

COVID-19

Additional Measures

Driver Training & Competence Development

Issue 4.0

Endorsed by RICF: 25 January September 2021



Introduction

Train driver training and competency development has been disrupted during the coronavirus (COVID-19) pandemic in the United Kingdom (UK), as many related activities have been impacted; particularly those where it is not always possible to maintain social distancing guidelines. Whilst it has been possible to pause such activities in the short-term, this is not a sustainable position due to the medium - long term impact this will have on the industry's ability to recover from the pandemic. Therefore, railway undertakings have worked collaboratively with others, including trades unions, to develop a range of mitigation measures to reduce the risk of the COVID-19 virus spreading within the workplace.

Purpose

This guidance describes the additional measures that have been developed and agreed to support the reintroduction of all training and competency assessment activities, where social distancing guidelines cannot be maintained. The content is intended to be used by employers when reviewing their existing arrangements and consulting upon proposed changes with their employees and trades union representatives.

This document consolidates the guidance previously published by the Rail Industry COVID-19 Forum (RICF) and therefore supersedes all previous related guidance notes that were published by RICF.

Scope

This guidance is applicable to railway undertakings that are licensed to operate trains on the GB mainline network and their training and competency development activities covered by the Train Driving Licences and Certificates Regulations 2010.

This includes all employees involved in in-cab training, development and assessment activities where it is unlikely that social distancing guidelines will always be maintained, including:

- assessments
- practical handling
- refresher training (for example, route and traction refresher training)
- rolling stock familiarisation (for example, static traction training)
- route learning and refresher training.

1. Managing the transmission risk

COVID-19 presents a generic hazard and the risk of contracting the virus is one that society will continue to be exposed to for some time to come. Whilst it is not currently possible to eliminate the risk, it is possible to reduce the spread of the virus by following the guidance published by the Government and other recognised bodies. However, employers are required to undertake a COVID-19 risk assessment, the scope of which should include training and competency development, with a specific focus on those activities whereby it is not possible for social distancing guidelines to be maintained.

It is for the employer to determine whether an activity relating to driver training and competency development should continue, which is likely to be driven by legal obligations under the Train Driving Licences and Certificates Regulations 2010, commercial commitments or other business need. However, establishing the justification for continuation of an activity is not sufficient, as this merely allows the employer to distinguish essential activities at a given point in time. Having established the activities that need to continue, the employer should evaluate each activity to consider if current controls need to be amended, enhanced or supplemented to assure themselves that they have done all that is reasonably practicable to mitigate the risk of transmission.

The Health and Safety Executive (HSE) promotes a collaborative approach to risk assessment, therefore employers should actively engage with employees and trades union representatives when reviewing their existing controls. Moreover, employers should consult on proposed changes, satisfy related legal obligations¹ and remain open to other ideas that may emerge as the application of such changes are considered within the operating context of the business.

The topic of training and competency development is one that has been discussed at a national level by the Rail Industry Coronavirus Forum (RICF). As a consequence, a range of *additional measures* were developed, consulted on and agreed with trades unions (ASLEF, RMT & TSSA). These measures, which were trialled by two passenger operators (Arriva Rail London and Greater Anglia) are set out in the following sections in preparation for national deployment. However, in January 2021 the measures were revised to incorporate changes to the testing methodology following a successful trial that sought to develop an effective, sustainable and acceptable testing regime that considered related Government guidance and incorporated new knowledge emerging from research.

¹ Safety Representatives and Safety Committees Regulations 1977 (as amended) and Health and Safety (Consultation with Employees) Regulations 1996 (as amended)

2. General measures

Whilst the scope of this guidance focuses on the additional measures applicable to those whose responsibilities include training and competency assessment activities where it is likely social distancing guidelines will not always be maintained, it is essential for employers to amplify the need for employees to continue to follow guidance on how to reduce the spread of infection by:

- adhering to social distancing guidelines where possible
- washing your hands with soap and water often, for at least 20 seconds
- using hand sanitiser gel if soap and water are not available
- covering your mouth and nose with a tissue or your sleeve (not your hands) when you cough or sneeze
- putting used tissues in the bin immediately and washing your hands afterwards
- cleaning objects and surfaces you touch often using available cleaning products
- wearing a face covering when in shared spaces²
- increasing ventilation by opening windows where possible
- encouraging the use of side-to-side communication instead of face-to-face and keeping communication to a minimum
- allowing sufficient time to prepare for each activity to avoid unnecessary contact with others, such as, entering and exiting the driving cab
- eliminating the need for those concerned to share equipment or exchange paperwork, where possible.

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 training and competency assessment activities where it is likely social distancing guidelines will not always be maintained, 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*).

What should employers do?

Employers should develop a communications campaign that amplifies the importance of the generic measures above.

² The Rail Industry Coronavirus Forum (RICF) have published guidance on the wearing of face coverings by employees.

Employers should assess their facilities to ensure they are COVID Secure in line with Government and other recognised bodies guidelines. Specific factors for consideration include:

- Messroom facilities and their ability to accommodate the anticipated throughput of staff, whilst facilitating social distancing, good hand hygiene and housekeeping.
- Where capacity is unlikely to meet demand then alternative provision should be made to accommodate the needs of employees.
- Utilisation of facilities should be monitored to ensure they remain COVID Secure and continue to satisfy the needs of employees.
- Adequate provision is made for employees to practice good hand hygiene.

Employers should review driving cab cleaning regimes to ensure the risk of an employee coming into contact with a COVID 19 contaminated surface is effectively mitigated. Specific factors for consideration include:

- Frequency of cleaning, which should consider the frequency of use (including change overs during a train journey) and effectiveness of cleaning products used (e.g. active anti-viral solutions that provide protection for a defined period after application).
- Provision should be made for users to be notified of when the cab was last cleaned and when it is next scheduled to be cleaned.
- Provision should be made for the reporting of missed scheduled cleans and corrective action required before a train can enter service. If this includes train preparers and drivers undertaking cleaning of driving controls and equipment, then it must be recognised that sufficient time will be required to avoid service delays.

