# **Rail Delivery Group**

📚 National Rail

# RDG Guidance Note: Managing the Risk to Passengers and Staff from the Use of Contracted Road Services

RDG-GN-OPS-010 Issue 2 – July 2020



# About this document

#### **Explanatory Note**

The Rail Delivery Group is not a regulatory body and compliance with Guidance Notes or Approved Codes of Practice is not mandatory; they reflect good practice and are advisory only. Users are recommended to evaluate the guidance against their own arrangements in a structured and systematic way, noting that parts of the guidance may not be appropriate to their operations. It is recommended that this process of evaluation and any subsequent decision to adopt (or not adopt) elements of the guidance should be documented. Compliance with any or all of the contents herein, is entirely at an organisation's own discretion.

Other Guidance Notes or Approved Codes of Practice are available on the Rail Delivery Group (RDG) website.

#### **Executive Summary:**

This Guidance Note provides advice on managing risks associated with the use of road transport provided by third parties for conveyance of passengers and staff.

#### Issue Record

Issue	Date	Comments
1	April 2012	Original Document – updates and replaces ATOC/GPG002 which is now withdrawn
2	July 2020	The document has had a major updated in line with industry experience and legislation. This includes strengthening guidance on accessibility and the introduction of GDPR. The document has been put into the RDG format with black line to show changes

This document is reviewed on a regular 3-year cycle.

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# Contents

Abou	It this document	2
Expl	anatory Note	2
	cutive Summary:	
	e Record	
1 F	ents Purpose and Introduction	4
1.1	Purpose	
1.2		
1.3	Definitions	
2 F	lealth & Safety Responsibilities and Legal Position Health & Safety Responsibilities	5
2.1	Accessibility legal position	
	0 Step Road Risk Collaboration Programme	
	Janagement and Operation of Road Vehicles	
4.1	Overview	
4.2	Planned Bus/Coach Replacement	7
4.3	Unplanned (Emergency) Rail Replacement	7
4.4	Accessibility to Rail Replacement Services	7
4.5	Fatigue	8
	Anagement and Operation of Road Vehicles	
5.1	Overview	
5.2	Accredited Supplier List	
5.3	Authorisation Arrangements	
5.4	Instructions to Suppliers	
5.6	Staffing of Services	
5.7	Welfare of Staff Involved in Road-Rail Replacement Arrangements	
5.7	Review of Suppliers	
6 l	Jse of Private Vehicles	0
	Control of Vehicles on Railway Premises	
8.1	Data	
8.2	Road rail replacement review	
9 5	Sources and Further Information1	1
Арре	ndix A - Sample Risk Assessment1	3
Appe	endix B - Guidance for Railway Staff1	4

# **1** Purpose and Introduction

#### 1.1 Purpose

Railway Undertakings frequently contract with third party suppliers - both bus and taxi operators - to provide road transport for passengers and/or staff. This may be on a regular, routine basis or in response to planned or emergency disruption to rail services.

This document is intended to assist Railway Undertakings to meet their obligations to identify and control risks to both their own staff and the public arising from such uses of road transport.

It does not claim to cover every eventuality that might be faced but does provide an indication of areas to be considered and some answers to common problems.

It is not intended to cover risks associated with staff use of their own or company owned or leased road vehicles, in respect of which attention is drawn to HSE publications HSG136 Workplace Transport Safety and INDG382 Driving at Work. It is intended to produce a separate Guidance Note to cover this for TOCs.

#### 1.2 Introduction

Road Risk is one of the 12 risk areas in Leading Health and Safety on Britain's Railways strategy where the industry works together to make sure that the railway system is managed effectively to reduce risk to our staff, our passengers and the public. Work related road driving is one of most dangerous activities undertaken by the rail workforce. During the last 10 years there have been 18 workforce fatalities and of these 9 were work-related road deaths. 50% of all workforce fatalities. These have not been related to the use of contracted road services however the risk level is high.

