

Tramlink Depot

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Croydon
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Miss Sarah Ormond-Walsh
HM Senior Coroner
South London


23rd November 2021

Dear HM Senior Coroner

Re: Regulation 28 Report(s) to prevent future deaths in connection with the Inquests touching the deaths of Dane Chinnery, Donald Collett, Robert Huxley, Philip Logan, Dorata Rynkiewicz, Philip Seary and Mark Smith (“Sandilands Inquests”)

I write in relation to the Regulation 28 reports to Prevent Future Deaths (“PFD”) prepared by you following the conclusion of the Sandilands Inquests.

You made four separate PFD reports dated 28 September 2021 concerning (i) anonymous reporting schemes (ii) passenger ejection through tram doors (iii) the lack of a centrally funded national tram safety passenger group and (iv) automatic braking systems. The PFD reports were copied to Tram Operations Limited (“TOL”) as an Interested Person (“IP”) in the Sandilands Inquests.

The PFD reports concerning anonymous reporting schemes and passenger ejection through tram doors were addressed to UK Tram to be disseminated to all tramway operators. In accordance with your request, the purpose of this letter is to summarise the action taken or proposed to be taken by TOL in connection with the two reports or to explain why no such action is proposed.

The PFD reports concerning the lack of a centrally funded national tram safety passenger group and automatic braking were not addressed to tramway operators. Therefore, I do not provide commentary on those issues in this letter.

PFD Report on Anonymous Reporting Schemes

In your PFD report on anonymous reporting schemes, you state that all tramway operators should give consideration to subscribing to Confidential Reporting for Safety (“CIRAS”) or to another similar anonymous staff member reporting scheme, and further to look at whether such schemes are used, and if not, why not.

I confirm that TOL is a member of CIRAS, an independent not-for-profit confidential reporting service to the transport sector, having joined on 1 May 2017. TOL staff may choose to make a report to CIRAS on a confidential basis.

The CIRAS reporting line and signs displaying CIRAS contact details are present in the corridors and mess rooms at our Therapia Lane Depot, which are high footfall locations. CIRAS is a useful tool where staff prefer to remain anonymous. We can use the output of CIRAS reports and CIRAS representative events in a positive way to inform improvement initiatives across the organisation.

There have been no recent CIRAS reports but given TOL's relatively small size this is not unexpected as TOL's staff have a number of means of raising concerns. In line with our efforts to achieve a just culture, we have put in place resources to encourage internal reporting. By way of a few examples, there are a number of staff suggestion boxes located at our Therapia Lane Depot where staff may drop-off written feedback. The boxes are checked weekly, emptied on a regular basis and we respond in writing to each piece of feedback and take steps where appropriate.

In addition, staff may speak to their union representatives. Time is allocated each week to ensure that union representatives can carry out their union role (which includes liaising with staff regarding any points they wish to raise). We hold regular meetings with union representatives to ensure that management hear feedback reported through the unions.

Staff may also report directly to senior management. We operate an open door policy and we actively encourage the practice of self-reporting.

PFD Report on Passenger Ejection through Tram Doors

In your opinion, consideration should be given to current and future trams as to whether tram doors can be adapted (strengthened) now or in the future.

Please note that whilst TOL is the operator of the trams, it does not own the trams or have the power to implement changes to them. The trams are owned and managed by Tramtrack Croydon Ltd ("TCL"), trading as London Trams (a wholly owned subsidiary of Transport for London). The ultimate decision on any adaption of tram doors on Croydon Tramlink sits with London Trams in conjunction with tram manufacturers. Therefore, I can provide only limited commentary on this point from TOL's perspective.

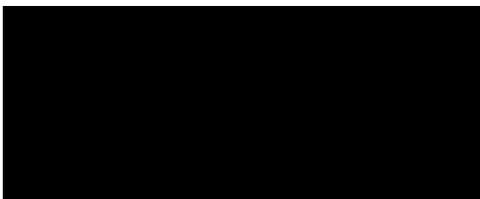
I confirm that TOL welcomes discussion with London Trams in this area, particularly in the context of the future replacement of the CR 4000 fleet. If tram manufacturers are able to strengthen the current doors in a way that is safe for the system as a whole, TOL would support their implementation across the Croydon Tramlink network.

Tram owners and tram manufacturers will be able to provide you with a much more detailed response on this point.

I would like to reiterate that health and safety is of paramount importance to TOL. We are committed to ensuring that our passengers, staff and members of the public remain safe.

I would be happy to assist you further should you require any further information.

Yours sincerely



Managing Director, Tram Operations Ltd