Employers should make provision for employees to be provided with hand sanitisers and wipes if they are unlikely to have regular access to soap and water.

Employers should make provision for employees to safely dispose of potentially contaminated waste, excluding the use of on-board waste bins.

Employers should evaluate the impact of *additional measures* on diagrams and where necessary make adjustments to facilitate adherence to guidance. Adjustments should be reviewed at agreed points or if circumstances change e.g. service levels change or passenger numbers increase significantly.

Employers should assign a lead manager to maintain oversight of the arrangements and the day-to-day support afforded to employees.

3. Additional Measures

3.1 Participation

Employers should consult with employees on their willingness to participate in any training and competency development activity where it is not possible to maintain social distancing and brief them on the *additional measures* that will be put in place to mitigate the risk of transmission. However, it must be recognised that some employees may express concerns or be anxious about participating in such activities and ultimately may not wish to participate. In such circumstances, employers should be prepared to allow employees not to participate, deferring such activities until a later date. However, such agreements should be reviewed regularly, as overtime employees concerns and their levels of anxiety are likely to reduce.

What should employers do?

Employers should consult with their employees to identify those willing to participate in training and competency development activities where social distancing guidelines cannot be maintained.

Employers should evaluate each employee's suitability to participate, taking into consideration any known health conditions and where necessary making reasonable adjustments. In some instances, it may be necessary to seek advice from an occupational health practitioner.

Employers should consider each employee's personal circumstances to satisfy themselves that any consequential risks can be mitigated before allowing them to participate, e.g. known underlying health conditions within the household, adherence to social distancing measures etc...

Employers should restrict all training and competency development activities where social distancing guidelines are unlikely to always be maintained to a 1:1 ratio. However, employees should be encouraged to use all available space to avoid physical contact. As a consequence employers may need to review their training plans to ensure such activities remain deliverable within the existing timescales, for example, if a cohort includes 4 trainees on a static traction training module, the method of delivery may need to be adapted to satisfy the 1:1 ratio for all in-cab activities, resulting in the training taking longer, the cohort being reduced in size or additional instructors being required.

3.2 Asymptomatic Testing

This section should be read in conjunction with the Government guidance [Coronavirus \(COVID-19\) testing: guidance for employers and third-party healthcare providers](#).

Asymptomatic testing is considered to be a useful tool that can support employers in their endeavours to better manage transmission risk in the workplace, particularly when the workplace setting provides a particular risk (for example, in-cab training, development or assessment activities where it is not always possible to maintain COVID-19 risk control measures).

However, testing is associated with limitations and should therefore only be regarded as a complimentary tool and never regarded as a replacement for those controls that have been put in place to mitigate transmission risk in the workplace, including good hand and respiratory hygiene, social distancing measures and good fresh air ventilation.

Types of tests

There are currently two different types of tests that are clinically proven to be effective at detecting the presence of COVID-19 (SARS-CoV-2), they are:

- nucleic acid tests
- antigen tests

Nucleic acid tests

Nucleic acid tests can detect very specific DNA (*deoxyribonucleic acid*) or RNA (*ribonucleic acid*) sequences. SARS-CoV-2 is an RNA virus, and detection of any RNA with sequences corresponding to the SARS-CoV-2 genome indicate viral particles are currently present. Numerous tests have been developed which specifically identify RNA from the SARS-CoV-2 virus in a sample. Nucleic acid tests can be performed on samples collected from nasal/oral swabs, saliva, pin-prick blood tests or sputum. The presence of viral RNA indicates the subject is currently infected with COVID-19.

Reverse transcription polymerase chain reaction tests (RT-PCR) tests are the most accurate means currently available for detecting COVID-19 infection. They can also detect infection earlier than other testing methods. They currently have a turnaround time of around 24 hours once the sample has been received at the laboratory. However, operational experience has highlighted that the overall time taken to return results can be significantly longer, with some results taking as long as 7 days when the sample has been returned to the laboratory using the Royal Mail priority service. Therefore, it is recommended that employers carefully consider the method used to return samples to the laboratory, as shorter turnaround times are likely to only be achievable when using a dedicated courier service.

RT-PCR tests are so incredibly sensitive, that in some cases they continue to detect coronavirus RNA in subjects who have had COVID-19 and recovered. These results are termed 'false positives'. False positive tests have been recorded in some people up to 88 days after they have recovered from the infection and in many cases have produced antibodies. It is suspected that in these cases, some small pieces of the virus which have been deactivated by the body's immune system have not yet been cleared from the system.

Antigen tests

Antigens are features of the surface of cells or pathogens which the body's immune system can recognise and bind to. If antigens can be detected in a sample, that means the pathogen to which they belong is present, and that the person the sample came from is currently infected with that disease. Antigen testing detects proteins or glycans which are part of the SARS-CoV-2 virus. These are what the body makes antibodies to bind to. Like nucleic acid tests, antigen tests can determine if a person is **currently infected** with COVID-19. Antigen tests can be performed on samples collected from nasal/oral swabs, saliva, pin-prick blood tests, venous blood or sputum. **They are generally quicker than RT-PCR tests, providing results in as little as 20 minutes and are available as self-administration kits.**

Limitations

Nucleic acid or antigen tests are not 100% accurate and **there will always be a residual risk of an infected employee entering the workplace** even though their most recent test was negative. This is most likely to be caused by the employee becoming infected after their most recent sample was harvested, or because the sample was not collected correctly resulting in a 'false negative' or 'inconclusive result'.