While the use of road vehicles is outside the scope of Railway Undertaking Safety Management Systems, it does fall within the broader definition of risks under a duty holder's control. The general health and safety duty applicable to a body conducting an undertaking is to ensure that anyone who may be affected by the undertaking is not exposed to risks to their health and safety, so far as it is reasonably practicable.

While it is clearly not possible for a Railway Undertaking to directly control risks associated with the use of road transport by its passengers or staff if this is provided by an outside agency, it should take reasonable steps to ensure that such risks have been identified and are being managed by that agency.

#### 1.3 Definitions

Term	Definition in the context of this document		
Bus	A public service vehicle without luggage facilities, defined as a bus on the vehicle Certificate Of Initial Fitness.		
Bus Controller	Staff member employed to control movements of buses, coaches and minibuses at rail to road interchanges normally at stations.		
<b>Coach</b> A public service vehicle with luggage facilities, defined as a coa the vehicle Certificate Of Initial Fitness.			
Certificate of Professional Competence (CPC) All professional drivers of buses (including minibuses with 9 se more) and coaches are now required (by the DVLA) to be in poss of a CPC which they must carry when driving and be able to prov request. The CPC requires all professional bus, coach (and drivers to complete a minimum of 35 hours periodic training every years for as long as they wish to continue driving professionally.			
Equality Act (2010)	Comprising of a number of regulations and acts, the Equality Act (2010) came into force replacing several acts including the Disability Discrimination Act (1997).		
GDPR	The General Data Protection Regulations (2018).		

Managing the Risk to Passengers and Staff from the Use of Contracted Road Services RDG-GN-OPS-010 – Issue 2 – July 2020

Minibus	This is a public service vehicle without luggage facilities, defined as a bus on the vehicle Certificate Of Initial Fitness which has 16 seats or less.
PSV	Public Service Vehicle.
PSVAR <i>or</i> Public Service Vehicle Accessibility Regulations	Public Service Vehicle Accessibility Regulations 2000, integrated into the Equality Act (2010).
Rail Replacement Vehicle	Rail Replacement Vehicle includes bus, minibus, coach and taxi which can provide road replacement for rail services.
SMIS	Safety Management Intelligence System which is used to monitor industry safety performance.
Тахі	Taxi or a cab, is a type of vehicle for hire with a driver, used by a single passenger or small group of passengers, often for a non-shared ride. A taxi conveys passengers between locations agreed by the Railway Undertaking.

### 2 Health & Safety Responsibilities and Legal Position

#### 2.1 Health & Safety Responsibilities

A general health and safety duty applicable to a body conducting an undertaking is to ensure that anyone who may be affected by the undertaking is not exposed to risks to their health and safety, so far as it is reasonably practicable. This applies for both staff and passengers and includes their conveyance by both rail and contracted road services.

It should be remembered that a Railway Undertaking retains overall responsibility for the health and safety of its employees at all times when they are engaged in company business. This clearly includes during the course of any journey they are required to undertake as part of their duties, even if this involves use of another company's staff and vehicles. Appendix A provides a sample risk assessment for the use of rail replacement road vehicles. It should be noted that the ORR has in 2019 prosecuted a rail company when their staff had an accident when driving back from undertaking work.

In addition, the Corporate Manslaughter and Homicide Act 2007 applies to driving for work, and consequently charges of corporate manslaughter are possible in the event of work-related road deaths. So, too, are charges of gross negligence manslaughter against individuals.

The Rail Industry Road Risk Resource Centre has been developed by RSSB in partnership with Highways England's Driving for Better Business (DfBB) team, to offer rail organisations a comprehensive resource to support the effective management of occupational road risk across the rail industry and supply chain.

#### 2.2 Accessibility legal position

The Public Service Vehicles Accessibility Regulations (PSVAR) 2000 and the Equality Act 2010 aim is to ensure that all "regulated public service vehicles" are accessible, safe and comfortable for disabled persons including wheelchair users. The legislation has been interpreted that all vehicles from January 2020 need to be accessible rather than ensuring accessible provision and is in discussion with DfT and implementation has been delayed until 31 December 2020 at the time of issue.

