

# Consultation comments and responses

**Document Title:** NOPs Amendments September 2022 Publication

**Document number:** Rulebook

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## 1. Responders to consultation

No	Name	Company
1	Stuart Webster-Spriggs	Volker Rail
2	Jane Colgan	Network Rail
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4		RSSB
5		

## 2. Summary of comments

Code	Description	Total
-	Consulted	281
CE	Critical errors	
ED	Editorial errors	
TY	Typographical errors	
OB	Observations	
-	Total comments returned	

Classification codes for a way forward:

- DC – Document change
- NC – No change

### 3. Collated consultation comments and responses

No	Page	Clause	Comment	Suggestion	By	Way forward	Page	Clause	Response
1	3	3	GERT8000-HB12 ERTMS Competence and Identification	Include the additional commit makes reference to the DP competence requirements for an ES / SWL when working in ERTMS areas	1	NC			This comment is not understood as there is no known requirement for such a competency.
2	6	P1, P2	GERT8000-P1 and P2 I do not see any reference to “pilot” being an acronym for “person in lieu of token”	Including this may be useful although I realise not all pilot working is due to a missing token	2	NC			Although this acronym has been suggested, in many parts of the network, the single or bi-directional line concerned would not be worked by means of a token and the association is unlikely to be made.
3	7	2.2	GERT8000-HB8 ‘You must arrange for at least one of the following additional protection arrangements, as shown in section 2.3 to 2.11, to be provided on the line to be blocked whenever this is possible’.	Add to the end of the sentence ‘and does not introduce an additional disproportionate risk identified through the associated risk assessment’	1	NC			The instruction is directed to a COSS who in most cases will be implementing a planned safe system of work. The COSS will not be carrying out any form of risk assessment, which would have informed the planned SSOW defined.
4	10	2.2	GERT8000-HB21 ‘You must arrange for at least one of the following additional protection arrangements, as shown in section 2.3 to 2.11, to be provided on the line to be blocked whenever this is possible’.	Add to the end of the sentence ‘and does not introduce an additional disproportionate risk identified through the associated risk assessment’	1	NC			The instruction is directed to a SWL who in most cases will be implementing a planned safe system of work. The SWL will not be carrying out any form of risk assessment, which would have informed the planned SSOW defined
5	16	4.4	GERT8000-TW1 Bullet point 2 refers to applying clause 5.3 of TW5 should a lead vehicle brakes be isolated. I believe this should reference clause 5.4	Review the clause reference. Clause 5.4 of TW5 refers to brakes isolated on lead vehicles.	3	DC	16	4.4	The cross-reference should be to section 5.4 and this has been corrected.
6	17	8.1	GERT8000-T10-2nd paragraph- 2nd bullet point missing SWL?	To include the term ‘SWL’ as opposed to just ES	1	DC	17	8.1	The document has been amended to correct this.
7	17	8.1	GERT8000-T10-2nd & 3rd paragraph - 3rd bullet point- uses the term ‘MC’ but doesn’t cover the scope of OTM drivers requires to add additional bullet point or is it that the last bullet point ‘ the MC, if work is to take place on an item of OTP’ is deleted?		1	NC			This new section was developed in collaboration with operators familiar with on-track equipment, who advised that it is a person competent as a DP who makes the request for line protection, unless on-track plant, rather than an on-track machine, is concerned, in which case the machine controller should make the request.
8	17	8.1	GERT8000-T10-What does the 3rd paragraph mean?	Should you not inform the signaller?	1	NC			The principle that underlies this section is that the DP will obtain the necessary line protection by asking the person responsible for allowing movements on a line or siding under possession, or the person who can obtain a line blockage from a signaller if the protection is for a line not under possession. The DP would not contact a signaller direct.
9	17	8.1	GERT8000-T10-NR3180 has been used as a reference/record of arrangements.	Was anything considered as part of the risk assessment alternatively Handbook 21 clause 1.2 states methodology?	1	NC			This new section describes how line protection is obtained. For a line or siding under possession, this is arranged with the person responsible for permitting movements. If movement is to be stopped on a line not under possession, this is achieved by a line blockage as shown in Handbook 21 and elsewhere, which would involve the use of an NR3180 form.
10	19/20	6.9	GERT8000-HB12-Why do we specify OTP & MC as the COSS & DP are competencies to set up a safe system of work, how will the MC control manage this & how taking into the associated safety risks?	Consider a standard process within the T3 Engineering Possession of competency for the task that is to be undertaken such as DP	1	NC			Except in the case of on-track plant, the DP arranges line protection with the person who authorises movements over a line or is able to obtain a line blockage on a line open to traffic. The view expressed during drafting was that, in the case of OTP, it would be correct for the MC to pass on this request from the DP. The MC is not responsible for providing the line protection.