Furthermore, the sensitivity of some virus tests (reverse transcription polymerase chain reaction tests (RT-PCR)) can result in 'false positives' being experienced. This usually occurs when a person is tested within 90 days of their illness onset, but after they have completed the required period associated with self-isolation and recovered.

Avoiding false negative or inconclusive results

Employers should carefully select the testing products to be used as part of their testing programme, taking into consideration the ease by which the required sample will be collected, and the level of instruction required. This is particularly important if there is an expectation that the employee will be required to self-administer the test³.

The risk of experiencing either a *false negative or inconclusive result* can be mitigated through product selection and the provision of simple step-by-step instructions, tutorials and employee assistance by trained / competent support staff. Research also suggests that performance in the field improves as experience grows, meaning the risk of such results are likely to reduce over time at the individual level.

What should employers do?

Employers should make provision within their arrangements for employees to be briefed on the testing arrangements being implemented.

Employers should work with test suppliers to develop simple step-by-step instructions that visualise the testing experience. Instructions should be supplemented by online tutorials that can be accessed on mobile devices 24/7, so that employees have access to a common reference point that demonstrates how each test should be administered. Furthermore, employers should make provision for support / advice to be made available in the workplace by having some local managers briefed on the administration of each test by the supplier, manufacturer or medical professional.

Employers should monitor for inconsistencies between test results and absenteeism due to COVID – 19 related symptoms to identify potential issues relating to the correct administration of the test and the effectiveness of the local support and/or briefing and supplementary materials.

Employers should make certain that their workers understand that while these tests are the best tools available for detecting infection, a negative test result only demonstrates the tested sample did not contain enough virus to indicate current infection at that time and is at best a good indication they are not currently infectious.

Avoiding false positive results

If a person who has recovered from COVID-19 returns a positive RT-PCR test without new symptoms during the 90 days after illness onset, this is most likely to be due to persistent shedding of old viral DNA rather than a new infection. Re-testing a person during this period is unlikely to yield useful information, even if that person has had close contact with an infected person. However, if a person becomes symptomatic in that time, and no other cause of infection can be identified, it may warrant an investigation by a healthcare professional of whether they have become reinfected, and they may need

³ Public Health England (2020): Preliminary report from the joint PHE Porton Down & University of Oxford SARS-CoV-2 test development and validation cell: Rapid evaluation of lateral Flow Viral Antigen detection devices (LFDs) for mass community testing [Online]. Available from: https://www.ox.ac.uk/sites/files/oxford/media_wysiwyg/UK%20evaluation_PHE%20Porton%20Down%20%20University%20of%20Oxford_final.pdf [Assessed on 19/01/2021].

to isolate as a result. There is currently no evidence that people can become reinfected with COVID-19 again within three months of initially contracting it.

Therefore, employees returning to work following their recovery from COVID-19 and having completed the required period of self-isolation, should not be subjected to further RT-PCR testing for a period of 90 days from their illness onset; unless they become symptomatic again⁴. This is aligned to the Government / World Health Organisation guidance. However, such employees should continue to be monitored for COVID-19 if they are required to undertake in-cab training / assessment / development activities.

Antigen tests are less sensitive than RT-PCR tests as a higher viral load is necessary for them to detect the virus. The period for which antigen tests are sensitive appears to be more closely related to the specific period for which people are infectious than RT-PCR. Therefore, it is feasible that a negative antigen test could provide extra reassurance in these situations, **but the use of antigen tests in this manner is not clinically validated at present**. However, RICF in consultation with trade unions has been agreed that employers should pilot the use of antigen lateral flow (LFT) tests to test employees returning to work following their recovery from COVID-19 and completion of the period of self-isolation; **but this should be monitored carefully** as a positive result may indicate reinfection and certainly warrants further investigation by a medical practitioner.

What should employers do?

Employers should follow Government guidance and adopt a symptomatic approach to managing employees returning to work following their recovery from COVID-19 for a period of 90 days from the date of illness onset, as defined in government guidance.

Employees returning to work following their recovery from COVID-19 that are required to undertake in-cab training, development or assessment activities within the 90-day period of illness onset, should not be subjected to RT-PCR tests, unless they develop any new symptoms of COVID-19, as this type of test is more sensitive which can lead to a false positive being returned. Instead, the employee should be tested using an antigen LFT test every 7 days, this includes if they are entering a bubble for the first time. However, results should be monitored carefully as the use of LFT tests in this manner is not clinically proven and there is a risk that false positives may be experienced.

If an employee develops new COVID-19 symptoms or tests positive through an antigen LFT test, then they should be notified of the need to follow Government guidance, for example, stay at home, self-isolate immediately and arrange for an RT-PCR test.

Testing arrangements

The implementation of an asymptomatic testing programme to facilitate all in-cab training, development and assessment activities has been agreed by RICF, as it is recognised that such a programme can complement existing measures and provide employees with additional assurance.

The arrangements should be consistent across passenger train operators and follow the principles set out below:

⁴ Government guidance (2021): Stay at home: guidance for households with possible or confirmed coronavirus (COVID-19) infection - After your isolation period has ended [Online]. Available from: <https://www.gov.uk/government/publications/covid-19-stay-at-home-guidance/stay-at-home-guidance-for-households-with-possible-coronavirus-covid-19-infection> [Assessed on 12/01/2021].

- Employers should determine which type of test they intend to use and consult with their employees on the proposed arrangements⁵.
- Employers should brief employees on the arrangements⁶, emphasising any known limitations associated with the testing and that the testing is only provided for assurance purposes.
- Whilst these testing arrangements facilitate in-cab training, development and assessment activities, employers should continue to monitor the need for an activity to take place and wherever possible mitigate the risk of transmission in the workplace by limiting contact between different employees on a daily basis. For example, wherever practicable a buddying arrangement should be used to create a bubble, as this limits contact between different employees and enables the employer to maintain an oversight of in-cab interactions between employees for track and trace purposes.

