Principles for managing the risk of exposure to COVID 19 to passengers and employees across the GB mainline rail industry

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PREAMBLE

This document sets out a series of principles that should be followed by all organisations across the GB mainline rail industry to manage the risk of exposure to COVID-19 to both passengers and employees and ensure there is not an increase in risk as services and usage increase. These principles have been formulated through discussion with the railway industry, the Office of Rail and Road (as the health and safety enforcement authority) and the trades unions.

The measures listed in this document shall be reviewed as further information and strategic direction is made available from the Government, particularly relating to;

- the lockdown relaxation timetable and how to manage passenger demand;
- responsibility for and details on how to manage social distancing on stations and on-board trains; and
- how to achieve consistency of approach across the GB railway network.

The high-level principles set out in this document are based on continuing the positive constructive relationships between industry, trades unions and employees. Where individual organisations deviate from these overarching principles, they will need to robustly demonstrate that alternative arrangements provide equally effective control of the risk of exposure to COVID 19. Where agreement cannot be achieved on arrangements after internal processes have been exhausted the matter shall be referred to ORR for independent consideration.

The form of wording used in this document is non-prescriptive to allow the principles to be adapted for application in the many and varied railway operations contexts, as well as being helpful to develop more detailed guidance and good practice.

This document shall be subject to regular review by all parties to reflect any further updated health guidance and advice issued by UK and Devolved Government's and Public Health Bodies across the UK.

. Matters arising from such reviews shall be raised with the document controller (identified above) for further consideration, discussion and, where appropriate, referred to the Rail Industry COVID 19 Forum (RICF).

INTRODUCTION

These principles are aligned with the general guidance published by Public Health England (PHE), Public Health Scotland (PHS) and Public Health Wales (PHW) which, it is recognised, will continue to develop

over time. The principles set out in this document should be monitored to identify new information and any inconsistencies between the advice provided by the respective health bodies as these emerge.

As a prerequisite, these principles should underpin and be supported by risk assessments involving trades unions H&S representatives. The arrangements require active monitoring and review, to ensure controls are appropriate and working, and that appropriate action is taken to respond to new hazards, changes in service provision and usage, or new information and advice.

The principles were developed using the hierarchy of controls set out in the Management of Health and Safety at Work Regulations 1999 (see Annex 1), for adherence when carrying out risk assessments and monitoring the effectiveness of exiting risk control measures. The legal provisions of Regulation 8 of these regulations apply to the risk of exposure from COVID 19, through the procedures and protection for staff for dealing with serious and imminent danger and for danger areas.

The social distancing principles form part of the essential controls needed to reduce the spread of Covid-19 as described in the guidance provided by the public health organisations in England[1], Scotland[2] and Wales[3], and are summarised below (by necessity this summary is generic, please refer to individual public health organisation guidance listed in the footnote for an official wording):

1. Do not attend work or travel if symptomatic. Employees and their household members who are displaying symptoms of Covid-19 are encouraged to make use of government testing.

2. Hand hygiene – employees should wash their hands regularly using soap and water for at least 20 seconds and particularly after blowing their nose, sneezing or coughing and before eating - and after travel to and from work.

3. Working from home where possible and in line with current Government advice.

4. Social distancing i.e. being away from other people, where this is practicable.

OVER-ARCHING PRINCIPLES

The high-level principles that the industry has jointly identified for managing the risk of exposure to COVID 19 are:

Principle 1

Maintain social distancing, following Government advice:

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[3] https://www.gov.uk/government/collections/coronavirus-covid-19-list-of-guidance

[4] https://www.publichealthscotland.scot/our-areas-of-work/sharing-our-data-and-intelligence/coronavirus-covid-19-data/

[5] https://phw.nhs.wales/topics/latest-information-on-novel-coronavirus-covid-19/

a. Where this is not compatible with any task, consider if that task can be removed whilst allowing the delivery of a safe and efficient railway. In other words, avoid the risk of activity which does not meet the Government social distancing guidelines by reviewing options to reduce the scopes of roles to remove close contact.

b. Where work and/or tasks are required which cannot meet the social distancing guidelines other appropriate risk reduction measures should be put in place e.g. use of PPE, to reduce the risk of transmission of COVID 19 between those concerned.