Disability Discrimination Act (1997) or the DDA, which has been replaced by the Equality Act (2010) and hence is not now relevant.

## 3 10 Step Road Risk Collaboration Programme

The rail industry has been working on a 10-step process for road risk collaboration which provides a framework for Duty Holders to use to consider their wider risk on road risk to improve awareness of work-related road safety within each organisation and to encourage the sharing of learning and good practice across the rail industry

The ambition is to promote collaboration and continuous improvement in how organisations think about work related road safety in relation to operational activities.

To reduce the impact of road risk to each rail industry organisation; to those who travel by road for work purposes and to demonstrate the business benefits of managing work related road safety more effectively.



# 4 Management and Operation of Road Vehicles

#### 4.1 Overview

Where road transport is provided by an outside supplier, many responsibilities concerning the management and operation of the vehicles involved clearly rest with that supplier. However, the Railway Undertaking retains a duty to have adequate procurement and checking arrangements in place. This is ideally via a supplier assurance arrangement.

HSE publications HSG136 Workplace Transport Safety and INDG382 Driving at Work provide detailed guidance on road vehicle management. As far as is appropriate and practicable, Railway Undertakings should ensure that suppliers of road transport manage their operations in a manner broadly consistent with their content. Particular consideration should be given to their policy in the following areas:

- i. Driving Licences all drivers should hold an appropriate licence for the vehicle being driven.
- ii. Driver Certificate of Professional Competence (CPC).
- iii. Drink Driving drivers should be subject to Drugs and Alcohol policies at least as restrictive as those appicable to train drivers.
- iv. Rest Periods drivers should be both permitted and required to take appropriate rest periods on long journeys.

- v. Maintenance and Repair vehicles should be subject to an appropriate structured maintenance regime. Repairs should be undertaken by suitably qualified staff or suppliers.
- vi. MOT Where required, vehicles used should have a current certificate of roadworthiness.
- vii. Driver Competence how driver competence is ensured, managed and developed.

#### 4.2 Planned Bus/Coach Replacement

The planning of road replacement services is vital to ensure their safe and efficient deployment. This is linked to the planning of railway infrastructure engineering work which will need to consider station locations so that buses and coaches can connect with trains as part of the plan when required. This should include locations where there is space to manoeuvre vehicles and be able to hold other vehicles where there are multiple departures. Each interchange will need to be able to support all passengers, taking into account visible and hidden disabilities. Each interchange should also consider any alternative arrangements that might be required. A risk assessment of the location will be required, and mitigation provided such as restricting the parking. It should be noted that in some locations using alterative train services and service buses may be more appropriate.

Information on the loadings predicted (including events such as football) based on normal service loads adjusted for engineering works and on previous engineering work on this route. The loadings will provide the number of buses/coaches required for each departure. The level of staffing at each bus/coach interchange should be assessed and needs to include bus controllers, staff to support bus/coach movements and customer service.

The route that is to be used should be agreed with the transport supplier so that robust timings are provided and any infrastructure risks such as low bridges or restricted turns are avoided.

A collaborative approach with suppliers of rail replacement in the planning of services is found to provide the most effective way on minimising risk in the planning of rail replacement.

#### 4.3 Unplanned (Emergency) Rail Replacement

Road rail replacement will be needed to cover for unplanned disruption to services. The contract for the supply of rail replacement vehicles should include ability to request alternative transport with clear responsibilities on who can call them out.

The risks of unplanned rail replacement need to be assessed to mitigate risks such as drivers not having local knowledge.

Where known risks exist for each station, individual "Vehicle Access Profiles" should be drawn up to identify the planned ingress/egress for vehicles, taking into account key activities such as roll on/roll off vehicle loading, access to trunk routes and vehicle length/height restrictions.