Short duration in-cab activities

Short duration in-cab activities are defined as those that are planned to be no longer than a single shift/day and often can relate to a single train journey, for example, an in-cab practical assessment ride or route refresher. In these situations, it may not always be reasonably practicable to make provision for an RT-PCR test to be undertaken and the result returned prior to the activity needing to take place, although where possible this should be the aim. However, this does not negate the need for participants involved in such activities to be tested for COVID-19, and employers should make the following provision:

- Instructors, trainers or assessors likely to undertake in-cab short duration activities should be enrolled in an asymptomatic testing programme, which is based on the following principles:
 - Initial test should be a RT-PCR test, as this is currently recognised as the most accurate type of test available. Furthermore, the result of this test must be confirmed as negative prior to an instructor, trainer or assessor being allowed to undertake related in-cab activities.
 - Once the initial result has been confirmed as negative, the instructor, trainer or assessor should be tested again on the first day they are scheduled to undertake related in-cab activities and only allowed to continue if a negative result is returned. This test should be undertaken by a self-administered antigen LFT test, as this allows the instructor, trainer or assessor to administer the test before presenting for duty and follow Government guidance should a positive result be returned.
 - The antigen LFT test should be repeated every 7 days (except during periods of annual leave).

⁵ A recent successful trial conducted during November / December 2020 involving GWR/TfW/LNER demonstrated that a RT-PCR saliva test supplied by HALO Verify and an antigen LFT test supplied by Seren Solutions were effective at detecting COVID-19 and less intrusive than other tests previously utilised. Furthermore, that in field levels of accuracy could be maintained by using the supplier's simple step-by-step instructions, which were supported by tutorial videos and briefing materials.

⁶ Arrangements include the provision for briefing, access to related information including step-by-step guides and the employee support available locally.

- If an instructor, trainer or assessor testing programme is interrupted, resulting in the time elapsed since their last test being more than 7 days then they should be retested using a self-administered RT-PCR test and the result confirmed as negative. However, their participation in related in-cab activities should not be delayed whilst awaiting the RT-PCR result providing they complete the self-declaration and test negative using a self-administered antigen LFT test. Ideally the antigen LFT test should be administered simultaneously.
- Instructors, trainers and assessors should maintain a log of the trains where they accompanied the driver in the leading cab and make this available as defined in the employer's local arrangements. The purpose of this record is to support subsequent enquiries relating to track and trace.
- Drivers undertaking in-cab route learning or refreshing whereby the activity is of a short duration do not need to be enrolled in an on-going asymptomatic testing programme. However, they should be tested for COVID-19 on the day of the planned activity and the test confirmed to be negative before being allowed to participate. The test should be a self-administered antigen LFT test.
- Drivers (including trainees) being accompanied by an instructor, trainer or assessor during a short duration in-cab activity do not need to be enrolled in an on-going asymptomatic testing programme. However, they should be tested for COVID-19 on the day of the planned activity and the test confirmed to be negative before being allowed to participate. The test should be a self-administered antigen LFT test and the result valid for 7 days, meaning no further testing is required should they be accompanied on subsequent days.

Longer duration in-cab activities

Longer duration in-cab activities are defined as those that are planned to last for longer than a single shift/day and often involve two employees spending several consecutive days, weeks or even months together, for example, a trainee driver receiving practical handling training with an instructor. Such activities are normally planned in advance; therefore, employers should make the following provision:

- Instructors, trainers, assessors and trainees likely to undertake in-cab long duration activities should be enrolled in an asymptomatic testing programme, which is based on the following principles:
 - Initial test should be a RT-PCR test, as this is currently recognised as the most accurate type of test available. Furthermore, the result of this test must be confirmed as negative prior to an instructor, trainer, assessor or trainee being allowed to undertake related in-cab activities.
 - Once the initial result has been confirmed as negative, the instructor, trainer, assessor or trainee should be tested again on the first day they are scheduled to undertake related in-cab activities and only allowed to continue if a negative result is returned. This test should be undertaken by a self-administered antigen LFT test, as this allows the instructor, trainer, assessor or trainee to administer the test before presenting for duty and follow Government guidance should a positive result be returned.
 - The antigen LFT test should be repeated every 7 days (except during periods of annual leave).

- If an instructor, trainer, assessor or trainee testing programme is interrupted, resulting in the time elapsed since their last test being more than 7 days then they should be retested using a self-administered RT-PCR test and the result confirmed as negative. However, their participation in related in-cab activities should not be delayed whilst awaiting the RT-PCR result providing they complete the self-declaration and test negative using a self-administered antigen LFT test. Ideally the antigen LFT test should be administered simultaneously.

