The Challenges of Social Distancing for Rail

Asks of Government

1. Review of whether current guidance on 2m social distancing in the workplace is appropriate/necessary if alternative safety precautions can be implemented. This should lead to the development of a suite of measures, in consultation with Trade Unions and industry (including SMEs), that provide companies with clear instructions on the precautions that can be taken where 2m social distancing is not practical on an ongoing basis. Employers complying in full with these instructions must be given legal protection against civil and criminal actions alleging non-compliance with the Health and Safety at Work Act or subordinate legislation such as the Management of Health and Safety at Work Regulations or the Control of Substances Hazardous to Health Regulations.
2. Government sourcing of significant quantities of relevant PPE in advance of any announcement that extends the wearing of PPE so that demand can be fully met in the short term followed by rapid ramp up of wholly UK based manufacturing via Lord Deighton's taskforce. The remit of the taskforce might usefully also be extended to sourcing of materials and chemicals for testing.
3. Clear messaging to the general public that reinforces the message that we have been staying at home primarily to protect the NHS (not ourselves) and that the next phase of beating the virus until a vaccine is available requires us all to work together to get the economy moving whilst behaving responsibly and supporting those that are vulnerable.
4. Ongoing support for businesses who have either employees who are classed as vulnerable or who live with people who are classed as vulnerable.

Challenges for the Rail Industry

The rail industry provides an essential service across the UK; it is recognised by government as a key driver of the economy in normal times and is currently being heralded as a catalyst for helping the economy to get moving again as lockdown restrictions are relaxed. The challenges for the industry are however significant and complex; this note provides a high level overview whilst recognising that a huge amount of detailed work is underway between relevant organisations and government departments.

Operators
Operators and Network Rail are working very closely with the Rail Delivery Group to see how they can enhance controls to manage social distancing as demand levels start to increase. However controlling increased passenger flows at stations and on-trains will be exceptionally challenging if current social distancing measures remain in place. A phased return is likely to be the only practical solution, but obviously this then impacts the overall capacity of the railway and subsequently the ability for people to get to and from their place of work (or other destinations such as school/university). Maintaining social distancing also impacts on dwell times at stations with the consequent impact on timetabling.

Freight
Any issues are largely in the terminals and to date the industry has managed to adapt working arrangements to maintain social distancing guidelines. There may, however, be some occasions where trains go 'without a full load' due to loading activity taking longer. This will have an impact on freight capacity together with organisations' productivity. A significant issue is protecting freight routes should passenger operators be required to start running more trains than normal to cope with social distancing on the trains.

Infrastructure
Network Rail have already put in place new standards to address social distancing and they are working closely with DfT on the wider pipeline of work having learnt a lot from the recent Easter works. Key points to note are:
- Some works, where social distancing couldn't be maintained, have been postponed.
- Longer possession times may be required for some jobs in order to comply with social distancing measures. This means work that might normally be carried out over say a weekend may take longer and hence run into weekdays.

Manufacturing and Maintenance Operations
Some manufacturing processes within rail are relatively labour intensive because they are not 'high volume' (unlike say automotive). The challenges here are
- Adjusting the work area/working practices to provide for social distancing and
- Recognising that for some activities 2m distancing is physically just not possible; a simple example being multi-person lifts.

Many companies have already responded by making adjustments in line with PHE guidance. Including:
- Staggered working times (such as shift working, staggered break and lunch times) and controlling access to certain areas e.g. only 2 people allowed in changing areas at a time,
- Increased hygiene provision: handwashing, cleaning protocols etc.
- Supervised /controlled entry and exit restrictions,
- Back to back working for activities within 2m of other people plus use of face masks and additional spacing between work areas or benches and changes to workflows through a factory
- Delivery protocols to minimise or remove contact with delivery personnel.

All of these measures have ramifications in terms of additional costs; be it additional staff shift pay, supervisory costs or reduced productivity/factory throughput. Suppliers including OEMs work on very tight margins so the additional costs incurred through the introduction of the measures mentioned above mean that operating in this way is not sustainable for any length of time and for some companies may not be viable even in the short term. Feedback from companies suggests that productivity is reduced by up to 50% using the above measures.

General Observations
Some companies have elected to close temporarily. This may be because:
- they have interpreted the 2m social distancing guideline as a 'rule' and feel they can't maintain 2m and/or

- they feel they cannot meet the duties imposed upon them under current Health and Safety law, which in any case takes precedence over the above guidelines. The Health and Safety at Work Act, for simplicity, requires employers to protect the health and safety of their employees and others that can be affected by their activities 'so far as is reasonably practicable'. The Act also imposes duties on employees to look after their own health and safety and that of others. Further, there are requirements for risk assessments under the Management of Health and Safety at Work Regulations and the COSHH Regulations.

It only requires one company in a supply chain remaining closed to potentially bring everything else to a halt. Sourcing alternative suppliers isn't straightforward due to supplier approval processes / regulations and standards requirements.

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