**Date issued:** 5 April 2022

**Freedom of Information Request**

We are writing in response to your Freedom of Information request. Your request has been considered in accordance with the requirements of the Freedom of Information Act and our Data and Information Management Policy.

**Your Questions Answered**

1. **On how many occasions has one of your trains in passenger service been worked by a person who is acting as a Guard who is not employed as a Guard instead of being worked by a standard fully trained Guard who is employed as a Guard as normal?**

The only instances of a conductor/guard role being covered by another person would be as a result of a Conductor Manager covering a service. We do not hold details of individual circumstances of when this has happened.

1. **How many of your employees in total have acted as a Guard?**

We do not hold details of individual circumstances when this happens but is generally as a last resort where a service needs to be covered in the event of an incident (for example).

1. **Please provide a full list of all of the job titles of these employees who have acted as a Guard?**

Conductor Manager.

**Answered together:**

1. **How many hours of training did these people receive before being allowed to act as a Guard?**
2. **How many hours of this training was out on the trains and how many hours was in a classroom?**

Conductor Managers hold competency as a conductor and have all previously been a conductor prior to their move into the Conductor Manager role and would have undertaken full conductor training and hold full conductor competency with many progressing through the roles of Minder and Conductor Instructor prior. As part of their role, Conductor Managers retain full conductor competency and are assessed through a process to retain these competencies.

Regarding training, for Cardiff Mainline services there is a minimum of 805 hours training, with additional Part B training if required. This is based on a seven hour working day from the 11x weeks of Part A (initial/basic) Training, 10x weeks of Route Learning and 2x weeks Mentoring (Part B).

Cardiff Valleys services require a minimum 525 hours training but this is rudimentary as hours during Part B training can be more. This is based on a seven hour working day from the 11x weeks of Part A (initial/basic) Training, 2x weeks of Route Learning and 2x weeks Mentoring (Part B).

Classroom based training hours during initial training is 280 hours.

1. **How many safety related incidents that were the fault of the acting Guard occurred on these services being worked by a person acting as a Guard and please provide the full details of all such incidents?**

There have been no recorded incidents whilst a Conductor Manager has been working a train in service within TfW.

1. **Please provide any training documents or any such related documents that you hold that have been used to provide training and information to these employees acting as a Guard?**

With regards the training documents, we can confirm that we hold the information you require. However, the Transport for Wales (TfW Rail) Driver training documents and Guard training documents for our new passenger trains are exempt from disclosure under sections 24 (National Security) and 38 (Health and Safety) of the Freedom of Information Act.

The material requested would be of use to any persons wishing to disrupt TfW Rail and Wales & Borders transport infrastructure by placing into the public domain information which would otherwise not be available via other means. Whilst we make no suggestion that you would use this information for anything other than you own interest, disclosure of information under FOI has to be regarded as a disclosure to the public at large. As you will no doubt be aware, the rail transport system in the UK has been the target of attacks in the past. The information requested contains sensitive information about the operation of the network which could be of use for anyone seeking to research or plan for such an attack or to actively cause disruption to the network.

Further, there is no meaningful way in which the material can be redacted. While some sentences or passages may appear innocuous in isolation, taken together across the suite of documents it would still allow somebody to build up a detailed picture of TfW Rail operational processes and the language used in the operation of the network.

The use of the section 24 and 38 exemptions are subject to an assessment of the public interest in relation to the disclosure of the information concerned. We recognise the need for openness and transparency by public authorities and acknowledge that there may be some interest in the information in question - as evidenced by the fact that you have requested it. However, as we believe this information could potentially be obtained and utilised by individuals who may wish to use it to cause disruption or harm to TFW Rail transport infrastructure, in this instance we believe that minimising the risk to that infrastructure and protecting the safety and welfare of members of the general public and our staff outweighs the limited public interest in disclosure.

1. **Please provide a full list of all such occasions where one of your trains has been worked by such a person acting as a Guard instead of a fully trained Guard working it. The list must include the date and the headcode(s) of the service(s) that they worked and the reason for using them instead of a fully trained Guard and the job title of the person who was acting as a Guard on that train. I would like this information for the period of the last ten years. However if that is not possible and exceeds the limits then just provide me with the information for as far back as you can go. At the very least i would hope that you could provide information for the period of between now and when you were nationalised (07/02/2021) please?**

We do not hold details of individual circumstances when this happens but is generally as a last resort where a service needs to be covered in the event of an incident (for example).

We hope this information is of use to you.

Yours sincerely,

**Transport for Wales**

**Appeal Rights**

If you are unhappy with the way your request has been handled and wish to make a complaint or request a review of our decision, please write to the Head of Freedom of Information at either Transport for Wales, 3 Llys Cdwyn, Pontypridd, CF37 4TH or [freedomofinformation@tfw.wales](mailto:freedomofinformation@tfw.wales). Your request must be submitted within 40 working days of receipt of this letter. If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision.

The Information Commissioner (ICO) can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or you can contact the ICO through the 'Make a Complaint' section of their website on this link: <https://ico.org.uk/make-a-complaint/>

The relevant section to select will be "Official or Public Information".