Route learning

Route learning is normally a longer duration activity; therefore, route learners should be tested as set out in the previous section above. However, the nature of the activity often requires the route learner to travel on different train services over the route, potentially encountering several different drivers. This increases the risk of transmission in the workplace; therefore, employers should make the following provision:

- Route learners should be enrolled in an asymptomatic testing programme, which is based on the following principles:
 - Initial test should be a RT-PCR test, as this is currently recognised as the most accurate type of test available. Furthermore, the result of this test must be confirmed as negative prior to a route learner being allowed to undertake related in-cab activities.
 - Once the initial result has been confirmed as negative, the route learner should be tested again on the first day they are scheduled to undertake related in-cab activities and only allowed to continue if a negative result is returned. This test should be undertaken by a self-administered antigen LFT test, as this allows the route learner to administer the test before presenting for duty and follow Government guidance should a positive result be returned.
 - The antigen LFT test should be repeated every 7 days (except during periods of annual leave).
 - If a route learner's testing programme is interrupted, resulting in the time elapsed since their last test being more than 7 days then they should be retested using a self-administered RT-PCR test and the result confirmed as negative. However, their participation in related in-cab activities should not be delayed whilst awaiting the RT-PCR result providing they complete the self-declaration and test negative using a self-administered antigen LFT test. Ideally the antigen LFT test should be administered simultaneously.
 - Route learners should maintain a log of the trains where they accompanied the driver in the leading cab and make this available as defined in the employer's local arrangements. The purpose of this record is to support subsequent enquiries relating to track and trace.
- Drivers being accompanied by a route learner during a short duration in-cab activity do not need to be enrolled in an on-going asymptomatic testing programme. However, they should be tested for COVID-19 on the day of the planned activity and the test confirmed to be negative before being allowed to participate. The test should be a self-administered antigen LFT test and the result valid for 7 days, meaning no further testing is required should they be accompanied on subsequent days.

- Employers should adopt a structured approach to route learning and limit the number of in-cab interactions between a route learner (including route refresher) and other drivers to a minimum on a daily basis; ideally through the adoption of a buddying arrangement.
- It is normal for train operating companies to request access to driving cabs for the purpose of route learning or route / traction conducting. Such requests are normally made / agreed in advance. However, before agreeing to provide access to another operator, employers should notify the other operator of their cab access arrangements, including details of their asymptomatic testing arrangements and the need to adhere to them. Furthermore, employers should assure themselves that other operators are limiting in-cab interactions and transmission risk in the workplace by requesting visibility of the other operator's employee's activities on the day(s) access is required.

Monitoring and review

Employers should have a process in place that ensures they are notified of all test results; this may require the employee to provide a copy of the results if they have been notified directly.

Employers should maintain a record of all employees involved in in-cab training, development and assessment activities involving other than just the booked driver. The purpose of this record is to support subsequent enquiries relating to track and trace.

Employers should make provision for the testing regime to be reviewed at the end of a 4-week bedding in period, or before should the need arise, to ensure the arrangements are effective. The review should also consider feedback from employees and test results, as there may be a case to review the type of testing in use, the kits provided and associated support, briefings and complimentary materials. The output from the review should be presented to trade unions and local health and safety representatives of employees directly affected by this guidance, with a view to consulting on any proposed changes and ongoing monitoring activities (including the use of antigen LFT tests within the 90 day period of illness onset to monitor those returning to work following their recovery from COVID-19).

Examples

- a. Trainers, assessors, instructors undertaking in-cab activities where social distancing guidelines cannot always be maintained will need to be tested initially using a self-administered RT-PCR test and the result confirmed as negative prior to being allowed to participate, tested on the day the activities are scheduled to commence using a self-administered antigen LFT test, which will be repeated every 7 days thereafter for the duration of the planned activities, except during periods of annual leave.
- b. A licensed driver being assessed during a shift, normally during a single train journey, will be safeguarded through those controls that have been put in place to mitigate transmission risk in the workplace, including good hand and respiratory hygiene, social distancing measures and good fresh air ventilation. However, as an additional complementary measure the driver will need to be tested on the day of their assessment using a self-administered antigen LFT test and the result confirmed as negative prior to the activity commencing.

- c. A new driver undertaking practical handling with an instructor for several weeks will need to be tested initially using a self-administered RT-PCR test and the result confirmed as negative prior to being allowed to participate, tested on the day the activities are scheduled to commence using a self-administered antigen LFT test, which will be repeated every 7 days thereafter for the duration of the planned activities, except during periods of annual leave.
- d. A licensed driver undertaking a traction conversion training course where they are required to accrue 8 hours of practical handling experience over 2 days, will need to be tested initially using a self-administered RT-PCR test and the result confirmed as negative prior to being allowed to participate and tested on the day the activities are scheduled to commence using a self-administered antigen LFT test. However, because the training will last for less than 7 consecutive days the licensed driver will not be required to be re-tested. The instructor will not require an additional test before going onto train others, as it is assumed because of the nature of their role they will already be in a cycle of re-testing every 7 days using antigen LFT tests.
- e. A licensed driver receiving in-cab development support from an instructor following a return to driving duties for any reason, which is of short duration (for example, a single shift or part thereof), will be safeguarded through those controls that have been put in place to mitigate transmission risk in the workplace, including good hand and respiratory hygiene, social distancing measures and good fresh air ventilation. However, as an additional complementary measure the driver will need to be tested on the day of their assessment using a self-administered antigen LFT test and the result confirmed as negative prior to the activity commencing. If the support required is likely to span several shifts/days then the licensed driver should be tested at the outset using a self-administered RT-PCR test and the result confirmed as negative prior to being allowed to participate, tested on the day the activities are scheduled to commence using a self-administered antigen LFT test, which will be repeated every 7 days thereafter for the duration of the planned activities, except during periods of annual leave.
- f. All employees involved in a driver training course (cohort) that include activities where social distancing guidelines cannot be maintained (for example, familiarisation, coupling and uncoupling or shunt moves), will need to be tested initially using a self-administered RT-PCR test and the result confirmed as negative prior to being allowed to participate, tested on the day the activities are scheduled to commence using a self-administered antigen LFT test, which will be repeated every 7 days thereafter for the duration of the planned activities, except during periods of annual leave. However, employers may choose to review the delivery of such activities to determine if the learning objectives can be achieved in a manner that allows social distancing guidelines to be adhered to. Alternatively, employers may choose to reschedule such activities to later in the curriculum, so they can be delivered just prior to or in combination with related practical handling activities.
- g. A driver participating in a route learning programme that spans several consecutive shifts/days will need to be tested initially using a self-administered RT-PCR test and the result confirmed as negative prior to being allowed to participate and tested on the day the activities are scheduled to commence using a self-administered antigen LFT test, which will be repeated every 7 days

thereafter for the duration of the planned activities, except during periods of annual leave. Drivers being accompanied by a route learner during a short duration in-cab activity do not need to be enrolled in an on-going asymptomatic testing programme. However, they should be tested for COVID-19 on the day of the planned activity and the test confirmed to be negative before being allowed to participate. The test should be a self-administered antigen LFT test and the result valid for 7 days, meaning no further testing is required should they be accompanied on subsequent days.