Principle 2

Evaluate risks, especially those where social distancing cannot be maintained. Ensure that those activities that cannot be avoided or delayed and are needed to allow the delivery of a safe and efficient railway are compared against the risk of close contact work. Risk assessments should develop controls via the hierarchy of controls to minimise the instances employees need to work in circumstances that are not within the social distancing guidelines.

Principle 3

To combat risks at source:

a. Review staffing and working arrangements to minimise contact and provide assurance that the social distancing guidelines are achievable where possible – e.g. to include enough space in ticket offices, messrooms etc. Consideration could be given to staggering signing-on times and break times to support this.

b. Implement enhanced cleaning regime for all trains and workplaces with focus on frequent touch points.

c. Provide employees the facility and ability to handwash with soap and water. If soap and water is not available, then alcohol-based hand sanitizers should be available.

d. Review and ensure provision of appropriate PPE to employees and contractors[4] undertaking cleaning based on risk assessment for task including any changes in tasks or frequency arising from the COVID 19 crisis. This should apply to all employees working on the railway, including cleaning contractors.

Principle 4

Consider implementing physical arrangements to achieve separation. These could include measures such as the following used either in isolation or in combination:

a. Screens to provide physical separation

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[4] It should be noted that contractors are outside the RICF but employers retain responsibility for assuring themselves that contractors have suitable and sufficient health and safety arrangements in place, including adequate provision of PPE.

b. Fixed or moveable barriers

c. Use of floor markings, signage and/or announcements to encourage separation.

A   PRINCIPLES FOR STATIONS

When applying these principles, consideration should be given to the size and type of station, including the type of passengers using the station to determine the relevance and appropriateness of arrangements for social distancing.

All arrangements are to align, as far as possible, with current Government advice regarding travel by the public and advice from Public Health bodies.

Arrangements for social distancing in the station and on the platform should also be considered in line with existing plans for degraded and emergency situations and subject to active monitoring and review, so controls are appropriate and effective. This should include consideration of day to day issues at the station and any changes that may affect passenger behaviour and the effectiveness of social distancing arrangements.

Where social distancing cannot be achieved risk assessment shall be used to identify appropriate controls using the risk control hierarchy. To be effective these assessments should involve workforce engagement and the legal requirements, in terms of consultation,[5] apply.

The principles:

A1   Social distancing arrangements are considered for entry and exit to the station by passengers. This may include:

- layout and location of station entrances and exits,
- queue management,
- guidance provided to customers before they arrive at the station and when exiting stations

A2   The capacity of station and the flow of passengers should be considered and planned in order to achieve social distancing. Consideration should be given to:

- identifying pinch points, avoiding clustering and bunching
- interchanges with other operators and modes of transport
- operation of retail units
- arrangements around using gate lines
- use of security staff and support from British Transport Police
- information and instructions to passengers
- potential increase in passenger numbers over time

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[5] Safety Representatives and Safety Committees Regulations 1977 (as amended) and Health and Safety (Consultation with Employees) Regulations 1996 (as amended)

A3   Employees are able to social distance from colleagues and passengers in line with government guidance. This should include a review of all the activities undertaken by employees in the station environment, including:

- revenue management
- passenger assistance
- dispatch and platform management
- customer assistance

A4   Measures should be taken to influence passenger behaviour to achieve social distancing. This may include:

- media campaigns, posters, web sites, etc
- signs and public address updates
- floor markings
- staff to marshal passengers
- using security staff / working with BTP support

A5   Existing hygiene management regimes should be enhanced, and facilities made available to achieve this, including:

- cleaning of surfaces that are frequently touched
- maintaining hand washing facilities /providing hand sanitisers
- keeping toilets open and available to customers, if social distancing can be achieved

A6   Equipment which is necessary to manage movement around a station and platform, provide for accessibility or, necessary as part of a risk control, shall be maintained so it is reliable and available. This may include:

- Lifts and escalators
- Toilets and washing facilities
- Ticket machines
- Gate line
- Customer service screens
- Platform-based dispatch equipment

B   PRINCIPLES FOR OFFICES & OTHER NON-PUBLIC OPERATIONAL AREAS

The principles:

B1   Where possible people work from home

B2   Define and stop all non-essential visitors and activities

B3   Assess and plan work and work locations, (including common areas like mess rooms, sign-on locations, control rooms, signal boxes, locker rooms, using lifts, toilets and access and egress) to maintain social distance, including consideration of measures such as lower density occupation and cohorting of teams.

