

Coroner's Officer
South London Coroner's Office
Floor 2 Davis House
Robert Street
Croydon
CR0 1QQ

██████████
Your Ref ██████████
██████████
██████████
Web www.lrssb.org
Date 19th November 2021

Dear Mary,

RE: LRSSB Response to HM Coroner's Regulation 28 Report to Prevent Future Deaths sent to LRSSB on 21st September 2021 – Anonymous Reporting

1. The Role of LRSSB

- 1.1 The Sandilands accident occurred in November 2016 with the Rail Accident Investigation Branch (RAIB) report being published in December 2017 (Sandilands Report). Recommendation Number 1 of that report was for the ORR to work with the UK tram industry to develop a body to enable more effective UK-wide cooperation on matters related to safety, and the development of common standards and good practice guidance. The UK light rail industry responded quickly to Recommendation Number 1, forming a working group of senior industry representatives to consider the most appropriate organisation, and underlying structure, including how the new body should be funded.
- 1.2 The Light Rail Safety and Standards Board (LRSSB) was incorporated on 14th August 2018 and initially operated in shadow form. In May 2019 LRSSB received its initial funding from the Department for Transport. In conjunction with receiving this funding the Terms of Reference and the LRSSB Business Plan were able to be ratified by the Board of Directors later in May 2019.
- 1.3 It should be noted that the LRSSB is the safety and standards body for light rail and tramways in the UK and is completely separate (both in ownership and funding sources) from the Rail Safety and Standards Board (RSSB). The RSSB was itself established in 2003 following the recommendations of the Cullen Report into the Ladbroke Grove incident which included the establishment of an independent safety and standards body for the heavy rail sector.
- 1.4 While LRSSB received an initial 3-year funding settlement from the Department for Transport it has no guarantee of future funding at the end of this initial funding period which expires August 2022. The level of staff employed by LRSSB and consequently

the amount of work that it can undertake has a direct relationship with the funding settlement that it receives from the Department for Transport.

- 1.5 LRSSB is recognised and accepted by the light rail community, the Department for Transport and the Office of Rail and Road in the UK as the industry body responsible for providing standards and guidance relating to safety and the design, construction, maintenance, and operation of light rail systems in the UK. LRSSB has established and is continuing to develop a reference library where such industry standards and guidance can be found.
 - 1.6 It should be noted, however, that LRSSB is an organisation that requires voluntary adherence to its guidance and best practice. Unlike the heavy rail industry, light rail operators are not required to be licensed under the Railways Act 1993 and there are therefore no licence conditions requiring membership of LRSSB or compliance with its outputs, however, currently, all seven 2nd generation UK tram networks are members of LRSSB and are actively engaged. While some parts of the Railways Act 1993 do apply to light rail and tramways, significant parts of that Act do not. This reflects the historic policy position that Government has taken under which light rail and tramway systems have generally been more associated with highways provisions rather than the more heavily regulated mainline railways.
- 2. LRSSB's current ongoing work with respect to Anonymous Reporting (CIRAS).**
- 2.1 The development of standards and guidance takes a significant number of months. A working group is established within which skilled safety professionals discuss the requirements for the document and the specific matters that it needs to cover before the text of the initial draft is developed. That draft document must be reviewed and tested to ensure that it is fit for purpose before it can be signed off for its release or use by the UK light rail sector. It should also be noted that LRSSB works closely with the ORR in its development of industry standards and guidance.
 - 2.2 In the Preventing Future Matters report published by HM Senior Coroner, South London, LRSSB was asked to respond on the topic of Anonymous Reporting. The report details how all tramway operators should look at using CIRAS (or a similar anonymous reporting scheme) and whether such schemes are used and if not, why not.
 - 2.3 LRSSB believes that all seven UK Tramways subscribe to a confidential reporting scheme. It is understood that the scheme they are all members of, is CIRAS. LRSSB has also had this confirmed by the CIRAS body.
 - 2.4 LRSSB is a member of the CIRAS committee representing the light rail sector, that is Chaired by the independent Chair of the CIRAS Board. The committee is made up from representatives of member companies and unions in addition to independent experts. The committee assists the organisation in ensuring its ongoing effectiveness and helps it adapt to the needs of its members and staff. LRSSB communicates information, reports and analytics raised at the CIRAS Committee to the sector via the Light Rail Heads of Safety Group.

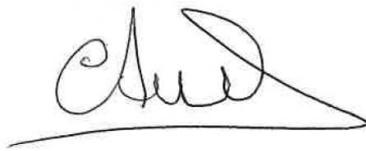
- 2.5 LRSSB will continue to monitor advancements in this area and will update its documentation accordingly.

3. LRSSB's Conclusions

- 3.1 Whilst it has been identified that the sector does use CIRAS, LRSSB believes that the production of a tramway specific guidance note, allied to a positive communication campaign, aimed directly at front line staff, will highlight, and promote the benefit of such schemes.
- 3.2 In collaboration with CIRAS, LRSSB intends to provide documentation detailing such schemes and their benefits. This documentation is currently in preparatory draft form, but LRSSB expects publication to be before the end of this business year (March 2022).

Issued: - 19th November 2021

Yours sincerely,




Chief Executive