



INSPECTION GUIDANCE

HERITAGE RAILWAY RECOVERY PLAN IN RESPONSE TO COVID-19 PLANNED FOLLOW UP BY ORR HMRI

Version 1

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Heritage Railway Recovery Plan and follow up by ORR HMRI

Introduction

1. Following the arrival of the Covid-19 virus in the United Kingdom all 217 heritage railways (which come within the scope of HM Railway Inspectorate (HMRI) within the Office of Rail and Road (ORR)) decided to suspend all operations, close to the public, “furlough” the vast majority of paid staff, and not allow volunteers to work on or enter their respective railways.
2. Such action continues to be significant in helping to minimise the spread of the virus and “to flatten the curve” to allow the NHS to cope with an influx of patients.
3. Many heritage railways closed for the winter after Christmas / New Year period and even for those railways that remained in operation it is normally a quiet period of the year. Thus, by the time the Covid-19 restrictions are eased, for most, if not all, staff it will be many months since they have been involved in operating trains and the public have been passengers. Hence, staff may have become “rusty” whilst traction and rolling stock (T&RS) and infrastructure inspection and maintenance will potentially be in arrears.
4. At some point the country will emerge on the other side. As the UK, Scottish, and Welsh Governments ease restrictions, naturally heritage railways will want to reopen and commence operations as soon as possible. We have produced guidance which we expect all heritage railways to follow.

Scope

5. This document is prepared to be relevant to heritage and museum railways (heritage railways) that operate on their own network. It provides guidance on heritage railway’s health and safety arrangements for re-commencing operations after the extended shut down due to COVID-19.
6. It has been written to assist ORR inspectors in guiding heritage railways during the COVID-19 pandemic; and should also be useful in informing heritage railways’ start up arrangements, reflecting their operational environment.

Purpose

7. To ensure that the pace to re-commence and increase train services is appropriate and to avoid uncontrolled risk, ORR HMRI has produced guidance which we expect all heritage railways to consider as they prepare and implement their start-up arrangements.

Recovery Plan

8. Each railway should:
 - a. Prepare a suitable and sufficient Recovery Plan prior to easing of restrictions, to allow safe recommencement of operations.
 - b. The Recovery Plan should contain a robust Risk Assessment that covers all aspects of reopening after a long layoff.
 - c. The Recovery Plan should be made an integral part of the overall Safety Management System.
9. The Board of Directors of each railway has a key role to play here; ensuring that the railway's managers and heads of department have the resources and arrangements in place to operate safely.

Topics to consider:

Introduction

10. Each heritage railway has a unique operating environment that presents a variety of health and safety risks. Heritage railways' Safety Management Systems should set out their arrangements to identify, assess, and manage those risks, including start-up risks.
11. This document highlights key topic areas that all heritage railways should consider as they prepare to recommence operations. Some railways may have additional topics that they need to consider due to the particular characteristics of their operation. The final selection should be driven by the heritage railway's initial assessment of their operational and safety risk control arrangements, the impact of COVID-19, and how this impacts on the safe start-up of the operations.

Topics

12. **Traction and rolling stock (pressure systems)** intended for use in the initial period must be fit for purpose and compliant with the law. Hence, pressure systems such as boilers and air receivers must be in date as per the PSSR 2000 requirements. *Please see [note from HSE covering this matter](#)*. You may wish to seek further specific guidance from your Competent Persons (Boiler Inspectors).
13. **Traction and rolling stock: (mechanical)** must undergo examination / inspection in accordance with the schedules, policies, standards etc. contained within the SMS and appropriate records kept: such examinations being undertaken by competent personnel.

(Corrosion and electrical issues may have accelerated due to a long period out of use, ingress of rain etc., lack of ventilation, brake system effectiveness etc.).