Control or the local station should provide a proforma which provides the authorisation to the supplier of a rail replacement vehicle and local requirements and restrictions.

#### 4.4 Accessibility to Rail Replacement Services

Equality for passengers with disabilities is defined within the Equality Act (2010). Although the PSVAR focuses strongly on wheelchair access, full and proper regard must be given to all passengers who identify as being disabled. Passengers with assistance animals, hearing impairments, neurodiversity, learning impairments, toilet facility requirements and mental health requirements must be able to travel without their journey experiences being impacted on.

Rail replacement is often stressful for able bodied passengers. This can worse for passengers who need additional support. The ideal is that the interchange point can should be selected so that passengers are able to move from the train to the bus and vice versa. The plan and operation should include the ability to make this smooth and stress free for passengers with disabilities. Support staff should be empowered to ask a passenger what is required to enable the interchange to be smooth and comfortable.

The accessibility requirements should include consideration of passengers boarding and alighting, luggage handling and any other relevant requirements as appropriate for the passenger's needs. Accessible toilet facilities should be included in consideration of the best interchange location.

The Passenger Assistance system allows passengers to pre-book assistance. This should be used to identify potential requirements. Passengers can be contacted in advance to seek advice as to the right vehicle required in relation to their travel needs, if appropriate It should be noted that only a proportion of passengers will use the Passenger Assist system.

#### 4.5 Fatigue

Fatigue is one of the biggest hazards faced by occupational road users. As such, companies contracted to supply road transport should be required to demonstrate their acknowledgement of the issue, understanding of the influencing factors and action taken to manage and mitigate the associated risks.

It is important to include controls in relation to driver fatigue within any procurement and supplier accreditation process for the provision of road transport. Whilst the bus industry is well regulated in terms of control of driver hours by provision of tachographs, the taxi industry is not and so consideration should be given to the methods by which taxi supply firms ensure that limits are set on driving times for their staff within an occupational road risk strategy.

### 5 Management and Operation of Road Vehicles

#### 5.1 Overview

The use of road vehicles is an integral part of overall rail operations. PSV and taxis are used regularly on timetabled services such as rail-air links and conveyance of train crew respectively, while both are also used on an occasional basis to provide replacement services during engineering works or service disruption. Risks emanating from movement on station forecourts are covered in part 5 of this document. For control of other associated risks, the following considerations may be beneficial.

There are other considerations outside the scope of this Guidance Note, e.g. off-charging costs as well as publicity and other customer service aspects.

#### 5.2 Accredited Supplier List

An accredited supplier list will reduce the opportunity for unsuitable bus or taxi operators to be used. Only those suppliers who are accredited should be selected. In respect of taxis, all suppliers must be licensed providers. Contracts are also likely to exist between the company and the taxi firm(s).

It is recommended that suppliers should be part of a regional accreditation scheme supported by Trading Standards if appropriate.

#### 5.3 Authorisation Arrangements

Railway Undertakings should have in place clearly defined arrangements stating who within their organisations has authority to procure the hiring of buses and taxis whether on a planned (as is generally the case in connection with engineering works) or unplanned/emergency basis (e.g. in the event of train cancellations, late running, infrastructure problems, etc.) and under what circumstances.

#### 5.4 Instructions to Suppliers

The person responsible for ordering buses or taxis should ensure that the supplier and the individual drivers are given clear instructions regarding:

i. The type and capacity of vehicles to be used.