B4   When social distancing cannot be maintained, limit and control exposure using the hierarchy of risk control

B5   Provide for enhanced personal hygiene

B6   Enhanced cleaning regimes and increase frequency

B7   Adapt workplace and working practices to help maintain social distancing

B8   COVID 19 precautions should not compromise safety/create risks in other areas

B9   Individuals take personal responsibility through handwashing and personal hygiene to help prevent the spread of the virus

B10   Use communications channels to reinforce important messages on hygiene and maintaining social distancing

B11   Take steps to monitor/enforce COVID 19 precautions

B12   Emergency plans reviewed and amended where necessary to take into account COVID 19 risks, maintaining adequate fire and first aid precautions.

B13   Mobility and accessibility arrangements reviewed and amended as necessary to take into account COVID 19 risks

C   PRINCIPLES FOR ON-TRAIN

The principles:

C1   Train cleaning: employers shall review their train cleaning regimes to ensure exposure to contaminated surfaces are mitigated to as low as possible.

- Scope includes maintenance facilities, turn around cleaning and travelling cleaners.
- Factors for consideration include:
  o Cleaning products, effectiveness and the use of pre-treatments that mitigate the risk of the hazard being present.
  o Cleaning frequency should be reviewed to reduce the risk of contamination, e.g. cleaning at the end of journey and/or staff change-over.

- o Where possible a log or notice to provide an indication to on-train staff when on-train areas were last cleaned.
- o Provision of anti-viral wipes to on-train staff to enable self-cleaning.

C2 **Revenue protection**: employers shall review their normal arrangements to ensure employees' and passengers' exposure to the hazard are mitigated to as low as possible.

- Scope includes on-train revenue duties.
- Factors for consideration include:
  - o On-train revenue protection should only be carried out where social distancing can be visibly assessed and maintained according to the circumstances on each train / coach at the time.

C3 **On-train catering**: employers shall review their normal arrangements to ensure employees' and passengers' exposure to the hazard are mitigated to as low as possible.

- Scope includes on-train catering duties.
- Factors for consideration include:
  - o Cashless transaction only
  - o On-train catering should only be carried out where social distancing can be visibly assessed and maintained according to the circumstances on each train / coach at the time
  - o Consider any potential additional exposure to the hazard derived from stocking/de-stocking services.
  - o Reducing the need for on-train catering by advising passengers to purchase and/or bring items of food/drink on the train through announcements/various ticketing media.
  - o Use of announcements and other channels to advise passengers of arrangements.

C4 **On-train training and assessment activity**: employers shall review their existing arrangements agreed by the RICF for 'essential training'.

- Scope includes on-train training and assessment tasks.
- Factors for consideration include:

  - o legal obligations: training and assessment are critical tasks to evidence an individual's competence under ROGS and TDLCR.
  - o use of remote assessments to derive evidence to continue to support evidence accumulation.
  - o substituting ride assessments with simulation where possible.

C5 **Traincrew changing ends**: employers shall review their normal arrangements to ensure employees' exposure to the hazard are mitigated to as low as possible.

- Scope includes traincrew changing ends at stations en-route and at termini.
- Factors for consideration include:
  - o consideration of time allowed for changing ends, recognising that at some locations it may take longer than usual.
  - o different train types, lengths and station/platform environments will lead to different approaches geographically.
  - o use of announcements and other channels to advise passengers on arrangements to assist in safe management of the task.

C6 **Guidance to passengers on train capacity, on-train facilities, on-train services and 'passenger assist'**: employers shall review their normal arrangements to ensure employee and passenger exposure to the hazard are mitigated to as low as possible.

- Scope includes provision of guidance and information to traincrew and passengers on train.
- Factors for consideration include:
  - o arrangements in place to assist PRMs with their journey needs and where compliance with social distancing guidelines for the purposes of passenger assist cannot be achieved, suitable controls proportionate to the hazard will be made available to employees
  - o different train types, lengths and station/platform environments will lead to different approaches geographically
  - o Use of signage/announcements/social media and other channels to advise passengers on arrangements to assist in safe management of social distancing in the on-train environment.

D **PRINCIPLES FOR DEPOTS**

The principles:

The following principles apply to TOC operated or managed fleet depots and other train maintenance and cleaning locations and apply to Network Rail (NR) employees working on, or visiting these and also apply to NR "yellow plant" rolling stock maintenance or cleaning locations

D1 Maintenance tasks, including train cleaning, should be undertaken in line with generic social distancing principles (see above) and in line with PHE (or equivalent) guidance, whilst working on or about a traction maintenance depot or train cleaning location.

