.
- 4.8 Failure to share relevant safety information could increase the risk of an accident or incident if a transport operator is unable to learn from that information. The risk of injury from incidents due to miscommunication (the closest cause precursor from the Safety Risk Model) is 0.05891 FWI per year. If there was a 10% reduction in risk as a result of revising this RIS, then this represents 0.005891 FWI per year. Using the Value of Preventing a Fatality (£2,017,000) this represents a benefit of £59,410 over five years, rounded to £59,000 for the purposes of this estimate.

C. Reliability and operation performance

- 4.9 Reporting urgent operating advice may help to improve overall operational reliability, by reducing the chance of a disruptive operating incident or irregularity occurring.
- 4.10 There are several different delay types, based on the attribution codes in the *Delay Attribution Guide*, which could be reduced by effective communication of urgent operating advice. These include:
- a) AG – overloaded wagons, slipped load or similar
 - b) FA, FX – dangerous goods incidents, irregularities, loading errors
 - c) FC – freight driver error
 - d) FZ – other freight operating company cause, including mishaps
 - e) I5 – possession overruns due to staff actions or omissions
 - f) JL – staff safety-related incidents
 - g) OC – signaller errors, including misrouting
 - h) OK – IM operations staff oversight, issues or absence
 - i) RY – mishap, station operating cause
 - j) TG – driver
 - k) TY – mishap, train operating company cause
- 4.11 Operational delay attribution data for 2020-21 included over 525,000 total delay minutes attributed to these different causes. Given the breadth of the delay attribution categories, clearly only a proportion of these incidents could be avoided through more effective reporting of urgent operating advice. However, if an improved standard resulted in better reporting that

mitigated just 0.1 % of these delay minutes, this would represent a benefit of over £26,000 per year, or £130,000 over five years¹.

D. Design and maintenance

4.12 No benefit claimed.

E. People, process and systems

4.13 No benefit claimed.

F. Environment and sustainability

4.14 No benefit claimed.

G. Customer experience and industry reputation

4.15 Effective sharing of urgent operating advice will help to improve the safety of the railway system by disseminating important safety learning quickly across the industry. This will potentially improve the overall reliability of the GB mainline railway, and therefore customer perception.

4.16 Because there is very little data relating to the number of incidents or delays that more effective communication of urgent operating advice could prevent, we have not attempted to apportion a value to this benefit.

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

5.1 The proposed updated RIS, together with its 'sister' documents RIS-8250-RST, RIS-0707-CCS and a supporting flowchart in Technical Note TN105, will help industry to identify when it is appropriate to report urgent operating advice.

5.2 Based on the assessment in section **Error! Reference source not found.**, we estimate a net benefit to industry of £189,000 over five years.

5.3 The standards change contribution to the total value of the industry opportunity is categorised as moderate.

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

6.1 The project was assigned a project manager, with a principal rail operations specialist as the technical lead.

6.2 The project required input from relevant stakeholders including RUs and IMs. RSSB engaged with representatives from across the industry to make sure that current requirements and good practices were captured in the updated RIS.

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

7.1 Resources were available to meet a target publication date of June 2023.

¹ Assuming a nominal cost of £50 per delay minute

8. How will the industry implement the change?

- 8.1 Publication of the updated RIS will be supported by a communications package to ‘relaunch’ the standard, and remind industry of the requirements it places on them. This will include engagement with relevant cross-industry groups, for example the Train Accident Risk Group (TARG) and Operations Standards Forum (OSF).
- 8.2 RSSB will also brief changes to the standard at a webinar.
- 8.3 The principles of the process for raising urgent operating advice using Rail Notices will not change as a result of this project – indeed the standard is being updated to align with the process itself. Industry will therefore continue to raise urgent operating advice in the same way as before.

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

- 9.1 Stakeholders who have contributed to the updates to the RIS will be invited to comment on the revised standard, to make sure that it incorporates current processes and good practice. As with all RSSB standards, the new issue of RIS-3350-TOM will be reviewed 12 and 60 months after publication, including input from these stakeholders to assess industry’s experience of applying the updated standard.