14. **Engineering workshops:** after the extended closure period, railways must assess whether electrical equipment continues to be assured as safe; and that lifting equipment is still in date as regards LOLER 1998. If not it should not be used pending statutory examination.
15. **Infrastructure:** whilst it is likely that most of the structures (bridges, tunnels, retaining walls etc.) will not have overdue inspections / examinations, the railway should confirm the inspection / examination status of each structure. Where structures do not have a valid, in date inspection / examination, the railway should ensure that a competent person undertakes a risk assessment and records their findings. A full examination may not be immediately necessary if the structure inspection or detailed examination is just a short period overdue and there has been no previous history of problems. However the structure should be inspected visually to ensure that there are no obvious signs of distress; and arrangements made to schedule the overdue inspection / examination. *Further information on Engineering standards and deviation from requirements is available on [ORR's Covid-19 website](#).*
16. **Sighting:** don't forget that we are well into the vegetation growing season and railways will need to ensure that signal sighting distances and vegetation splays are satisfactory. Particular attention should also be given to signals, level crossings, foot crossings etc. If sighting is deficient the railway must undertake remedial action to restore adequate sighting prior to reopening.
17. **Permanent Way:** track condition can deteriorate with time due to formation or ground movement, vegetation, flooding and other environmental conditions. The condition of the track will be highly important in reintroducing services and it is essential that competent persons (track engineers / patrollers etc.) correctly inspect in accordance with the railway's P-Way standard(s). This should include making any necessary measurements such as gauge, twist etc. Thus, the parameters laid down within the SMS should be used as a base line and suitable and sufficient records of inspections kept before reopening. *Further information on Engineering standards and deviation from requirements is available on [ORR's Covid-19 website](#).*
18. **Route Clearance:** the railway should put in place arrangements to ensure that proposed routes are clear of obstacles, and that unstable embankments / cuttings, trees and

vegetation are identified, and made good or remedied as necessary. Not long before the restrictions came into place there were two storms (Ciara and Dennis) that affected many parts of the country and numerous trees were brought down: one such tree resulting in a heritage railway passenger train colliding with a tree – fortunately with no injuries. It has also already been reported that some lines have suffered from fly tipping / supermarket trolleys left by the public and / or trespass / breaking down of lineside fencing.

19. **S&T:** the railway should ensure that all signaling equipment, and the overall system has been inspected / examined in accordance with its standards; and that it is functioning correctly. Any potential wrong side failures must be eliminated. *Further information on Engineering standards and deviation from requirements is available on [ORR's Covid-19 website](#).*
20. **Theft:** ORR HMRI is aware of thefts from heritage railway(s) during the restrictions and railways need to check that all necessary Safety Critical equipment is in place.
21. **Staff Competence & fitness (paid and volunteer):**
 - a. *Valid competence:* all personnel engaged in Safety Critical work must be in date for competence. Competence considerations including for example: Rule Book, Route knowledge, Traction knowledge. Compliance with minimum number of turns could be problematic for some so it is considered best to use the most experienced staff, assuming competence currency can be demonstrated. Any deviation from this advice must be formally risk assessed (e.g. extension of competence assessment intervals) by the railway and reasons and mitigations recorded. We would expect that monitoring of competence arrangements are in place that take into account the Covid-19 social distancing requirements. Further information is available on [ORR's Covid-19 website](#).
 - b. *Medical assessment:* railways should continue to ensure that they have arrangements in place to monitor and ensure the medical fitness of safety critical staff & volunteers. COVID-19 restrictions and government advice may prevent face-to-face medicals and a little latitude may be necessary. The railway could consider introducing a temporary process for monitoring medical fitness if it has safety critical staff/volunteers essential for railway operations with expired medical assessments. Any temporary process should be risk based and informed by competent advice (such as the railway's medical advice). It may include considering extending the review interval taking into

account the individual, the role, and any steps taken to minimise any increased risk. The process must be subject to regular review, and decisions and other relevant information should be recorded. Persons should not undertake safety critical work for the first time until they have been subject to the railway's normal monitoring arrangements. ORR has published specific guidance on the factors that should be considered (see *available guidance* below) and HRA has produced a useful document entitled [Fitness assessment for safety critical workers](#).

- c. *Familiarity*: the railway should consider whether returning safety critical staff remain familiar with their duties. Given the long layoff that many safety critical staff / volunteers have had, many may have become “rusty” and what may have been second nature to them when regularly undertaking their duties may have become less familiar. Thus account must be taken of this; advice is provided in the Operations section below. As always, each railway should be able to demonstrate competence when required to do so as this is a bedrock of a safe operation.
- d. *Personal circumstances impact*: Additionally, consideration must be given to whether or not staff and volunteers may be distracted by stress: e.g. bereavement, financial problems etc. Back to work questionnaires and / or interviews may be required.
- e. *Further information on Medical fitness and Competence Assessment is available on [ORR's Covid-19 website](#)*.

- 22. **Operations**: there is an old maxim “walk before you run” and this is appropriate to the situation that railways currently find themselves in. Each railway will be re-starting from a “cold” position, and the recovery plan should take account of this. So, once maintenance and competence are addressed; there must be sufficient core staff available (railways must not operate if they are unable to cover all necessary Safety Critical posts);
- 23. **Operational Instructions and notices**: the railway should review operational instructions and notices to ensure that they remain relevant and take account of any changes the railway has made since it suspended operations. This would include considering the impact of any changes the railway has made due to COVID-19 restrictions (e.g. reduced crewing of trains).