D2 Where separation on site in line with PHE (or equivalent) guidance is not possible, use risk assessments and introduce appropriate control measures. For maintenance and cleaning tasks

where social distancing is not possible, consider whether the task can be eliminated, de-scoped or deferred. Consider whether the task could be carried out in a different way. For any remaining residual essential tasks necessary to ensure the continued delivery of a safe and reliable railway, these should only be carried out using appropriate control measures identified and validated through risk assessments.

D3   Consider the use of visible markings on depot floors and doors to promote single/limited occupancy, or specific areas to use or not to use and/or foot traffic management in these areas – communicate where these are new or changed through depot plans and team briefings

D4   Where practical, consider offering the option of staggered train maintenance and cleaning shift start and finish times

D5   Consider whether demand for and access to restricted size or enclosed spaces both on depots, and on, around or under trains can be controlled and communicate this to employees and contractors. The social distancing principles developed for Offices also apply to offices on depots

D6   Based on the size of each maintenance or train cleaning work area, determine and communicate how many people can use it at any one time to maintain alignment with PHE guidance

D7   Consider requirements for cleaning of shared tools, bulk consumable items, telephones, keyboards and depot vehicle controls before use

D8   Consider means to Increase the cleaning frequency or intensity of both passenger and crew areas on trains proportional to usage with a focus on surfaces that are touched regularly

D9   Depot road vehicles should ideally be single occupancy, and where this is not possible should have sufficient interior capacity to appropriately distance the passenger from the driver. Consider whether it is practical to fit a temporary barrier between the driver and the passenger. Where there is a confirmed need for multiple occupancy vehicles, e.g. minibuses, social distancing principles should be practiced when boarding, travelling and alighting from such vehicles.

D10   In line with social distancing principles for Train Operations, shunting activity on depot should be conducted with 1 person in the cab.

ANNEX 1: Risk Assessment and the examples of the hierarchy of controls

The Management of Health and Safety at Work Regulations 1999

Schedule 1 - General Principles of Prevention

a.   avoiding risks;
b.   evaluating the risks which cannot be avoided;
c.   combating the risks at source;
d.   adapting the work to the individual, especially as regards the design of workplaces, the choice of work equipment and the choice of working and production methods, with a view, in particular, to alleviating monotonous work and work at a predetermined work-rate and to reducing their effect on health;
e.   adapting to technical progress;
f.   replacing the dangerous by the non-dangerous or the less dangerous;
g.   developing a coherent overall prevention policy which covers technology, organisation of work, working conditions, social relationships and the influence of factors relating to the working environment;
h.   giving collective protective measures priority over individual protective measures; and
i.   giving appropriate instructions to employees.

HSE Guidance on the hierarchy of risk controls
https://www.hse.gov.uk/risk/faq.htm#hierarchy

Risks should be reduced to the lowest reasonably practicable level by taking preventative measures, in order of priority. This is what is meant by a hierarchy of control.   The list below sets out the order to follow when planning to reduce risks you have identified in your workplace. Consider the headings in the order shown, do not simply jump to the easiest control measure to implement.

Elimination	Redesign the job or substitute a substance so that the hazard is removed or eliminated.
Substitution	Replace the material or process with a less hazardous one.
Engineering controls	For example use work equipment or other measures to prevent falls where you cannot avoid working at height, install or use additional machinery to control risks from dust or fume or separate the hazard from operators by methods such as enclosing or guarding dangerous items of machinery/equipment. Give priority to measures which protect collectively over individual measures.
Administrative controls	These are all about identifying and implementing the procedures you need to work safely. For example: reducing the time workers are exposed to

	hazards (e.g. by job rotation); prohibiting use of mobile phones in hazardous areas; increasing safety signage and performing risk assessments.
Personal protective clothes and equipment	Only after all the previous measures have been tried and found ineffective in controlling risks to a reasonably practicable level, must personal protective equipment (PPE) be used. For example, where you cannot eliminate the risk of a fall, use work equipment or other measures to minimise the distance and consequences of a fall (should one occur). If chosen, PPE should be selected and fitted by the person who uses it. Workers must be trained in the function and limitation of each item of PPE.

Document controller: RICF

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