- ii. The number of vehicles required (taking into account expected journey times, contingency for delays both to road vehicles and connecting train services and the need to minimise the risk of over-crowding). The trips are normally numbered with the scheduled trip displayed by the vehicle.
- iii. For buses in particular, the route to be taken (taking into account low bridges if double deck vehicles are to be used, road widths, requirements for buses to turn, etc.). This will be a joint agreement using the supplier's knowledge and ultimately will be the supplier's responsibility. Particular care should be taken to ensure that Satnav systems are either turned off or have been suitably programmed to ensure that they do not direct drivers along routes inappropriate for the vehicle being driven, most obvious is the need to avoid low bridges.
- iv. Precise stopping places (e.g. 'station forecourt at Charlbury' and not a bland 'Charlbury').
- v. Undertaking of station/platform searches for potential passengers to be picked up.
- vi. Emergency and general telephone numbers for contact with Railway Undertaking personnel at starting, destination and intermediate points.
- vii. Times and frequencies of operation if multi-trip.
- viii. Staffing required including bus controllers, bus operating staff and customer staff.
- ix. Agreed operational arrangements at stations.
- x. Confirmation of safety arrangement including passengers requested to wear seat belts (where fitted).

#### 5.6 Staffing of Services

When either planned or unplanned bus or taxi services it should be evaluated the need for and if necessary, provide additional staff to coordinate vehicles and the interchange of passengers between road and rail services. There are six key areas of risk that should be evaluated to allow suitable arrangements to be implemented:

- i. provision of information to passengers advising passengers, either in person or via CIS/announcements;
- ii. boarding/alighting arrangements escorting passengers to and from buses or taxis and platforms at all stops;
- iii. interchange management of transfer between rail and road transport, including holding of connections, authorising of bus departures, etc.;
- iv. accompanied articles management/handling of accompanied luggage, pushchairs, etc.;
- v. revenue protection arrangements; and
- vi. control of buses and the movement vehicles at the station.

Particular regard should be given to the requirements at normally unstaffed stations.

More generally, although not related directly to 'safety' issues, effective management of the situation helps to control the risks to passengers (injuries incurred in transferring between transport modes, carrying of luggage etc) and staff (assaults by agitated passengers). Appendix B provides a sample Guidance Leaflet for Railway Staff on Supervision of Buses Used on Rail Replacement Services.

#### 5.7 Welfare of Staff Involved in Road-Rail Replacement Arrangements

The following points should typically be considered in respect of employee welfare when engaged on

supervision duties:

- i. provision access to toilet facilities;
- ii. access to rest facilities (including drinking water);
- iii. personal security taking into consideration location and events such as football matches. Security for staff can also be improved with body worn cameras;
- iv. cash security in the case of revenue protection;
- v. protection from inclement weather (shelter, clothing, etc); and
- vi. communications.

#### 5.7 Review of Suppliers

Railway Undertakings should consider putting in place some mechanism/process for review and audit of supplier standards of safety and service.

### 6 Use of Private Vehicles

The use of private vehicles by employees for the conveyance of passengers is <u>not</u> recommended and a Railway Undertaking will be liable for the actions of its employees. If undertaken as a minimum, confirmation that insurance cover is provided should be established prior to a member of staff carrying stranded passengers and staff members need to be made aware of this.

## 7 Control of Vehicles on Railway Premises

Railway Undertakings should undertake risk assessments relating to the operation of road vehicles to and from station forecourts/carparks. It is recommended that an operational plan is agreed for more complex busing operations. The is following items, though not definitive, are an aid to controlling this risk.

- i. Conflict between pedestrian and vehicular routes.
- ii. Delineation of routes.
- iii. Underfoot conditions (slips, trips and falls).
- iv. Severe weather precautions.
- v. Adequacy of lighting.
- vi. Speed restrictions and enforcement measures e.g. sleeping policemen.
- vii. Provision of mirrors on bends.
- viii. Delineated areas for buses/coaches for roadways and car park.
- ix. Adequate signing.
- x. Designated parking areas/ restrictions.
- xi. Security both of vehicles and from an 'operational security' perspective.

- xii. Access by delivery vehicles (e.g. to tenants).
- xiii. Access for disabled, children, etc.
- xiv. Avoidance of obstruction of track access points, fire exits, etc.
- xv. Blocking-back onto public road.
- xvi. Parking restrictions.
- xvii. Cycle parking and cycle lanes.
- xviii. Links to railway infrastructure such as bridges and level crossings.
- xix. CCTV coverage.
- xx. Control of excess taxis.