24. Operations Factors for consideration:

- a. Railways are advised to run some “shakedown” services without passengers. These could be for a few days to the basic (low season) timetable to get everyone back into the swing of things.
- b. When ready, each railway could invite the public to attend as passengers but on a simple timetable. If this proceeds in order and the railway is ready, then move to a more complex timetable / two train running etc.
- c. As experience is regained in a more complex timetable consider moving on, say, to high season operations.
- d. If a railway is considering opening with a gala or major event, ORR HMRI would expect very robust arrangements to demonstrate that such activities can be operated safely. What ORR HMRI would have problems with is moving straight into a gala or major event without going through some robust refamiliarisation.

Management of Covid-19

25. It is likely that some form of social distancing will remain in place for passengers and staff / volunteers. Beyond the risks associated with an extended shut down period, the principal challenge railways face will be how to manage the impact of social distancing requirements for both of passengers and staff / volunteers.
26. Controls are likely to include minimising the numbers of staff / further volunteers whilst maintaining safety, implementing physical controls (barriers, screens etc.), social distancing, good hygiene, and clear messaging. Exact requirements will evolve as UK, Scottish, and Welsh Government’s requirements, advice and guidance reflects the emerging infection risk.
27. The Government, PHE, and ORR publish guidance to assist, including ORR’s sector specific [Practical guidance for operators on implementing COVID-19 public health advice on trains, trams and stations.](#)
28. This will be supplemented by further guidance in due course setting out principles for five key topics: overall social distancing; stations & platforms; on train (driving cabs & saloons); maintenance (fleet and infrastructure); and office environments and operating floors (ticket offices, signal boxes, Controls, general offices). Whilst these principles are developed for a heavy and light rail operating environment, they are equally valid for heritage operations.

29. Areas to consider:

- a. *Impact on operation:* Railways should assess how they manage the impact of COVID-19 risk, and apply social distancing (and other controls) taking account of current guidance:
 - On stations and platforms
 - On board train
 - Passengers
 - Guard, ticket collectors; canteen / bar etc.
 - Footplate crews
- b. *Maintaining cleanliness requirements:* Railways should assess the need for deep cleaning before reopening, where and by whom. Railways should undertake COSHH assessments for biological hazard(s) and for use of cleaning chemicals;
- c. *Cleaning:* Railways should institute suitable cleaning regime for operation – for example of coaches, offices, waiting rooms, lavatories etc. Focus should be on high-traffic touch points such as doors, buttons etc. COSHH assessment is necessary for both use of cleaning chemicals and for biological hazards, including Covid-19 itself;
- d. *Hygiene:* Arrangements for staff and passengers to ensure personal hygiene on railway premises must include consideration of the availability of hand washing facilities/anti-bacterial hand sanitiser gels etc
- e. *Responding to symptoms:* Railways should consider their arrangements for dealing with manifestation of symptoms amongst workforce or member of the public.
- f. *High risk vulnerable staff:* Railways should consider whether they have identified all high risk vulnerable staff (according to government guidelines; such as those aged over 70 with pre-existing health conditions) and put in place suitable arrangements, including self-isolation.
- g. *Best practice:* Railways should consider how to keep up to date with new government guidelines that have been introduced with the release of the lock down e.g. requirements for use of PPE if social distancing cannot be maintained, e.g. during P-Way work.
- h. *PPE:* in this context this includes face masks and face coverings. Railways must assess what is required (taking account of government guidance); how to supply it; and how to safely dispose of it (particularly disposable PPE). Railways should consider the impact of Covid-19 on the availability of Personal Protective Equipment as necessary e.g. for engineering works not just for biological hazard;