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11	20	10.4	GERT8000-HB15- DP is a recognised competence & safety critical task & must not start work until protection has been provided & briefing given This reads better as the MC needing to ask COSS/ ES etc (2 bullet points)	To consider using similar reference for Handbook 12?	1	DC	20	10.4	This does not convey the intended meaning correctly and has been reworded in the way suggested.
12	32	8.17	GERT8000-HB11- It makes reference to the DP for work to be undertaken out on a rail vehicle. However, within the other associated handbook modules e.g. this isn't standard practise	Consider a standard process within the T3 Engineering Possession of competency for the task that is to be undertaken such as DP	1	NC			Module T10 describes the arrangements that a DP must make for line protection when work is to take place on a vehicle within a possession. The request is made to the person able to prevent movement on the line in question and the wording in each of the corresponding handbooks varies with the different circumstances.
13	36	9.6b	GERT8000-T3- To what extent are we expecting Drivers to observe lineside signals & ERTMS block markers (and hand signals) when running under ETCS in overlay as part of the ECDP?  How will this be managed in relation to route knowledge (& are drivers expected to know ETCS for route knowledge purposes? ) How does this apply to ECDP for non-trained ECTS drivers, in OMO, how is the workload communicated within the possession staff-human factors to be managed- 2 signalling systems & a work activity- this was a problem we needed to consider for ES/SWL & overlap, same issue but more complex & higher risk.	To review the arrangements & implication when we undertake T3s with & without fitted ETCS & when crossing multiple signalling systems & associated staff training	1	NC			This section has not been amended as part of the current round of changes. Some rules relating to ERTMS/ETCS are of an interim nature and may well change as and when further decisions are taken. This section is based on the assumption that a T3 possession can be taken on either 'conventional' or ERTMS lines and that either ETCS fitted or unfitted trains will operate. In either case, movements within the possession will be authorised by a PICOP or ES, but a fitted train must not pass a block marker except on the PICOP or ES's authority, whilst in the case of an unfitted train the same applies to a signal at danger. Successful implementation is as stated dependent on full training and competence.
14	43	13.1.1	GERT8000-TS1- last line states the ES or SWL can ask to block an adjacent line, how is the new requirements in RB Module T10 managed from a signaller's perspective?	To consider reference/training & assessment/requirements?	1	NC			Where the new section in module T10 and its associated handbooks requires a line blockage to be taken, this would be a line blockage as described in regulation 13.2. The situations in regulation 13.1 do not apply.
15	62	13.5	GERT8000-TS1-personal working on vehicles in sidings- where is it mentioned within a possession? What reference does the signaller have, when drivers take T10 the signallers aren't always aware & want the driver to take a possession of the sidings – resulting in potential performance issues.	To consider reference/training & assessment/requirements?	1	NC			Regulation 13.5 refers to a DP working in a siding not under possession, with the DP's instructions appearing in section 5 of module T10. The purpose of these new instructions is to complete the procedures by addressing vehicles being worked on when a line or siding is under possession.
16	91	Sec 47	GERT8000-TW1- Working on the outside of a train- should there be a reference to possessions? It makes reference to PZ working, an OTM Driver uses one system one day & another method potentially the next although the risk & environment appear to be the same, why the different approaches?	Review holistically setting up safe systems of work to ensure commonality within the various industry stakeholders such as PICOP/EWS/SWL/Train Driver	1	NC			The different procedures are necessary because of the different circumstances in which they apply, and in consequence the ability to prevent the approach of any train movements lies with different roles. Module TW1 applies when the train concerned is on a line open to traffic and the arrangements can be agreed between a driver and a signaller who is aware of the train concerned and is responsible for allowing movement over an adjacent line. Within a PZ, the train is standing on a line under the control of an ES or SWL, who is the correct person to speak to the signaller. The new arrangements are necessary because the need to work on a line under possession has never been documented.

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17		General	GERT8000-P1 and P2 The forms associated with these modules require amendment to replace references to 'pilotman' by the term 'pilot'		4	DC		General	Revised versions of the forms have been produced. The possible rationalisation of the existing forms has not been progressed at this stage, as it has not been possible to gain confirmation that these have been accepted as fit for purpose.
18		General	Forms RTWO04 and 05 still refer to the withdrawn modules P2 ERTMS and TW7 ERTMS and a Request for Help has been received to update the reference.	As an editorial change only, TOM SC agreed that the current round of changes would be an appropriate time to make this minor update.	4	DC		General	The two written orders forms have been amended to refer to the current modules (P2 and TW7).
19	30	8.13	GERT8000-HB11 If that signal is less than 400 metres (440 yards) from the detonator protection, you must not allow the engineering train to approach the signal until the signaller has given you permission to do so.	Why is the distance from the signal to the detonator protection stated here? Is it not the distance from the signal to the points as this would seem to be consistent with 8.12?	4	DC	30 T3 19	8.13  4.6	The object of getting the signaller's permission is to prevent a train passing beyond the detonator protection and reaching the fouling point at the points. This would be more influenced by the location of the detonator protection than that of the signal and the document has been amended in line with the suggestion.
20	15	3.8	GERT8000-SS1 The train safety check gets defined in section 3.3 but then redefined in section 3.8 which may not be the most elegant way to write the requirements. Also in section 3.5,3.6 and 3.7 we ask guard/dispatch staff to check that the orange lights have gone out before beginning the train safety check which includes checking that the doors are closed. However for 3.8 it is sufficient to just to check the orange lights to check that the doors have closed. Would it make sense to separate the checking that the doors are closed from the train safety check, so it becomes a two-stage process?	Would it make sense to separate the checking that the doors are closed from the train safety check, so it becomes a two-stage process?	4	NC			Section 3.8 was amended some time ago to separate the instructions for a DO train departing from an unstaffed platform from the instructions when other staff are involved. The description of the train safety check in section 3.3 is not aimed at the driver. However, some of the wording was duplicated in section 3.8 and included an apparent requirement to check (implicitly by observation) that the train doors are properly closed. As has been pointed out, there are difficulties in doing this with some rolling stock, and this is not shown to be a part of the train safety check for a driver, but as a separate activity.
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