- h. A driver participating in a route learning activity that only spans one day/shift (including route refreshers) will need to be tested using a self-administered antigen LFT test, as this provides the drivers they will accompany with additional assurance that they are being safeguarded from the transmission risk when coupled with the controls that have been put in place to mitigate transmission risk in the workplace, including good hand and respiratory hygiene, social distancing measures and good fresh air ventilation. Drivers being accompanied by a route learner during a short duration in-cab activity do not need to be enrolled in an on-going asymptomatic testing programme. However, they should be tested for COVID-19 on the day of the planned activity and the test confirmed to be negative before being allowed to participate. The test should be a self-administered antigen LFT test and the result valid for 7 days, meaning no further testing is required should they be accompanied on subsequent days.
- i. An employee previously participating in an asymptomatic programme returning from leave where more than 7 days has elapsed since their last test result, will need to be tested using a self-administered RT-PCR test. However, their participation in a planned activity should not be delayed whilst awaiting the RT-PCR result providing they test negative using a self-administered antigen LFT test. Ideally the antigen LFT test should be administered simultaneously.
- j. An employee returning from a period of sickness that is attributed to COVID-19, will be monitored in line with Government guidance and not be subjected to an RT-PCR test in the 90-day period since illness onset. However, such employees will need to be tested using a self-administered antigen LFT test and the result confirmed as negative prior to being allowed to participate in any in-cab activity where social distancing guidelines cannot always be maintained. The results of associated antigen LFT tests will need to be carefully monitored, as their use in such circumstances is not clinically proven, but it is believed they are unlikely to return false positives. Although it must be noted, there have been no recorded cases of people becoming reinfected within the 90-day period since illness onset globally.

Note: If an employee is already participating in the asymptomatic testing programme and has been tested within the last 7 days, then there is no requirement to undertake an RT-PCR test. However, if there has been a gap of more than 7 days since the last test, then an RT-PCR test should be taken and the employee allowed to participate in any related activity whilst they await the result; providing they test negative using a self-administered antigen LFT test on the day the activities are scheduled to commence.

3.3 Responding to positive results

Employers should develop and implement a process that responds decisively and supportively when becoming aware of suspected or confirmed cases of COVID 19 in order to reduce the spread of infection within the workplace, including the following:

- Reinforce the need for the employee to follow the advice given by their doctor or NHS, which is likely to include the need to self-isolate as defined by Government guidelines.
- Any employee advised to self-isolate should request an '[isolation note](#)' and arrange to be tested for COVID-19 using the [NHS request service](#).
- Employers upon being notified of a request to self-isolate or a positive test should notify all others likely to have been in 'close contact'⁷ with the employee concerned and provide them with support and guidance through Occupational Health. At this point there is no need for others to self-isolate, unless those concerned have been contacted by the NHS Test and Trace service.
- Employees testing positive will be contacted by the NHS Test and Trace service. In preparation employees should make a note of where they had been and who they had been in 'close contact' with in the 48 hrs prior to their symptoms emerging, this will help them to answer the questions they will be asked by the NHS Test and Trace service.
- The NHS Test and Trace service will contact colleagues that have been in 'close contact' with someone who has tested positive for COVID-19 and advised to self-isolate as defined by Government guidelines. Employees receiving such advice should tell their employer and be encouraged to follow the NHS Test and Trace [advice](#).
- If an employee's test result is negative, then the employee should follow the advice provided and tell their employer.

3.4 Temperature testing

The medical and healthcare products regulatory agency (MHRA) issued a press release on the 3 July 2020 'warning that thermal cameras and other such "temperature screening" products, some of which make direct claims to screen for COVID-19, are not a reliable way to detect if people have the virus'. Therefore, employers and employees need to understand that temperature testing has limitations. However, a high temperature of 38C or above usually indicates your body is fighting infection and generally making you feel unwell, thus warranting further investigation via a medical practitioner.

⁷ Examples of '**close contact**' include: close face to face contact (under 1 metre) for any length of time – including talking to them or coughing on them, being within 1 to 2 metres of each other for more than 15 minutes – including during training and assessment activities where social distancing guidelines cannot be maintained.

What should employers do?

Employers should make provision for mandatory temperature testing to be undertaken before booking-on duty by those participating in training and competency development activities where it is not possible for social distancing guidelines to be maintained.

Employers in consultation with employees should determine how, when and where mandatory temperature testing will be undertaken. The equipment may vary from employer-to-employer, but in all cases, it is important for employers and employees to recognise the limitations associated with such provision and in doing so provide employees with guidance on how the results should be interpreted and subsequently acted upon.

Employers should consider their legal obligations under the General Data Protection Regulations (GDPR) and an employee's right to confidentiality.

Example

Employer issues instructor with an infrared thermometer. The instructor uses equipment to monitor their own temperature as part of routine preparation for duty check, but also uses it to check the temperature of trainees before commencing training activities. The instructor will respond to a high temperature reading as defined in the guidance provided by their employer, which may include:

- Initial isolation of the trainee from others for a period of time to allow the temperature to reduce, for example, 10 minutes before re-checking temperature.
- If a high temperature persists then the trainee is likely to be advised to go home and use the [NHS 111 Online symptoms checker](#).

