

CSIRS Outcome Report

Confidential Safety Information Reporting Scheme (CSIRS)

NSW Trains passenger service crewed with an on-board staff member not fully qualified to undertake their assigned role

The issue

The Office of Transport Safety Investigations (OTSI) received a CSIRS report that a NSW Trains three car Xplorer service operated with less than the required number of qualified onboard staff (OBS). It was reported that a staff member who acted in the position of an OBS was not fully qualified to carry out that role as required by the NSW Trains' Safety Management System (SMS).

The CSIRS report detailed on 21 October 2023, NSW Trains management directed a trainee staff member to work on an Xplorer service out of Sydney to Canberra without holding the necessary qualifications (the *incident*). The need for the trainee staff member to carry out the role of an OBS arose from a late unplanned OBS member absence.

The report included information that NSW Trains had in place a '*Working Procedure*' that prescribed the minimum number of qualified OBS required to operate the service. The minimum number included a driver and two qualified OBS. The report advised that in the event of an emergency, the unqualified staff member would not have been able to assist with emergency procedures as they were not yet qualified in the role. It was also reported that the management staff who directed the unqualified staff member to work on the service was unaware the staff member was unqualified until after the service had departed Central.

OTSI action

OTSI provided a CSIRS Safety Notification to NSW Trains and requested that an investigation into the matter be undertaken.

Operator response

NSW Trains carried out an investigation into the safety matter and provided additional advice of the incident and their related SMS including the following:

- In 2010 Countrylink¹ carried out a safety risk assessment to determine the minimum number of OBS necessary to operate their passenger services. The safety risk assessment identified a three car Xplorer service required a minimum of 2 OBS and a driver to meet emergency response requirements. The risk assessment also identified the minimum number of OBS required on other NSW Trains service configurations including Xplorer/Endeavor 2 to 4 car train consists and XPT 4 to 7 car train consists.

¹ Countrylink was a subsidiary of RailCorp in January 2004 operating XPT and Xplorer services and later merged with the intercity services of CityRail to form NSW Trains on 1 July 2013.

- The NSW Trains' safety risk register identified emergency response as a control that referenced several Rail Infrastructure Manager (RIM) procedures and its own emergency response plans. OBS positions were identified in those documents. However, the number of those positions (specifically the number of OBS for each NSW Trains service configuration) was not referenced in those documents.
- As at the incident date NSW Trains had a working procedure covering the minimum number of OBS for their services dated 12 December 2016. The procedure was not recognised in the NSW Trains SMS but did specify the minimum number of OBS required for a three car Xplorer service. That number was consistent with the 2010 safety risk assessment which identified the minimum number of staff to meet safety requirements. However, the procedure did not provide specific advice as to the actions required if the minimum OBS levels could not be filled.
- Related NSW Trains SMS operating procedures and other NSW Trains working procedures did not specify the minimum number of OBS required to staff the different NSW Trains service configurations. In addition, those related documents did not specify the applicable level of OBS competency required. The different NSW Trains service configurations included XPT, Xplorer and Endeavor trains of various car train consist numbers.
- NSW Trains defined its learning and qualifications pathways for OBS. That pathways document specified the training and competency assessment requirements to achieve an OBS qualification for their services. OBS were either a Passenger Attendant (PA) being the entry level qualification, Senior Passenger Attendant (SPA) or a Passenger Services Supervisor (PSS).
- NSW Trains used an electronic train crew rostering system to manage unplanned absences. On the day of the incident the rostering system identified the Xplorer service was short by one OBS. The rostering system relied on NSW Trains rostering officers to block out trainee staff from being available to fill OBS numbers on services that fell short of the minimum staff numbers. The rostering system did not automatically exclude a trainee OBS, without any qualification, from being selected to fill a staff shortage position.
- On the day of the incident the Manager responsible for the OBS sought advice to determine if the trainee PA could act as an SPA to permit the train service to run. The question was transferred through three separate NSW Trains staff, before final approval was granted for the trainee PA to act as a Senior Passenger Attendant (SPA). The approval was conditional for the OBS to stay within the buffet car confines. However, that advice was made without the final approval officer being told the OBS member was not qualified at any OBS level. Had that fact been communicated to the final approval officer the trainee would not have been permitted to act as an OBS, with another OBS replacement being sourced or the passenger service cancelled.
- Whilst the trainee PA had not been fully assessed to achieve a full PA qualification, they had completed all emergency response requirements necessary to satisfy the 2010 Risk Assessment. In the event of an emergency, the unqualified PA could have carried out some emergency response actions aligned with their training. However, that fact was arbitrary to the circumstances of how the trainee was permitted to act in the role of an OBS on the day of the incident.

OTSI noted NSW Trains undertook the following actions in response to the findings of its investigation.

- Communicated to all its OBS management staff the following:
 - All OBS crew must be fully qualified to carry out their respective roles when filling rostered and uncovered OBS shift positions.
 - The learning pathway training and assessment activity requirements to achieve PA, SPA and PSS qualifications with trainee positions not being embedded into rostering lines until they are fully qualified.
 - The appropriate escalation process for any questions relating to the qualification status of OBS when considering their competency status to fill uncovered shifts.

Conclusion

Whilst NSW Trains took action to communicate the competency requirements for OBS to fill unplanned vacancy roles, OTSI advised NSW Trains to consider taking these additional actions:

1. Include their minimum OBS working procedure requirements due to unplanned absences within its SMS. The addition of this procedure within the SMS would assist NSW Trains in the dissemination, review and update of the document.
2. Provide additional instruction within the minimum OBS procedure to specify what actions are required if the minimum number of OBS cannot be achieved prior to a train commencing passenger service.
3. Review its current safety risk assessment that determined the minimum number of OBS for its train configuration services noting any NSW Trains emergency response incidents that have occurred since 2010.
4. Consider automation of the train crew rostering system to prevent OBS from being rostered into an OBS position they do not have the qualifications to carry out.

NSW Trains advised that it acknowledged the OTSI recommended actions and would review them internally and consider further actions. The matter is now closed.

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