

Position Paper

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Safety Alert IT tool

Background

The new "Safety Alert IT tool" system (hereinafter SAIT) was presented by the European Union Agency for Railways at the Innotrans fair in September 2016. The discussions that took place in the various workshops including the stakeholders led to the overall set-up of this acknowledged IT tool. Nevertheless, the practical and efficient use of this tool needs to be based on clear rules and robust processes in order to support railway safety in Europe.

CER underlines that some key issues remain to be necessarily solved before such system can be broadly and effectively used and stakeholders gain confidence in its application.

Creating a safety alert

Safety alert should be created in similar case than JNS urgent procedure: when a new incident, accident or risk may involve several stakeholders. Creating an alert should not be a way to transfer safety responsibility when a railway subsystem is not in its nominal condition (e.g. bad maintenance of a component).

CER proposals:

- Clarify, in the guidance and through example, the purpose and the case when SAIT should be used and the expected actions;
- Clarify that the breakdown defined in annex 1 of the SAIT functional requirement document should be used to define the root cause of the alert and not to share information on single defects.

Administration, access

Privacy, confidentiality and data protection are important aspects that needs to be clarified for such a tool. In particular when it comes to safety related incidents, the submitted data must be protected and any misuse of information avoided.

Access to the different pieces of information in the tool should follow strict rules in order to avoid defamatory statements and/or misuse by third parties.

CER proposals:

- Only authorized persons designated by their organization should be granted access;
- The Agency supported by NSAs should grant the access or delegate this task to a trustable body.
- An anonymization principle and confidentiality charter shall be developed.

Data quality

Inaccurate, incomplete or wrong information can lead to negative impact on business and should therefore be prevented by an adequate management of privacy, confidentiality and information quality.

The data quality is a prerequisite to have adequate action and fulfill the objectives of the SAIT. For each "alert", data completeness and accuracy shall be ensured. Outdated information shall be deleted as well as information which are not valid any longer. Duplicated alerts on the same topic should be avoided, in particular if they include diverging content. A regular cleaning up of the data and the maintenance of the tool is required.

The process to qualify data shall be led or supervised by the Safety Authorities. Only authorities have the power to mandate information and ensure that each concerned actor receives the relevant information.

CER proposals:

- The role Agency's role in "overseeing" the SAIT should include the verification of data completeness;
- NSAs should have a role to qualify the information and ensure that a false report will not lead to any severe negative impact on any stakeholder.

Language

The language issue remains a crucial open point that needs to be solved. CER understood that the majority of information in SAIT shall be entered into the tool by using "multiple-choice" or "drop-down" functions. As soon as it comes to using "free text" for describing more complex or interfacial issues the international exchange of such information is difficult due to the actors in the European railway system using 24 official languages. The mutual understanding of such free text in different languages and even writing systems (Latin, Cyrillic and Greek) by the stakeholders shall not be assumed.

Safety reporting processes

It is important to qualify the legally binding nature of SAIT messages for the sector. Responsibility for the reporting actors should be commonly understood.

The SAIT is a new tool which builds on existing obligations in European legislation, including ECM regulation and CSMS. It is supposed to be well interfaced with the stakeholder's safety management system. In this context and in order to assess the relevance of safety management by stakeholders, supervision scheme will have to address the SAIT: NSAs shall know how SAIT can be used and if its content has been effectively supporting safe operations.

In many Member States, NSAs have organized active exchanges on findings that affect national safety, thus any safety relevant risk or incident shall be communicated to the NSA

(and NSAs shall exchange and coordinate among each other, as it is described by the Rail Safety Directive). With the new alert system there is an additional and optional proposed work stream.

CER understands that the SAIT will now represent a second process that allows, together with the JNS urgent procedure, to address urgent safety cases. For SAIT, the Agency proposes to limit the communication to stakeholders. For JNS, the NSAs are fully included in the process.

SAIT, in the way it is currently set-up and its use is foreseen, does not support a consistent and efficient approach to coordinated, harmonized and mandatory safety measures and risk mitigation. Moreover, by creating a new administrative burden due to parallel reporting streams, data quality might be endangered and there is a risk to impede a concrete centralized management of the safety information.

The incompleteness of actors involved and data collected will impede a global vision on safety findings. It will weaken the supervision performed by the NSAs and not allow proper return of experience on authorization and certification.

CER proposals:

- SAIT shall become the compulsory tool supporting national safety reporting processes.
- SAIT shall be well interfaced with JNS and the safety alert system managed by NSAs

Conclusion

Data sharing should indeed support continuous improvement of safe operation, safety policy and best practice. However, this cannot involve stakeholders on a voluntary basis. A concerted approach is compulsory.

At the workshops on safety incident reporting, experience from other sectors were presented. In the inspiring aviation sector stakeholders seem not to be left alone to manage the safety of transport. In the process of promoting their "safety culture", those stakeholders are actively supported by the Member States and the European Aviation Safety Agency (EASA). Both parties are involved in the analysis and in taking decisions on control measures in order to reach an acceptable residual risk level.

CER will support the SAIT tool under the condition that it can effectively add value for safety reporting :

- SAIT including qualitative information,
- supporting reporting to the NSAs,
- enabling to start JNS urgent procedure.

The aforesaid conditions of use, typical case when to create alert, the access rights and the appropriate information sharing need to be properly managed and controlled.

About CER

The Community of European Railway and Infrastructure Companies (CER) brings together more than 70 railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies. The membership is made up of long-established bodies, new entrants and both private and public enterprises, representing 73% of the rail network length, 80% of the rail freight business and about 96% of rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policy makers and transport stakeholders, advocating rail as the backbone of a competitive and sustainable transport system in Europe. For more information, visit www.cer.be or follow us via Twitter at @CER_railways.

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