

Rail Plant Association Update

RPA Acting-Chairman Darren Matthews reports on the current initiatives of the association for road/rail plant owners.

Welcome back. Before we begin, can we say a big thank you to those who commented on our last article. After a detailed risk assessment, bow tie analysis, SWOT and PESTLE, we took a chance to write about the On-track Plant Operating Scheme (POS). Knowing how opinionated some folks are around this subject, it was touch and go whether to publish the RPA's 'take' on the topic. However, your feedback was very positive and we want you to know it is appreciated.

Operational challenges

The avid readers among you may recall that the RPA has been writing about plant providers' operational challenges. From an On-Track Plant (OTP) provider's point of view, we have written about challenges such as transport ('movement order' challenges), POS, delivery and collection point management, loading and unloading low loaders and lorries, and OTP maintenance.

In this article, we will touch on a very important topic which affects us all - fatigue management. Or more specifically, the latest Network Rail Standard on Fatigue Risk Management, which we believe will drive a significant culture change in railway infrastructure working.

Before we start, let us take a minute to reflect on our legal obligations. It is legally binding that we follow the laws of the land. There are many acts and regulations affecting all work environments, and additional industry specific ones that are relevant to those industries. We also have other binding documents to comply with - standards. These can be industry standards (readily available from the Rail Safety and Standards Board (RSSB) and Infrastructure Manager Standards, such as those required to work on the Network Rail or London Underground infrastructures, which are available from a variety of sources.

As you know, routine standard changes occur on a quarterly basis. On the whole, changes to standards cause very little disruption. However, every now and again, a new standard is introduced or changed that has a big impact on us. The latest Network Rail Standard NR/L2/OHS/003 - Fatigue Risk Management - is doing just that.

NR/L2/OHS/003 issue 8 - Fatigue Risk Management

This 13-page standard came into publication on 1st June 2019 and is supported by three separate modules which focus on Fatigue Risk Principles (Module 1), Design Roster and Work Patterns (Module 2) and Exceedance Management (Module 3), all of which were released at a similar time in 2019. What determines this standard to be different from others is the seemingly distant compliance date, 29th October 2022.

That is two-and-a-half years. Surely, we have got more than enough time?

Some businesses may believe they have this covered and see no reason to address this until closer to the compliance date. Well good luck to you with that one. For most of us, this standard will drive a significant culture change and we all know cultures do not change overnight.



Why are we having to do this?

The Office of Rail and Road (ORR) is applying demands on infrastructure managers to get fatigue risk under control. Many accident investigations have concluded fatigue to be a root cause. Fatigue is an adverse health issue that can also lead into more severe health problems if left unchecked.

What we do now

Each year, RISQS audits check companies have, and demonstrably follow, a Management of Fatigue Policy. Many will still use a system that sets limits to the number of hours and shifts a person can work on a managed railway infrastructure (inclusive of hours and shifts undertaken outside the railway for some workers). The general limitations followed are:

- A person shall have at least 12 hours rest before work.
- A person shall work no more than 12 hours without taking a further 12 hours' rest.
- A person shall work no more than 72 hours in a seven-day period.
- A person shall work no more than 13 consecutive shifts in a row (Network Rail) or six days in a row (London Underground) without taking a full 24 hours' rest.

This is how we have managed fatigue risk for a long time for all our staff, full-time and part-time alike.

It is worth noting, the OTP operator community has changed over the past two decades. At the turn of the millennium, most OTP operators had a full-time post with their employers. This was achievable in a railway that offered many midweek shifts to support the weekend shifts. The ratio 20 years ago would be close to 90% full-time OTP operator to 10% 'zero hour' operators looking to top up their midweek work earnings outside the railway industry. Today, the ratios have closely reversed. Midweek shifts are few and far between and employers simply cannot afford to keep operators sat at home on pay waiting for that weekend shift.

The point of mentioning OTP operators is relevant. RPA members having to manage the fatigue of their staff, when they frequently only work 1-2 shifts per week for them, is going to become very difficult.

What is different then?

The latest standard states clearly that the HSE Fatigue Risk Calculator has to be used. You can apply in writing to Network Rail for a

variation to use something similar or better, and some companies have already opted for software solutions. Either way, a fatigue risk management system must be used. (Interestingly, the HSE fatigue risk calculator has been in the standard since 2007, but not fully utilised by some businesses).

How to be compliant

Each limit below is a trigger point. When creating your worker rosters, look out for these trigger points and whichever comes first will determine an action. An exceedance is reached when a person:

- Exceeds 60 hours of working in a rolling seven-day period. This shall be classed as a level 1 exceedance.
- Exceeds 72 hours of working in a rolling seven-day period. This shall be classed as a level 2 exceedance.
- A person receives less than 12 hours' break between booking off from their shift/period of duty and booking on for their next shift/period of duty.
- Works more than 12 hours in one shift or period of duty.
- Works more than 13 consecutive turns of duty in 14 rolling days.
- Works when they are expected to exceed a Fatigue Risk Index (FRI) fatigue score of 35 during daytime or 45 during night-time hours.
- Works when they are expected to exceed a FRI risk score of 1.6 (day or night-time working).
- Exceeds 14 hours door-to-door.

Level 1 exceedance requires intervention of a risk assessment and additional control measures. Level 2 exceedances may prevent any further work for that worker until 24 hours' rest is taken.

Remember, 'whichever comes first will determine an action'. You may find four to five nightshifts in a week is not achievable because the nightshift will increase the FRI fatigue score above 45. You must also keep the worker's FRI risk score at 1.6 or below. That number, you will discover, applies to both day or nightshift working and can be exceeded by the first shift back after 24 hours' rest. As we said, a culture change is coming.

The RPA would like to thank Colas Rail UK for its contribution to this article.



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