Appendix A – Disposition table

From RIS-3350-TOM Issue 1	To RIS-3350-TOM Issue 2	Way forward	Comments	Objective
1.1	1.1	Redrafted	Redrafted to improve clarity.	1
1.2.1	1.3.1	Redrafted	Redrafted to improve clarity.	1
1.2.2.1	N/A	Withdrawn	The content of this section has been withdrawn. It implies that Network Rail is the only infrastructure manager, which is no longer the case on the GB mainline railway. It also describes the Rail Notices process in prescriptive detail, which would become obsolete should the process change during the lifetime of the standard.	1
1.2.2.2	G 2.1.4	Redrafted	Redrafted to improve clarity.	1
1.2.3	1.4.1, A.1.5, A.1.6	Redrafted	References to GE/RT8250 and GK/RT0106 updated to RIS-8250-RST and RIS-0707-CCS respectively.	1, 2
1.2.4	N/A	Withdrawn	The references in this section were obsolete. References to other documents that support RIS-3350-TOM are referred to at the appropriate point in the text of the new standard.	1, 2
2.1.1	2.1	Redrafted	No material change to requirement, but redrafted into current RIS format with supporting rationale and guidance.	1
2.1.2	2.2	Redrafted	No material change to requirement, but redrafted into current RIS format with supporting rationale and guidance.	1
2.2.1	3.1	Redrafted	No material change to requirement, but redrafted into current RIS format with supporting rationale and guidance.	1
2.2.2	3.2	Redrafted	No material change to requirement, but redrafted into current RIS format with supporting rationale and guidance.	1
2.2.3	3.3	Redrafted	No material change to requirement, but redrafted into current RIS format with supporting rationale and guidance.	1

From RIS-3350-TOM Issue 1	To RIS-3350-TOM Issue 2	Way forward	Comments	Objective
3.1.1.1	1.2.1	Redrafted, withdrawn	First sentence redrafted as section 1.2.1. RIS-3350-TOM issue 2 now sets out more details of the legislative background behind reporting requirements. Remainder withdrawn as Network Rail is no longer the only infrastructure manager and therefore the content is obsolete.	1, 2
3.1.1.2	Appendix A	Redrafted	Now included in Appendix A along with detailed guidance on reporting requirements.	1, 2
3.1.1.3	1.4.3	Redrafted	Redrafted to improve clarity.	1
3.1.1.4	1.4.4	Redrafted	Redrafted to improve clarity.	1
3.1.2	N/A	Withdrawn	Not relevant following change of document status to a RIS.	1
3.1.3	N/A	Withdrawn	Not relevant following change of document status to a RIS.	1
3.1.4	N/A	Withdrawn	Not relevant following change of document status to a RIS.	1
3.2.1.1	1.2.1	Redrafted	Redrafted to improve clarity.	1
3.2.1.2	Appendix A	Redrafted	Now included in Appendix A along with detailed guidance on reporting requirements.	1, 2
3.2.1.3	1.4.3	Redrafted	Redrafted to improve clarity.	1
3.2.1.4	1.4.4	Redrafted	Redrafted to improve clarity.	1
3.2.2	N/A	Withdrawn	Not relevant following change of document status to a RIS.	1
3.2.3	N/A	Withdrawn	Not relevant following change of document status to a RIS.	1
3.2.4	N/A	Withdrawn	Not relevant following change of document status to a RIS.	1
3.3	1.6.1	No change		1
A.1.1	G 3.1.3	Redrafted	Redrafted as guidance to support requirement 3.1.	1, 2

From RIS-3350-TOM Issue 1	To RIS-3350-TOM Issue 2	Way forward	Comments	Objective
A.1.2	3.4	Converted to requirement	Converted to a requirement which balances the existing reporting requirements by mandating that reports received are reviewed and acted on.	1, 2
A.1.3	G 3.1.4	Redrafted	Redrafted to improve clarity.	1
A.1.4	A.1.1	Redrafted	Enhanced guidance now refers to new technical note TN105. This document includes a flowchart to assist users with deciding which is the appropriate process to use for urgent safety-related reporting.	1, 2
A.2.1	A.1.8	Redrafted	Term 'equipment defect' replaced with 'equipment failure' throughout to align with terms used in RIS-8250-RST and RIS-0707-CCS. Term 'irregularity' deleted throughout, as this refers to an 'incident' in line with the terms used in RIS-3119-TOM.	1
A.2.2	A.1.8	Redrafted	Redrafted to improve clarity.	1
A.3.1	A.1.3, A.1.4	Redrafted	Redrafted with expanded guidance. Term 'equipment defect' replaced with 'equipment failure' throughout to align with terms used in RIS-8250-RST and RIS-0707-CCS.	1, 2
A.3.2	A.1.5, A.1.6	Redrafted	Redrafted to improve clarity.	1
A.4.1	A.1.12, A.1.13, A.1.14, A.1.15, A.1.16, A.1.17	Redrafted	Redrafted with enhanced guidance. Terminology around errors updated to align with RIS-3119-TOM. New clause A.1.17 added signposting guidance on Human Performance Factors and 10 Incident Factors in RIS-3119-TOM.	1, 2
A.4.2	A.1.12, A.1.13, A.1.14, A.1.15, A.1.16, A.1.17	Redrafted	Redrafted with enhanced guidance. Terminology around errors updated to align with RIS-3119-TOM. New clause A.1.17 added signposting guidance on Human Performance Factors and 10 Incident Factors in RIS-3119-TOM.	1, 2

