

NOTICE BOARD

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Issue 3
23/04/2015
Expires: 22/04/2016
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NETWORK RAIL - SIGNAL ENGINEERING Signalling alterations/renewal: 'Taking reasonable opportunity'

Purpose

There are a number of occasions which have come to the notice of the Professional Head (Signalling) where the implementation of risk control measures has not been undertaken when designing renewal or alterations to Network Rail's signalling systems. This mostly relates to occasions where a partial renewal or alteration is being undertaken.

The purpose of this Notice Board is to remind all those involved in remitting and specifying work on signalling systems that they have an obligation to take 'reasonable opportunity' to make improvements to the control of risks. This is required in law, the CDM regulations, is explicitly stated in the CP5 signalling policy and supports the 'Safe by Design' initiative.

Background

There is a belief among some staff involved in the above activities that perpetuating existing arrangements is acceptable.

A number of applications for derogation are received where it is claimed that the improvement is not reasonable. In many cases the cost or timescale implications of making the improvement is significantly greater than it would have been if the opportunity to make the improvement had been considered earlier in the project lifecycle.

The Professional Head (Signalling) is placed in the situation of making a judgement of whether to grant the derogation based on implications for the project at a late stage in its lifecycle, whereas the proper consideration of such a request should be based on the cost/timescale implications of making the improvement if it had been considered at the appropriate stage.

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The expiry date of this NB has been extended, no technical changes have been made.

Originator's Details:-
Jeremy Morling
Professional Head (Signalling) – Network Rail
jeremy.morling@networkrail.co.uk

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Issues for Consideration

The potential for non-compliance in many cases should be identified at an early stage in the project life and due consideration given to the implications. Future applications for derogation should include an assessment of the cost and timescale implications of undertaking the change as part of the normal process of project development and design.

Another example of failure to properly consider the opportunity for improvement is where testing; for example of interfaces, extends into an area not directly affected by the work itself. Testing staff may raise a log drawing attention to a non-compliance with current standards. This is foreseeable and any required safety improvement should be captured as part of the project remit rather than an afterthought of the work.

Often a consistency argument is put forward for retaining legacy functionality where a partial change in an interlocking or workstation area is being undertaken. When the remaining asset becomes due for renewal the consistency argument is applied again to retain legacy standards and no improvement in control of risk is achieved across the whole scope of the renewal. The opportunity for improvement is therefore lost for a whole system/equipment lifecycle, possibly many years.

It is no longer acceptable to perpetuate situations where known weaknesses rely on procedural mitigations rather than an engineered solutions. Signalling assets last for many years but society's expectations of safety has moved on. Procedural mitigations rely on the human beings to provide mitigation, the general public and our stakeholders no longer find this acceptable.

The Inspectors of the Office of Rail Regulation have indicated that this is one area they intend to consider in their programme of inspections.

Action Required

That all staff responsible for remitting or specifying works on the signalling system shall consider 'reasonable opportunity' to provide risk control measures as part of their work. This supports the 'Safe by Design' initiative.

Staff to be Informed

Role	Responsible for Briefing
Route Asset Managers [Signalling]	Author
Signal & Telecoms Maintenance Engineer	Route Asset Managers [Signalling]
S&T Trainers (Workforce Development Specialists)	Author
Head of Engineering, Infrastructure Projects [Signalling]	Author
Signalling Project Engineers/Managers	Head of Engineering, Infrastructure Projects [Signalling]