### 8 Data and Review

#### 8.1 Data

Incidents and accidents relating to road rail replacement must be entered into SMIS and should be used to analyse and manage safety performance on road transport operation. This should include road accidents, staff and passenger injuries.

The management of loading of buses/coaches to prevent overcrowding or long queues is needed. The numbers of buses/coaches operated, and the loading of each bus/coach should be recorded and used to refine future bus plans.

Any information about a passenger requiring assistance must be treated as confidential/sensitive. Staff must be aware of their obligations under GDPR to protect that information.

#### 8.2 Road rail replacement review

Road rail replacement accidents and incidents should be investigated in line with company processes.

Planned and unplanned rail replacement should be reviewed to improve future deployments.

### 9 Sources and Further Information

The following sources were used in the production of this document:

- i. Procedures provided by various members of the Railway Group.
- ii. 'Talking Shopped' article IOSH SHP magazine April 2003.
- iii. Railway Safety Ltd letter 'Guidance on safety responsibilities of train operators for replacement non-rail vehicles on rail journeys' 19.3.03.
- iv. Miscellaneous material ATOC/RDG Safety Forum.
- v. Croner's Guide Management of Occupational Road Risk.
- vi. Driving Standards Agency (DSA) guidance on Driver Certificate of Professional Competence.

- vii. RSSB Road Risk Collaboration pages
- viii. <u>Driving for Better Business</u> is a government-backed programme to help employers in both the private and public sectors reduce work-related road risk, decrease the associated costs and improve compliance with current legislation and guidance.

The following websites (many of which themselves include potentially useful links) may be of interest:

Brake – the road safety charity

Driver CPC

The Driving Standards Agency

The Health and Safety Executive

The Highways Agency

The Institution of Occupational Safety and Health

Parliamentary Advisory Council for Transport Safety

The Royal Society for the Prevention of Accidents

Railway Safety & Standards Board

The Vehicle and Operator Services Agency

# Appendix A - Sample Risk Assessment

#### Sample Risk Assessment - Use of Rail Replacement Road Transport

ACTIVITY	POTENTIAL HAZARDS	DEGREE OF RISK	EXISTING CONTROLS	ADDITIONAL ACTION REQUIRED
Vehicle Integrity	Road traffic accident, fire, prosecution.	Company specific	Robust procurement processes and pre- qualification of suppliers. Supplier audit. Road Traffic Act.	Complaint procedure for staff. Continuing audit.
Staff Competence	Road traffic accident.	Company specific	Robust procurement processes and pre- qualification of suppliers. Supplier audit	On site monitoring.
Staff working time	Fatigue leading to road traffic accident.	Company specific	Robust procurement processes and pre- qualification of suppliers. Supplier audit. Tachographs for bus drivers.	Continuing audit. Monitoring of the supplier
Staff fitness for duty	Road traffic accident due to impairment through alcohol and/or drugs.	Company specific	Enforcement of drugs and alcohol policy for contractors. Road Traffic Act.	Random monitoring of contractor staff for alcohol and drugs.
Route Planning	Driver speeding or lack of route knowledge resulting in road traffic accident.	Company specific	Robust procurement and planning policy prior to planned work. Route plan specific to type of transport used e.g. double decker/single decker bus. Tachographs on buses.	Monitoring by company representative on the day. Complaint procedure for staff.
Transport of Passengers	Slip, trip and fall accidents whilst board and alighting and on-board buses.	Company specific	Staff assistance for boarding & alighting Boarding and alighting to be undertaken at suitable locations. Interior cleanliness of buses and taxis.	Monitoring of accident rates and implementation of remedial actions. Lighting and shelter is assessed
Carriage of dogs or other animals	Driver distraction, bites and biohazards.	Company specific	Policy ensuring that animals are secured and controlled.	
Transport of Staff	Slip, trip and fall accidents whilst board and alighting and on-board buses.	Company specific	Boarding and alighting to be undertaken at suitable locations. Interior cleanliness of buses and taxis.	Monitoring of accident rates and implementation of remedial actions.
Loose item/load	Items hitting passenger/staff in the event of a sudden stop/accident.	Company specific	Luggage to be stored in boot or luggage hold. Vehicle with enough luggage space	Staff are available to help direct and help passenger with luggage

