

# COVID-19 Competence Training & Assessment Arrangements for On-board Trainers & Assessors

## Summary

The competency management arrangements associated with on-board safety critical staff normally incorporates the need for trainers to provide practical training and assessors to gather related evidence by directly observing staff within the working environment, including driving cabs and other on-board staff accommodation.

It is acknowledged that when undertaking on-board training and assessment there may be occasions when it will not be possible to maintain the 2-metre social distancing guidelines. As a consequence, such activities have been disrupted across the GB mainline network, which is not a sustainable position for the industry to maintain given the importance of this activity in relation to developing and maintaining competency amongst the community of safety critical workers.

This paper has been developed to provide employers with guidance, at a principle level, that if adopted will enable them to address the issues that are currently causing the disruption to on-board training and assessments. However, it must be read in conjunction with the Rail Industry COVID-19 Forum (RICF) *Principles for managing the risk of exposure to COVID 19 to passengers and employees across the GB mainline rail industry* and the related paper relating to *Monitored Training Bubbles*.

## Aim

The aim is to set out an industry agreed set of principles that eradicates the issues currently disrupting on-board training and competency assessment, whilst embracing the guidance published by the UK Government and other recognised bodies and acknowledging the need for employers to satisfy their obligation to do all that is reasonable to mitigate the risk to their employees.

The principles set out a high-level framework that will assure those directly involved in on-board training and competency assessments that employers have adequately consider their safety, health and wellbeing.



# 1. Risk Assessment

The UK Government's [5 steps to working safely](#) already advises employers to carry out a COVID – 19 risk assessment, taking into consideration [HSE guidance](#) and the need to consult with employees and their trade union representatives. However, this is generic in nature, so the following principle has been devised to consider it within the context of on-board training and competency assessments.

It is assumed that railway undertakings will consider the guidance published by the Office of Road and Rail (ORR) relating to [Medical fitness and competence assessments for train drivers and other safety critical staff](#) when evaluating the risks associated with on-board assessments.

## **Principle**

Employers should minimise to as low as reasonably practicable the exposure to the hazard of contracting COVID-19 by those whose roles and responsibilities include undertaking on-board training and competency assessments.

## **Considerations**

- 1.1 Review the need for training to be provided on-board and whether the learning outcomes can be achieved using an alternative approach, such as, through the use of a simulated environment where social distancing guidelines can be maintained.
- 1.2 Review the need for evidence to be gathered through in-cab assessment and where practicable consider alternative methods, such as, the use of unobtrusive monitoring and on-train data recorders (OTDR).
- 1.3 Review the methods used to assess competence to determine if they can be substituted, such as, greater use of simulation. Consequently, there may be a need to review the level of support provided to employees and any limitations applied, such as, newly qualified drivers may be constrained in terms of routes and be subject to more regular assessments and 1-2-1s.
- 1.4 Evaluate the barriers to maintaining the social distancing guidelines of 2-metres, taking into consideration traction specific characteristics and the task / activity to be trained or assessed.
- 1.5 Develop a risk assessment that deals specifically with the hazard of contracting COVID-19 whilst undertaking on-board training or competency assessments and reduce the risk of exposure to the hazard to as low as reasonably practicable.
- 1.6 The contribution precautionary measures may have on mitigating the risk of contracting / transmitting COVID-19 in the context of on-board training or competence assessments (see section 2 of this document).

- 1.7 Consult on the proposed measures with those whose roles and responsibilities include on-board training and / or competency assessments and their trade union representatives.
- 1.8 Communicate the results of the risk assessment, proposed measures and responses to consultation with those whose responsibilities include on-board training and / or competency assessments and their trade union representatives.

## 2. Precautionary Measures

There are a range of precautionary measures that are generic and applicable to society as a whole, which have been well publicised by the Government's campaign '[Staying alert and safe \(social distancing\)](#)'. Furthermore, [Public Health England](#) and the [NHS](#) publish guidance on measures individuals can take to protect themselves and others from the risk of contracting or spreading COVID-19. Whilst this section may pull on this guidance when discussing precautionary measures, it is critical for employers to monitor the sources of such information as they are subject to amendment as the Government relaxes restrictions.

Precautionary measures for the purpose of this document are defined as those measures that may mitigate the risk of contracting and / or transmitting COVID-19, such as, maintaining social distancing (where possible). Precautionary measures do not include personal protective equipment (PPE).

It is assumed that PPE, such as, tight fitting disposable respirators, type FFP2 and FFP3 will not be provided to those whose responsibilities include on-board training and / or competency assessments, as the UK Government are currently reserving face fit testing for health and care workers, and those in industrial settings, like those exposed to dust and other particulate hazards (*ORR, Coronavirus Advice, Online, Accessed on 18/06/2020*).