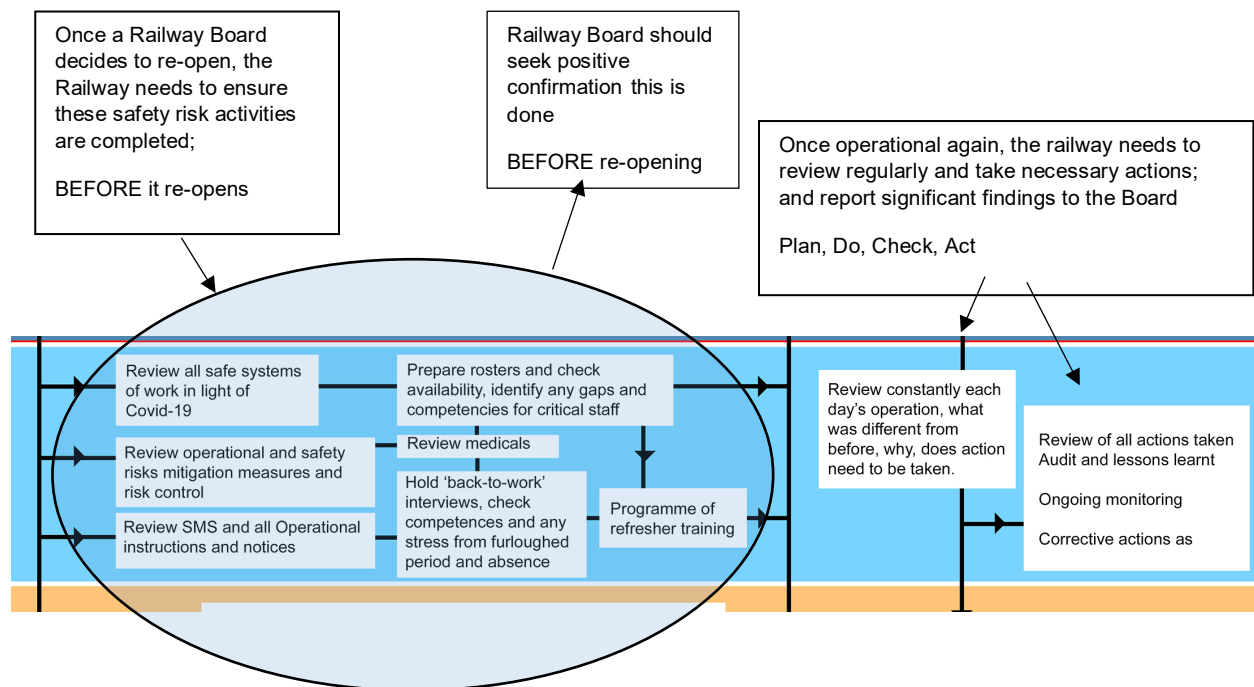
Ongoing monitoring + reporting

30. Railways should review each day of operation – what went well, what needs to improve, how that improvement will be achieved and who will be responsible for implementing (and separately monitoring the implementation of) necessary measures?
31. Consider also how the output of monitoring activity will be reviewed, and findings/recommendations reported to the Board and senior leadership, and acted upon.

Summary:

32. **In essence.** There should be no diminution in health and safety standards for vehicles in traffic, infrastructure, competence etc. despite the Covid-19 outbreak. Consideration of risk from Covid-19 exposure at railways being mitigated as above.
33. **The Public:** heritage railways should be aware that it may take some time for the public to decide that they wish to visit a heritage railway even when all restrictions are eased. Hence, there may be income and budgetary constraints on what is and is not possible for an indeterminate period.

Summary: (in diagrammatic format)



Planned ORR HMRI Activity in Considering Recovery Plans:

34. ORR HMRI's Heritage Team inspectors will be making short but unannounced visits (virtual or site) when restrictions have eased to ensure that:
- a. Recovery Plans are in place and
 - b. Are being followed such that individual railways can demonstrate that their locomotives and rolling stock in use on the day of the visit are running on safe and compliant infrastructure.
 - c. Further, that those in Safety Critical roles (driver, fireman, guard, signaller etc.) can also be shown as competent.
 - d. That effective social distancing / use of PPE is compliant should restrictions still be in place to some extent.
35. We truly hope that all staff / volunteers and supporting members will remain in good health and that the railways that you all passionately believe in survive to continue to provide a "1950s experience with 21st century standards of safety and service".

Steve Turner (HM Principal Inspector of Railways)

Simon Smith (HM Inspector of Railways)

Ian Skinner (Head of Non-Mainline Railways)

Available guidance:

ORR guidance on *competence & fitness, social distancing in stations and on board trains, and engineering standards; and links to government transport specific advice*

<https://orr.gov.uk/coronavirus-advice>

UK, Scottish & Welsh Government guidance

<https://www.gov.uk/coronavirus>

<https://www.gov.scot/coronavirus-covid-19/>

<https://gov.wales/coronavirus>

RSSB advice

<https://www.rssb.co.uk/Insights-and-News/Coronavirus-pandemic-how-we-can-help-you>



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