

**Oliver Stewart**  
**RAIB Recommendation Handling Manager**



30 May 2024

Mr Andy Lewis  
Deputy Chief Inspector of Rail Accidents

Dear Andy,

**RAIB Report: Passenger injury at Ashton-under-Lyne tram stop on 12 March 2019**

I write to provide an update<sup>1</sup> on the action taken in respect of recommendation 3 addressed to ORR in the above report, published on 28 November 2019.

The annex to this letter provides details of actions taken in response to the recommendation and the status decided by ORR. The status of recommendation 3 is **'Closed'**.

We do not propose to take any further action in respect of the recommendation, unless we become aware that any of the information provided has become inaccurate, in which case I will write to you again.

We will publish this response on the ORR website.

Yours sincerely,

Oliver Stewart

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<sup>1</sup> In accordance with Regulation 12(2)(b) of the Railways (Accident Investigation and Reporting) Regulations 2005

### Recommendation 3

*The intent of this recommendation is that tram drivers are better able to manage the safety of impaired passengers, particularly around the platform-tram interface.*

KAM should undertake a risk-based review of the actions which tram drivers should carry out if they encounter an impaired passenger. This review should consider the well-being of both the staff member and passenger. Once completed, the output of the review should inform guidance for staff. This guidance should be incorporated into the training and assessment procedures used within the driver management function within KAM.

This recommendation may apply to other light rail operators in the UK.

### ORR decision

1. Keolis Amey Metrolink (KAM) has reviewed the actions tram drivers should undertake if they encounter an impaired passenger and updated the risk assessment form. The risk assessment form now covers a number of possible scenarios where a tram driver may encounter an impaired passenger and the appropriate action to control that risk.

2. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, KAM has:

- taken the recommendation into consideration; and
- taken action to close it

**Status: Closed.**

### Previously reported to RAIB

3. On 27 November 2020 ORR reported the following:

The initial response to the recommendation from KAM did not include evidence of a suitable and sufficient risk assessment having been carried out, but did identify some control measures for tram drivers if they encounter an impaired passenger. KAM are now carrying out a risk assessment and have agreed to report its finding to ORR by 11 December 2020. We will provide RAIB with an update in due course.

### Update

4. On 23 December 2020 KAM provided the attached LRV Driver risks assessment, updated to include the risk of vulnerable persons.:



5. On 24 October 2023 ORR wrote to KAM and asked the following:

We've now had a chance to review the risk assessment provided in relation to Ashton-under-Lyne rec 3.

There were two areas we felt were not covered by the risk assessment: someone becoming vulnerable while on a tram (e.g. a medical episode) and a vulnerable person boarding and travelling on a tram (e.g. under the influence of drugs or alcohol).

The version of the Rule Book you sent us is Spring/Summer 2020. Is there a more recent version of the Rule Book that covers the output of this risk assessment?

6. KAM provided the attached updated version of the risk assessment:



RA DRV 0013  
Driving-Operating an

7. On 20 May 2024 KAM provided the following update:

*As promised during last week's liaison meeting please find attached evidence that awareness of vulnerable persons are included with training assessment and briefing documents.*

- *Rules and Regs assessment paper including question on vulnerable persons.*
- *KAM's Platform Tram Interface Awareness booklet.*
- *Briefing provided to staff regarding double-unit incidents.*



4. Rules and  
Regulations Written



KAM Platform Tram  
Interface Safety Bookl



KAM0498 - Safety  
Brief for all staff - Vuln

## Previously reported to RAIB

### Recommendation 3

*The intent of this recommendation is that tram drivers are better able to manage the safety of impaired passengers, particularly around the platform-tram interface.*

KAM should undertake a risk-based review of the actions which tram drivers should carry out if they encounter an impaired passenger. This review should consider the well-being of both the staff member and passenger. Once completed, the output of the review should inform guidance for staff. This guidance should be incorporated into the training and assessment procedures used within the driver management function within KAM.

This recommendation may apply to other light rail operators in the UK.

### ORR decision

1. The initial response to the recommendation from KAM did not include evidence of a suitable and sufficient risk assessment having been carried out, but did identify some control measures for tram drivers if they encounter an impaired passenger. KAM are now carrying out a risk assessment and have agreed to report its finding to ORR by 11 December 2020. We will provide RAIB with an update in due course.

2. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, KAM has:

- taken the recommendation into consideration; and
- is taking action to implement it by 11 December 2020

**Status: Implementation on going. ORR will advise RAIB when further information is available regarding actions being taken to address this recommendation.**

### Information in support of ORR decision

3. On 24 February 2020 Keolis Amey Metrolink provided the following initial response:

*A risk-based review has been undertaken. The outcome is guidance for staff, which is included within the new Driver Rule Book, sections 1.9; 2.2.5; 2.3; 7.3; 7.12 refer. The drivers have also received a briefing on the action to take if they should encounter a vulnerable or impaired passenger, which was included in the safety brief 0366C (03).*

4. On 17 September 2020 Keolis Amey Metrolink and Transport for Greater Manchester provided the following joint update:

*As requested, please find enclosed evidence of the risk-based review undertaken as required by recommendation 3. This review was undertaken as part of the development on the new KAM Driver Rulebook which is also enclosed.*



Copy of Rule book  
review and risk asse



KAM 001 Rule Book  
Inners-Final - MARC