

CSIRS Outcome Report

Confidential Safety Information Reporting Scheme (CSIRS)

C1020: TOA Safeworking Incident

The issue

On 27 January 2023 OTSI received a notification via the Confidential Safety Information Reporting Scheme regarding a safeworking breach involving a rail operator. It was asserted by the CSIRS reporter that during the response and recovery following an infrastructure failure, a Track Occupancy Authority (TOA) was authorised without the knowledge of the adjacent signalling panel who controlled the signal required to protect the worksite.

While a blocking facility was in place on the signal at the time, it was not providing protection for this TOA, as it was only in place for an emergency power outage that was in effect. The adjacent signaller was not made aware of this TOA until after it was fulfilled. This omission constituted a serious breach of the operator's safeworking procedures by creating a risk that the signal block could have been removed prior to the TOA being fulfilled leaving the field teams unprotected.

The operator carried out a post-incident investigation, but the reporter asserts that the categorisation and follow up following the initial investigation was inadequate and did not reflect the serious nature of the breach. It was also reported that the incident itself did not receive an entry into the operator's reporting system as a safeworking or procedural breach and was only entered into the system as an additional comment to the incident details for the infrastructure failure. This raised further concern over whether this incident was correctly and adequately reported.

The reporter also stated that incidents of this nature are deliberately mis-categorised following investigations by the operator to avoid the necessity to report and act appropriately on safety breaches, which has resulted in a normalisation or acceptance of substandard safeworking practices.

OTSI action

OTSI contacted the operator in writing with the details of these assertions, specifically that the TOA was issued without appropriate assurances, and that the incident had not been reported correctly. OTSI asked the operator to conduct a full investigation into the incident and advise of any safety issues identified and actions taken.

Operator response

The operator advised OTSI that an internal systemic investigation was underway in relation to this incident and the post-incident field investigation and provided OTSI a copy of its initial report on 27 April 2023.

The report addressed the incident initially raised by the CSIRS reporter, and highlighted other aspects of this incident that were not initially known to OTSI, such as a lack of consideration or assurance from either party regarding a train stabled within in the limits of the TOA, incorrect placement of worksite protection, unclear roles and responsibilities, and inadequate pre-work planning. Safety actions to be implemented by operator were not yet in this version of the report.

OTSI action

OTSI met with the operator to discuss the contents of the report and projected timeframe for the safety actions to be delivered by the business.

Operator response

The operator provided a final report on 27 July 2023. The safety issues identified are summarised below:

- Less than adequate application of Network Rules and Procedures by the signaller, network controller and incident response regarding implementing the TOA.
- Ambiguity around the use of operator specific checklists.
- Safety assessment by incident response, including lack of consideration that work would affect track under the control of different signallers, lack of assurance regarding a train stabled within in the limits of the TOA, and lack of information regarding this train in the Worksite Protection Plan.
- Less than adequate application of the Network Incident Management Plan by the network controller and response personnel
- Practice of safeworking incidents occurring after an incident being captured in the body of the original system entry instead of creating separate entries for each incident.
- Incorrect placement of Worksite Protection Markers by response personnel.
- No point clips and locks in the trackside cabinets intended to secure points used for worksite protection.
- No guidance on how to determine which signaller a Protection Officer should contact when requesting a TOA that affects track controlled by more than one signaller.

The operator advised that the following actions were either underway or had been delivered:

- Coaching of relevant personnel who were found to have not performed tasks in accordance with network rules and procedures.
- Instructions regarding checklists and their recommended use updated to remove ambiguity.
- Email correspondence sent to operational staff regarding the use of checklists for work on track procedures.
- Additional safety actions to be delivered along with safety issues and actions detailed in a previous investigation report by this operator to include:
 - A review of the operator's incident management and emergency response working instructions to ensure fitness for purpose
 - Designing a training process to ensure all relevant staff are trained regarding the use of these procedures (initial and ongoing)

- Building into operational assurance processes the ongoing checking of the efficacy of the procedures.
- Additional working instructions for the entry and reporting of incidents into the operator's emergency management reporting system.
- Additional guidance to Protection Officers on who to contact where a TOA affects more than one signaller.

OTSI action

In addressing the safety issues and actions, the operator made mention of a previous incident, with similar findings and actions. To provide context, OTSI requested a copy of the operator's investigation report into the previous incident.

Operator response

The operator provided a copy of this report which OTSI has reviewed. Similar findings included less than adequate application of Network Standards, Rules and Procedures, less than adequate adherence to the Emergency and Network Incident Management Plan and concerns around training of Network Controllers and operations management.

The operator committed to addressing the findings of both incidents through coaching, greater engagement with internal compliance teams, reviews of working instructions to ensure fitness for purpose and the implementation of an operations training project focused on designing and delivering training to operational staff involved in emergency and incident response.

Conclusion

OTSI acknowledges the actions taken by the operator in relation to the key safety issues, specifically the application of Network Rules and Procedures by the signaller, Network Controller and incident response when implementing the TOA, and ambiguity around working instructions and checklists. While OTSI acknowledges the concern raised by the CSIRS reporter regarding the alleged mis-categorisation of incidents by the operator, this assertion was unable to be substantiated as a repeated or ongoing issue. The operator's affirmative action on this issue does address the concern from this incident specifically.

OTSI considers that the completed and pending actions are adequate to address the concerns of the initial CSIRS report. While this report is now closed, OTSI has noted the completion dates provided for the remaining safety actions and will follow up with the operator on the effectiveness of those actions.

OTSI recommends that rail operators maintain vigilance and a proactive approach to incident reporting and adherence to network rules and procedures to prevent a normalisation or acceptance of substandard safeworking practices.

The Confidential Safety Information Reporting Scheme (CSIRS) operates under the provisions of Section 46E of the Passenger Transport Act 1990. It is a voluntary, confidential and non-punitive scheme that enables employees in the public passenger transport sectors of the rail, bus and ferry industries to report safety matters.

OTSI provides feedback to each reporter on the investigation outcomes of a CSIRS report. In selected matters that have significant operational safety matters, OTSI also publishes a CSIRS Outcome Report. For more information on CSIRS, go to otsi.nsw.gov.au