### **Appendix B - Guidance for Railway Staff**

## Guidance for Railway Staff on Supervision of Buses/Coaches used on Rail Replacement Services

### On the Bus/Coach

The principal role of staff travelling on rail replacement buses is customer/passenger assistance.

When railway staff travel on the bus/coach it can be useful to check that passengers are not left on platforms at intermediate stops, particularly those that are unstaffed.

The bus/coach driver is not normally required to check platforms and if railway staff are not on the bus posters will inform passengers of the arrangements at any unstaffed stations.

It is not normal to check tickets on the bus, any ticket checks deemed necessary will usually be carried out as passengers board the bus/coach.

It is unlikely that close supervision of passengers will be necessary but passengers may need assistance with a variety of issues, including the times of connecting services. Therefore it would be useful to have a copy of appropriate timetables to hand.

In order to minimise the risk of accidents, passengers should be advised to remain seated and wear seat belts where provided until the bus/coach stops.

Passengers may ask for help with luggage items and if staff assist with this they should remember their manual handling training.

### Introduction

The purpose of this guidance is to provide information and advice for railway staff who may be required to supervise the use of buses on rail replacement services. The advice is in two parts - supervision of passengers on the bus, and supervision of passengers alighting or boarding (or waiting to do so). Whether rostered on or off the bus the primary role of staff in such circumstances is passenger assistance.

Railway staff should be aware that any disruption to journeys, such as provision of a bus instead of a train for part of a journey, may cause raised tempers among passengers and lead to potential staff assaults. It is very necessary for staff to ensure their own safety at all times and to remember conflict avoidance training.

The bus/coach/taxi driver should have clear route instructions from his company and it is the driver's responsibility to ensure the route to be taken is fit for the bus provided. This should be organised when the contract for the work is awarded and will not normally be the responsibility of staff 'on the ground', although it may be useful to check that all the stations to be covered are actually on the route given to the driver. Any errors or omissions in the route should be reported as soon as possible to the manager responsible for arranging the bus replacement service.

The bus/coach driver will normally check that people boarding the bus/coach have a rail ticket, so staff travelling on the bus will not normally need to check tickets. Obviously the bus coach driver cannot be expected to know rail ticket validities etc., however instances of fraudulent travel in these circumstances are quite rare and would normally be detected elsewhere on the passenger's journey.

### The Bus/Coach Queue

Railway staff appointed to supervise people waiting for buses/coaches on rail replacement services should check that adequate signage is posted to ensure people are made aware of the replacement bus service and where the bus will stop. It may be necessary to make periodic checks on the platforms and elsewhere to ensure people have not missed the signs and/or are waiting in the wrong place.

It is obviously useful to have a good idea of the frequency of bus service that is expected. Passenger information is one of the major reasons for having staff in these positions. A high-visibility vest can make it easier for passengers to see who to consult for information.

It will also be useful to have details of the reason for the rail replacement bus service and the expected duration. Be cautious of giving definite times for commencement of normal services unless you are certain they are correct and will be adhered to.

People waiting for buses should not require close supervision although care may be needed to prevent risks from crowding when the bus arrives. Queues should be managed to ensure that no-one is in danger of being crushed or pushed, also to allow free space so that people alighting from the bus may do so safely.

Care should be taken to direct passengers alighting from buses by a safe route - try not to allow people to cross the road from directly behind the bus.

If tickets are checked as passengers board, anybody without a valid ticket should not be refused travel but directed to the nearest ticket sales point. This may be a booking office or Revenue Staff with portable ticket machines.





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