From RIS-3350-TOM Issue 1	To RIS-3350-TOM Issue 2	Way forward	Comments	Objective
A.4.3	A.1.12, A.1.13, A.1.14, A.1.15, A.1.16, A.1.17	Redrafted	Redrafted with enhanced guidance. Terminology around errors updated to align with RIS-3119-TOM. New clause A.1.17 added signposting guidance on Human Performance Factors and 10 Incident Factors in RIS-3119-TOM.	1, 2
A.5.1	A.1.19, A.1.19, A.1.20, A.1.21, A.1.22, A.1.23	Redrafted	Redrafted with new and updated examples which aim to make reporting requirements clearer.	1, 2
A.6.1	A.1.24, A.1.25	Revised	Refers users to the guidance that the IM is required to publish setting out reporting arrangements, rather than specifying details of current reporting processes. This will prevent the standard becoming obsolete should reporting arrangements change during its lifetime.	1
A.6.2	A.1.24, A.1.25	Revised	Refers users to the guidance that the IM is required to publish setting out reporting arrangements, rather than specifying details of current reporting processes. This will prevent the standard becoming obsolete should reporting arrangements change during its lifetime.	1
A.6.3	A.1.24, A.1.25	Revised	Refers users to the guidance that the IM is required to publish setting out reporting arrangements, rather than specifying details of current reporting processes. This will prevent the standard becoming obsolete should reporting arrangements change during its lifetime.	1
A.6.4	A.1.24, A.1.25	Revised	Refers users to the guidance that the IM is required to publish setting out reporting arrangements, rather than specifying details of current reporting processes. This will prevent the standard becoming obsolete should reporting arrangements change during its lifetime.	1
A.6.5	A.1.9	Redrafted	Redrafted to improve clarity.	1, 2

From RIS-3350-TOM Issue 1	To RIS-3350-TOM Issue 2	Way forward	Comments	Objective
A.6.6	A.1.24, A.1.25	Revised	Refers users to the guidance that the IM is required to publish setting out reporting arrangements, rather than specifying details of current reporting processes. This will prevent the standard becoming obsolete should reporting arrangements change during its lifetime.	1
A.6.7	A.1.26	Redrafted	Redrafted to improve clarity.	1
A.7.1	A.1.27	Redrafted	Redrafted to improve clarity.	1
A.7.2	A.1.28	Redrafted	Redrafted with enhanced guidance	1, 2
Definitions	Definitions	Redrafted	Definitions of 'Equipment', 'High risk defect', 'High risk operating incident or irregularity' and 'Urgent Operating Advice' from RIS-3350-TOM issue 1 are included in the appropriate point in the text of issue 2. These have all been updated to align terminology with other RSSB standards including RIS-3119-TOM, RIS-8250-RST and RIS-0707-CCS. Definition of 'Train' retained and updated in line with current legislation. Other definitions added to align with RIS-8250-RST and RIS-0707-CCS.	1, 2
N/A	1.4.2	New	New clause signposting RSSB Technical Note TN105, which includes a flowchart to assist users with determining the correct process to use for carrying out urgent, safety-related reporting.	2
N/A	A.1.17	New	New clause signposting guidance on Human Performance Factors and 10 Incident Factors in RIS-3119-TOM.	2
N/A	A.1.29	New	New clause highlighting that, although RIS-3350-TOM does not specify reporting timescales, for certain types of incidents legislation such as ROGS or RIDDOR may impose time limits.	2