3.5 Self-declaration

Employees should be required to undertake a preparation for duty check prior to reporting for duty, which should include a simple self-declaration that is based upon the NHS 111 Online questions:

- Do you have a high temperature?
- Do you have a new continuous cough?
- Have you had a new loss or change to your sense of smell or taste?
- Have you become breathless or are you more breathless than usual?

Employees answering yes to any of the above should complete the [NHS 111 Online symptoms checker](#) and inform their employer's nominated point of contact of the results; which are likely to require the employee and the people they live with to self-isolate as defined in Government guidelines.

However, the self-declaration check should be undertaken before leaving home, especially if an employee believes they are displaying one or more of the symptoms above, as this will help to prevent the potential spread of COVID 19.

Employees participating in training or competency activities where it is not possible to maintain social distancing guidelines should assure each other that they are fit for duty at the start of each session by

simply confirming that they have completed their preparation for duty check and that they are not displaying any COVID-19 related symptoms.

Employers should have a process in place to monitor preparation for duty checks and self-declarations.

3.6 Training and competency development (except route learning and route refreshing)

It is assumed that employers will be able to identify all training and competency development activities where it is unlikely that social distancing guidelines will be maintained by reviewing their existing training needs analysis (TNA), associated risk assessments and approaches to delivery. Therefore, employers should undertake a review of their existing arrangements to consider whether the learning outcomes can be achieved using a different approach that enables social distancing guidelines to be maintained.

It is anticipated that the above review will confirm the need for elements of training and competency development need to continue unchanged and where it is unlikely that social distancing guidelines will always be maintained. Therefore, it is recommended that employers use the additional measures discussed in this document to create '*bubbles*', which are defined as:

A 'bubble' describes the situation where nominated individuals are identified to work together with appropriate checks and safeguards in place to enable them to work more safely when social distancing guidelines cannot be maintained.

Bubbles are intended to be used for training and competency development activities where social distancing cannot always be maintained, and whilst there is no cap defined for the size of a bubble, the intent is that they will be used to facilitate activities where social distancing guidelines are likely to be breached. Therefore, an employer does not have to create a bubble for classroom-based activities when the facilities are considered to be COVID Secure and employees within the same cohort are able to maintain social distancing. However, if the training course includes elements where employees will be expected to work more closely (for example, in-cab activities), then employers should create a bubble that incorporates the following additional measures.

It is assumed the duration of activities where social distancing guidelines cannot be maintained will be derived through the TNA and associated risk assessment, which are likely to have been consulted on and agreed prior to the COVID-19 pandemic. For example, a traction conversion course includes an element of practical handling which requires each trainee to complete a minimum of 8 hours' driving spread over two days. The creation of the bubble has no impact on the duration of the activities, but does define the limits of exposure, that is 4 hours per day in this example. There is no requirement to review the original durations associated with activities, but additional time may be required to reduce the risk of transmission when trainees are changing over or when migrating from one activity to another.

What should employers do?

Employers should arrange for any employee required to participate in a training bubble to be enrolled in their asymptomatic testing programme (see section 3.2 of this document)

Employers should make provision for mandatory temperature testing for any employee within a training bubble before booking-on duty.

Employers should make provision for self-declarations for any employee within a training bubble before booking-on duty.

Employers should brief employees within a training bubble on what is expected of them when engaged in activities where social distancing guidelines cannot be maintained, for example, cab etiquette (including the importance of using all available space to avoid unnecessary physical contact) and good hand and respiratory hygiene.

Employers should constrain the number of participants engaged in activities where social distancing guidelines cannot be maintained to a ratio of 1:1. Therefore, if the training bubble consists of more than 2 employees, provision will need to be made for others to wait in a place where social distancing can be maintained. The changeover of trainees needs to be planned as sufficient time will be required to avoid unnecessary physical contact and to wipe down surfaces, equipment or controls that may have been touched by the previous trainee.

Employers should consider the logistics associated with delivery and how employees will travel between their respective booking on points and the location where training will start. Throughout the journey employees should be able to maintain social distancing guidelines and limit their exposure to the transmission risk.

Examples

Cohort of 8 trainee drivers involved in a traction training course that includes training and assessment activities where social distancing guidelines cannot be maintained. A training bubble will need to be created prior to the training and assessment activities concerned being undertaken and participation constrained to a 1:1 ratio. Other employees within the bubble will need to await their turn to participate in a place where social distancing can be maintained, for example, in the passenger accommodation of an empty passenger train. The trainer / instructor will need to plan the changeover of trainees, avoiding unnecessary physical contact between them and allowing themselves sufficient time to wipe down surfaces, equipment or controls that may have been touched by the previous trainee.

A new driver accruing practical handling experience with the same driver instructor. The two employees concerned should form a training bubble, as the activity will predominately be undertaken in a driving cab where it is likely social distancing will not always be maintained.

An assessor is required to undertake an end-point assessment, a task that will include activities where it is likely social distancing guidelines will not always be maintained. Furthermore, the duration of the assessment may span more than one day. Therefore, the assessor and trainee driver should form a training bubble.

A licensed driver is participating in a traction conversion training course with 3 colleagues that includes training and assessment activities where social distancing guidelines are likely not to always be maintained. A training bubble will need to be created prior to the training and assessment activities concerned being undertaken and participation constrained to a 1:1 ratio. Other employees within the bubble will need to await their turn to participate in a place where social distancing can be maintained, for example, in the passenger accommodation of an empty passenger train. The trainer / instructor will

need to plan the changeover of trainees, avoiding unnecessary physical contact between them and allowing themselves sufficient time to wipe down surfaces, equipment or controls that may have been touched by the previous trainee.

