

L Williams
Director of Rail Safety
HMRI
Rose Court
Southwark Bridge Road
London
SE1 9HS

Dear Ms Williams

LONDON UNDERGROUND LIMITED

As you will be aware members of the RMT are currently in dispute with London Underground Limited (LUL) with regard to the imposition of working rosters that we believe will reduce the number of station staff on duty at any one time, in many cases by more than half. It is also our belief that this will leave many stations with insufficient cover to operate safely, especially in emergency situations.

We have already had one period of 24 hour stoppage on 31 December 2005/1 January 2006 and have plans for a second stoppage commencing at 18.30 on Sunday 8 January 2006.

I have been advised by our representatives that, during the first stoppage, LUL management allowed the following incidents to occur which I believe pose a serious risk on the underground network:

- On the Piccadilly Line the following stations – Park Royal, Osterley and Sudbury Town were not staffed and left open to passenger use. These three stations are currently subject to a prohibition notice issued by HMRI regarding platform interface equipment checks. If these stations are not staffed LUL are not complying with the terms of the prohibition notice.
- LUL have an internal procedure, Sd100, that governs action managers must take if three or more consecutive sub-surface stations are closed. The procedure states that if the stations are closed trains must be regulated through the effected stations or if this is not possible run through with no passengers. This procedure was breached at least twice. The first occasion occurred on the Piccadilly Line on Saturday 31 December 2005 when Holloway Road, Caledonian Road, Kings Cross and Russell Square stations were closed. The second occasion was on Sunday 1 January 2006 when Goodge Street, Tottenham Court Road and Leicester Square stations were all closed.
- Rayners Lane station has a congestion control plan with a minimum staffing level. This staffing level was breached on at least three occasions during the period of the stoppage.
- Hillingdon Station was unstaffed but left open. This station has a fire control panel (section 9) which must be staffed at all times. The station also has a system where the station lights are switched out 20 minutes after the last scheduled train. This station was therefore in darkness between the hours of 02.00 and 05.00 when passengers were still using the station.

These five examples of practices encouraged by LUL during the dispute are merely the tip of the iceberg of what occurred during the period of the dispute. I am being informed of other breaches of safety almost continuously. I am also concerned that management and other grades are being 'trained' by management to cover platform

staff duties during strike days and that this training is woefully inadequate. The training does not cover any element of local familiarisation which is essential if staff are placed in a position of carrying out new duties in an unfamiliar environment.

I must also raise LUL's application of their Refusal to Work on Grounds of Safety policy. Staff who are using this policy to raise genuine health and safety concerns with their line managers are being sent home with no attempt to discuss workers concerns and to rectify perceived safety deficiencies.

As I have already stated I believe that these practices pose a serious risk to both passenger and staff safety on the LUL network and would ask that you conduct an urgent investigation into these allegations so that LUL will not be allowed to run the network with such blatant disregard for the safety of the traveling public and workers not directly involved in the dispute.

It would also be useful to have emergency contact numbers of your local inspectors so my representatives can report directly to your staff any urgent safety breaches during the coming dispute.

If you require any further information please contact my Regional Organiser, Mr Bobby Law. He can be contacted on 020 7529 8862 or 07930 527686.

Yours sincerely

B Crow
General secretary