

Brussels, 13 June 2017

Joint Statement on the European Union Agency for Railways Safety Alerts IT tool (SAIT)

The Safety Alerts IT tool (SAIT) was presented by the European Union Agency for Railways at the InnoTrans fair in September 2016. CER, EIM and UNIFE appreciates the work carried out so far by the Agency in trying to establish a harmonized EU tool and providing the first version of the SAIT. However, since launch there has been limited use of the tool. This is largely due to uncertainty of how to use the tool and its legal implications in the sector.

CER, EIM and UNIFE believe that for the tool to be broadly and appropriately used by the European railway actors as intended, further consultation and development of the SAIT is needed, to ensure it supports the sector, is fit for purpose and the European railway actors can commit to and trust its use. CER, EIM and UNIFE therefore ask that the SAIT have a similar level of consultation as seen for the other Common Occurrence Reporting (COR) Safety Management Data (SMD) work stream, since identical clarification and consensus is needed for the same topics: taxonomy, phasing, legislation, link to national systems, governance, use of data, roles etc.

Currently there are 8 alerts input into the SAIT. While several of these are 'test' alerts, they already demonstrate a varied approach of what to publish and when, confirming the need to clarify the concerns expressed below.

CER, EIM and UNIFE have identified the following key issues with the current use of SAIT, which need to be resolved before the tool can be broadly and effectively used and stakeholders gain confidence in its application:

- How to use – within the railway sector there is still some confusion between and with the two COR systems.
 - What to report – clear criteria, guidance and examples of what to be reported in the SAIT
 - When to report – depending on the criteria and guidance the number of reports expected and therefore resources required is still unclear, this should be clarified.
 - Who to report – roles of actors in the SAIT need to be clarified
- Functionality – the functions available in the tool need to be better described and fit for purpose, some further functionality may be required or removed. For example:
 - Alert status – there is currently no indication whether an alert is open or closed. Outdated alerts can remain open without update of information and actions taken
 - Search/Notification – the system for searching for involved actors or receiving notifications when involved in an alert needs to be discussed, to ensure that the relevant alerts are seen by the right people without an administrative burden

- The “Crowd sourced risk assessment” – the current voting tools for criticality and frequency shall be removed. This function is more dangerous than helpful as risk perception varies depending on actors involved. In addition, all users do not have the detailed knowledge of the incident appropriate for the vote
- Access to the tool - the administrative process to verify users should be made transparent and users should be able to see who else has access, in order to promote trust and mutual exchange
- Confidentiality - safeguards against abuse of data needs to be discussed considering how open the data is and what it can show. This affects the possible legal implications of the SAIT which are still unclear
- Data Quality – data validation and control needs to be further considered, the tool may need an overseeing actor to support this or registered users who can input alerts, to avoid possible legal implications
- Data volume – It is a concern that the amount of data may become unwieldy to such an extent that important information gets lost in the noise of lower level alerts as users do not have sufficient resources to manage this. It is for this reason that the ‘what’ to report is crucial to this tool being of real use to the sector.
- Language – how to approach language issues in the SAIT should be further discussed and clarified

It has to be noted that simply mandating the use of SAIT on our sector will not solve any of the issues identified in this statement - which can only be addressed by the Agency undertaking effective collaboration with the sector. CER, EIM and UNIFE welcome the European Union Agency for Railways’ feedback on these points and welcome the opportunity for further consultation on the SAIT to ensure its development to support the railway safety in Europe.