3.7 *Route Learning and route refreshing*

Route learning and route refreshing forms a critical component of driver training and competency development, and whilst it may be possible for related in-cab activities to be reduced to a minimum through the provision of learning materials, it is assumed that employees will continue to be required to travel in the leading driving cabs of trains. Therefore, employers should consider how the risk of transmitting COVID-19 will be mitigated.

It is recognised that employees undertaking route learning or route refreshing activities normally have a high degree of flexibility, as they often traverse routes in both directions several times throughout the day using different trains. Therefore, future arrangements need to focus on mitigating the transmission risk and providing other drivers with assurance that it is safe so far as is reasonably practicable for them to grant those undertaking route learning or route refreshing activities access to their driving cab (see section of 3.2 this document).

As a consequence, employers will be required to plan route learning in advance by creating route learning diagrams, and seek volunteers from their appropriately qualified drivers, then create designated route learner and driver bubbles. The employer will also be required to maintain records of the route learners' daily activities for track and trace purposes.

What should employers do?

Employers should arrange for all employees participating in in-cab route learning or route refreshing to be tested (see section 3.2 of this document).

Employers should make provision for mandatory temperature testing for any employee required to undertake in-cab route learning or route refreshing before booking-on duty.

Employers should make provision for self-declarations for any employee required to undertake in-cab route learning or route refreshing before booking-on duty.

Employers should brief employees undertaking in-cab route learning or route refreshing on what is expected of them with regards to cab etiquette (including the importance of using all available space to avoid unnecessary physical contact) and good hand and respiratory hygiene.

3.8 *Trainers and Assessors*

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 section provides 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 (RICE) '*Principles for managing the risk of exposure to COVID 19 to passengers and employees across the GB mainline rail industry*' and the rest of this document.

What should employers do?

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. The following should be considered:

- 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.
- 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).
- 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.
- Evaluate the barriers to maintaining the social distancing guidelines, taking into consideration traction specific characteristics and the task / activity to be trained or assessed.
- 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.
- 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.
- 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.
- 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.
- Consult on the proposed measures with those whose roles and responsibilities include on-board training and / or competency assessments and their trade union representatives.

- 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.

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 at a higher risk if they contract COVID-19. Such arrangements should extend beyond health concerns and also consider anxiety and well-being. Employers should consider the following:

- 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.
- 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:
 - Discuss the nature of the concerns and determine if it relates to an underlying health condition they or someone they live with have.
 - 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.
 - 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.
- 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 of 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.

Employers should arrange for any employee whose normal duties require them to undertake in-cab training and / or assessments to be tested (see section 3.2 of this document).

Employers should make provision for mandatory temperature testing for any employee required to undertake in-cab training and / or assessments before booking-on duty.

Employers should make provision for self-declarations for any employee required to undertake in-cab training and / or assessments before booking-on duty.

Employers should make provision for employees required to undertake in-cab training and / or assessment activities to be issued with face visors, as this precautionary measure is intended to reduce

the risk of transmission. However, employees undertaking training and / or assessment activities should not wear their visor if authorised to drive or take an active role in the safe movement of the train concerned, as the impact on visual acuity is unlikely to have been evaluated and therefore could introduce wider system risks. If trainers or assessors are to spend several consecutive days together then it may be feasible for the use of visors to be avoided providing those concerned are enrolled in an asymptomatic testing programme (see section 3.2 of this document).

Employers should brief employees undertaking in-cab training and / or assessments on what is expected of them with regards to cab etiquette (including the importance of using all available space to avoid unnecessary physical contact) and good hand and respiratory hygiene.

Employers should review their existing training and assessment arrangements to ensure they include a mechanism to clearly indicate to others, particularly drivers that an employee is authorised to access their driving cab for the purposes of training and / or assessment. This may include making an adaption to existing cab passes.

Employers should develop a communications campaign to ensure all drivers are aware of the revised arrangements, this will assure drivers when faced with a request to grant access to their driving cab that their health and wellbeing has been adequately considered and what to expect.

3.9 Monitor and review

Employers should monitor the integration of the arrangements into their business and make provision for their effectiveness to be reviewed after a 4-week bedding in period. This review should consider feedback from employees who have participated, to elicit feedback on their personal experience and observations in relation to the weekly assurance testing, specifically on: frequency, administration, overall experience and level of comfort provided by the test and associated results.

Employers should develop and implement a system that monitors the effectiveness of their arrangements, including:

- participation rates and details of concerns that emerge
- testing, administration, tracking of results, response to results and any related feedback
- preparation for duty checks and self-declarations
- instances of self-isolation as a consequence of suspected or confirmed cases of COVID-19

Employers should reflect on lessons learnt and feedback received and if appropriate revise their arrangements to address any emerging issues or concerns. Proposed amendments to the arrangements should be consulted on with their employees and trades union representative.

Employers should monitor related Government guidance and ensure working arrangements and advice to employees is amended and subsequently communicated to participants.

Employers should monitor the rate of infection nationally, regionally and within the context of their business and be prepared to pause any planned training and competency development activity whereby

social distancing measures cannot be maintained should the Government Alert Level change or guidance on social distancing measures become more restrictive.

In response to a formal notification of a local lockdown being enforced employers should immediately review existing arrangements and where necessary make reasonable adjustments, which may include the need to pause, relocate or amend training and competency development activities at a specific location or for those employees within the affected geographical area.

Employers should regularly review their arrangements until such time as the need to maintain social distancing and/or with mitigations are no longer specified within Government guidance. However, at this point employers should consult with employees and their trades union representatives on how they plan to transition back to pre-COVID arrangements and withdraw the additional measures put in place to mitigate the transmission risk.