### Principle

Employers should determine the precautionary measures required to mitigate the risk of contracting and / or transmitting COVID-19 in the context of on-board training and competency assessments.

### Considerations

- 2.1 Cleaning regimes associated with driving cabs or other on-board staff accommodation, including the use of cleaning products that remain active for several hours / days / weeks after application.
- 2.2 Strictly controlling access to driving cabs and other on-board staff accommodation to no more than two people, including the trainer/assessor or trainee.
- 2.3 Amplification of social distancing guidance and targeted briefings that considers the railway context and the specifics of in-cab training and assessment.

- 2.4 Access to hand washing facilities and provision of sanitising hand scrubs and wipes.
- 2.5 Good housekeeping and making provision for the disposal of waste, such as, sanitisation wipes that have been used to clean on-board equipment / controls.
- 2.6 Provision of face coverings, taking into consideration the [ORR's guidance](#), which concludes that in order to provide reassurance and reduce risk of transmission to a colleague that a consistent approach amongst employers is required. The ORR recommends that employers should make provision for the supply of visors, re-usable mask/covering or Type I and Type II surgical masks to employees, where supported by a suitable and sufficient risk assessment.
- 2.7 Promoting the use of self-declarations, where those concerned have confirmed they are not displaying COVID-19 related symptoms.
- 2.8 Managing the interaction between trainers/assessors and others by allocating assessors to a defined group of employees, such as, drivers allocated to a defined driver manager.
- 2.9 Adoption of a 'buddying' system if employees are to spend days / weeks / months together, so as to reduce the risk of transmission, such as, trainer allocated to a cohort for the duration of their training.
- 2.10 Limiting the exposure to situations whereby employees are unable to maintain the 2-metre guideline, such as, planning ahead and determining how the required outcome can be achieved in the shortest amount of time.
- 2.11 Encouraging the use of side-to-side communication and keeping communication to a minimum when it is not possible to maintain the 2-metre social distancing guidelines.
- 2.12 Maintaining airflow in confined spaces by opening windows, where possible.
- 2.13 Allowing sufficient time to prepare for each activity to avoid unnecessary contact with others, such as, entering and exiting the driving cab.
- 2.14 Eliminating the need for those concerned to share equipment or exchange paperwork, where possible.

### 3. Individual Factors

As the Government relaxes restrictions and implements its plan to stimulate the UK economy and encouraging more-and-more of us to return to work, employers should continue to consider those segments of their workforce who are more susceptible to contracting COVID-19 and where necessary make provision to support those employees.

The NHS publishes guidance on the people that are at higher risk of contracting COVID-19, and employers should consider this when dealing with individual concerns raised by those being asked to undertake on-board training and assessments that are likely to result in social distancing guidelines being breached. Employer's considerations may

need to go beyond the employee as there may be evidence to suggest their concerns relate to others they live with, such as, a dependent with an underlying health condition.

### **Principle**

Whilst employees will generally be expected to fulfil their full range of duties, employers should make provision for reasonable adjustments for an agreed period of time if they or someone they live with is either at a high (clinically extremely vulnerable) or moderate (clinically vulnerable) risk if they contract COVID-19. Such arrangements should extend beyond health concerns and also consider anxiety and well-being.

### **Considerations**

- 3.1 Whilst the NHS guidance provides a list of health conditions that identify those within society that may be at a higher level of risk should they contract COVID-19, it should be noted that this list is subject to change and not exhaustive.
- 3.2 If an individual expresses concern about the implications of them contracting COVID-19 as a result of being required to undertake on-board training or competency assessments, then employers should:
  - 3.2.1 Discuss the nature of the concerns and determine if it relates to an underlying health condition they or someone they live with have.
  - 3.2.2 If necessary, make arrangements for the employee to be seen by an occupational practitioner to discuss their concerns and determine their suitability to undertake their full range of duties.
  - 3.2.3 Be prepared to make reasonable adjustments for a defined period of time, which may include restricting the tasks and activities the employee can undertake whilst the risk of contracting COVID – 19 remains high.
- 3.3 Employers should consult with employees to determine if they are satisfied with the proposed arrangements and prepared to undertake in-cab training and assessments. In circumstances where an employee expresses concern and requests to opt out, then the employer should seek to understand the nature of their concerns and allow the employee to opt out without fear reprisal. Such adjustments should be reviewed subsequent to any changes being made to guidance relating to social distancing measures in the Rail Industry COVID-19 Forum (RICF) *Principles for managing the risk of exposure to COVID 19 to passengers and employees across the GB mainline rail industry.*