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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 – Risk of passenger ejection through tram doors.

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 14 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 Risk of passenger ejection through tram doors.

- 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 released for 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 passenger ejection through tram doors.
- 2.3 In its role LRSSB has the ability, and is frequently requested to, represent the UK light rail sector on various European Standards technical working groups and committees. The committees can be made up of representation from across Europe and include, owners, statutory bodies, designers, manufactures and operators. If a proposal has been voted for and accepted by BSi, it will then look to adopt the standard for the UK sector. RSSB act as the secretariat for BSi.
- 2.4 There are many standards applicable to the construction of a metro or tram car. LRSSB is reviewing the provenance and relevance of those pertinent to this issue. Currently one of the committees LRSSB sits on is RAE/001/0-/18 Railway applications - Interior passive safety BSi eCommittee. Amongst topics being considered are metro

and tram saloon doors and their security and crashworthiness. LRSSB has also requested that all the technical recommendations from the RAIB Sandilands investigation be considered.

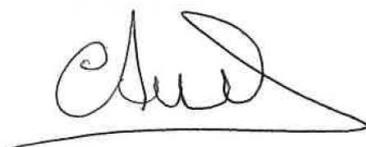
- 2.5 The UK eCommittee voted positively to have the issues raised by LRSSB included. That resolution then went to the European Committee who approved the creation of a Technical Report Committee.
- 2.6 LRSSB is also monitoring any advancements made in this area by TfL / London Trams with their manufacturer. If positive action is taken, then LRSSB will use its communication channels to ensure that the sector is fully briefed. Likewise, LRSSB regularly meets with the sector and will ensure that updates to and from the networks are assessed and communicated out accordingly.

3. LRSSB's Conclusions

- 3.1 Whilst the status of some of RAIB's recommendations remain 'implementation on-going', significant progress continues to be made within the sector. It is important to ensure clarity of progress and conclusions should not be rushed where possible to avoid producing sub-optimal conclusions in the longer term. LRSSB will look at any proposed changes to doors with a view to the holistic risk profile. For instance, the optimisation of driver inattention and speed management systems should prevent the risk of topple due to excessive speed.
- 3.2 LRSSB will continue to take an active role in the European Standards and BSi working groups as this is where design and manufacturer of future fleets can really be influenced.
- 3.3 LRSSB will consult with TfL / London Trams to ascertain what remedial action have or can be reasonably taken to address this issue. LRSSB would then publish a briefing or guidance note as to what the sector should be considering. At this time LRSSB are unsure of the timelines for this work but will report back to HM Coroner South London as soon as these have been finalised.
- 3.4 LRSSB expect that any actions being taken by individual networks will be supported by suitable and sufficient risk assessment; drawing on the outputs of the LRSSB sector risk model and guidance as necessary; and taking account of the effectiveness of other risk controls that are in place.

Issued: - 19th November 2021

Yours sincerely,




Chief Executive