



***Guidance in the Management of  
Vulnerable Persons***

  
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| THIS DOCUMENT PROVIDES GUIDANCE ON THE OPERATIONAL MANAGEMENT OF VULNERABLE PERSONS |   |                        |  |  |
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| <b>SOURCE / RELATED DOCUMENTS:</b>  |   |                        |  |  |
| LRG 1.0 Tramway Principles and Guidance (TPG) (LRSSB)<br>Also see Appendix 1        |   |                        |  |  |
| <b>RELATED TRAINING COURSES:</b>  |   |                        | <b>RELATED LEGISLATION:</b>  |  |
| See Appendix 2  |   |                        | Health & Safety at Work Act 1974<br>Railways and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS)<br>Mental Health Act 1983<br>The Care Act 2014<br>Equality Act 2010<br>The Human Rights Act (1998)<br>General Data Protection Regulation (GDPR)<br>The Information Commissioners Data Sharing Code of Practice (May 2011)<br>Freedom of Information Act 2000<br>Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 |  |
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## **LRSSB**

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## **GUIDANCE IN THE MANAGEMENT OF VULNERABLE PERSONS**

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## TERMS AND ABBREVIATIONS

**Table A – Terms**

| Term                     | Definition   |
|--------------------------|--|
| <b>Safeguarding</b>      | As a structured means of protecting vulnerable person(s).  |
| <b>Vulnerable Person</b> | A person aged 18 years or over who is, or may be, in need of community care services by reason of mental or other disability, age or illness, and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. (Department of Health) |

**Table B – Abbreviations**

| Term          | Definition  |
|---------------|---|
| <b>ATOC</b>   | Association of Train Operating Companies                              |
| <b>BTP</b>    | British Transport Police  |
| <b>DfT</b>    | Department for Transport  |
| <b>GDPR</b>   | General Data Protection Regulation                                    |
| <b>LRSSB</b>  | Light Rail Safety and Standards Board                                 |
| <b>MASH</b>   | Multi-Agency Safeguarding Hub   |
| <b>ORR</b>    | Office of Rail and Road   |
| <b>RIDDOR</b> | Reporting of Injuries, Diseases and Dangerous Occurrences Regulations |
| <b>RISSG</b>  | Rail Industry Suicide Stakeholder Group                               |
| <b>RSSB</b>   | Rail Safety and Standards Board                                       |
| <b>SPAP</b>   | Suicide Prevention Action Plan  |
| <b>SPC</b>    | Suicide Prevention Champion   |
| <b>SPDHG</b>  | Suicide Prevention Duty Holders Group                                 |
| <b>SPPC</b>   | Suicide Prevention Plan Coordinator                                   |
| <b>SPSG</b>   | Suicide Prevention Steering Group                                     |
| <b>TAIR</b>   | Tram Accident and Incident Reporting database                         |
| <b>TOC</b>    | Train Operating Company   |
| <b>UK</b>     | United Kingdom  |
| <b>VPWG</b>   | Vulnerable Persons Working Group                                      |

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## 1. Introduction

- 1.1. This guidance supports the high level principles set out in LRG 1.0 Tramway Principles and Guidance (TPG) published by the Light Rail Safety and Standards Board (LRSSB).
- 1.2. This document provides guidance to Light Rail systems in regard to managing vulnerable persons for those delegated this responsibility in relation to UK Light Rail (Tramways) systems based on 'line-of-sight' operations only. As with all guidance, this document is not prescriptive and is intended to give advice not to set a mandatory industry standard, and it is based upon goal setting principles as best practice. Much of this guidance is based on the experience and best practice gained from existing UK Tramways and from published documents.
- 1.3. This guidance is not intended to be applied retrospectively to existing tramways. However, owners and operators should consider and assess any implementation of this guidance and / or any subsequent revision, to ensure continual improvement, so far as is reasonably practicable.

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## 2. Scope

- 2.1. Each day a huge variety of people pass through the UK Light Rail network, most of whom without needing specialist help or support from Light Rail systems. However, some of these people may arrive at the tramstop in a vulnerable state, or become vulnerable whilst at the tramstop, or whilst travelling on the network.
- 2.2. An individual vulnerability may be related to a person's pre-existing mental or physical state (for example, an anxiety disorder, being elderly, sensory impairment, etc.) or a vulnerability could emerge due to an unfolding situation whilst travelling (for example, overcrowding causing mental overwhelm). Either way, once a vulnerability presents itself, it falls to the Light Rail system to respond in a sensitive, professional and proportionate way to ensure that the person(s) is made safe whilst in transit.
- 2.3. This guidance document outlines how Light Rail operators may effectively and appropriately respond to vulnerable person(s) travelling on their part of the Light Rail network. It is envisaged that by developing a common understanding around the issues and management strategies, an industry-wide approach can then be adopted. In turn this will also support other agencies, such as the British Transport Police (BTP), to support the Light Rail industry more efficiently and effectively.
- 2.4. It is designed to ensure that the needs of vulnerable person(s) are addressed at the earliest opportunity and that appropriate steps are taken to safeguard the individual(s) until they safely and securely pass through the tramstop / Light Rail system or where necessary, until further assistance can arrive from other support agencies such as the BTP.
- 2.5. This guidance is aimed at all Light Rail operators in the UK. This includes staff members working on the fleet (for example, drivers, conductors, etc.), staff members working in tramstops (for example, ticketing, platform management, etc.), and corporate and operational company management. It is suggested that operational management consider which aspects of the guidance are most relevant to their organisation and brief staff with the relevant points.
- 2.6. This guidance describes the identification and safe management of vulnerable persons on the Light Rail network, including both the vehicles operating on that network, as well as the surrounding tramstop areas. The guidance does not cover the management of vulnerable persons beyond the boundaries of the Light Rail system, for example, buildings, structures or landmarks within close proximity, or connected transportation systems. However, it does provide guidance on the sharing information about vulnerable persons with other relevant agencies.
- 2.7. The guidance is developed to support the industry's operational management of vulnerable persons, as and when they present to staff members. The guidance does not cover fleet or tramstop design, engineering or maintenance issues related to the physical accessibility of the Light Rail system.
- 2.8. The guidance has been developed for the Light Rail industry in the UK, although many of the operational management principles could be usefully applied elsewhere after taking into consideration possible cultural differences.

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2.9. This document primarily provides guidance for normal operational scenarios. However, attention is also drawn to some emergency considerations as outlined in Section 7.

Vulnerable Person Definition

2.10. The Department of Health defines a vulnerable adult as:

‘a person aged 18 years or over who is, or may be, in need of community care services by reason of mental or other disability, age or illness, and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.’<sup>1</sup>

2.11. The latter part of this definition also encompasses children (under 18's) into what could be usefully adopted as a broader definition of a 'vulnerable person'.

2.12. European Standard BS ISO 22395:2018<sup>2</sup> expands further by listing a range of human factors that may contribute to potential individual vulnerabilities:

- Physical, mental, emotional and cognitive ability;
- Illness;
- Ethnicity;
- Cultural and religious background;
- Language;
- Citizenship;
- Socioeconomic status;
- Age; and
- Gender.

2.13. It is important to note that these factors alone do not necessarily place an individual at a higher risk of being or becoming vulnerable whilst travelling on the Light Rail network, however they do provide some guidance in terms of the types of individual differences which may cause some people to be more at risk of vulnerability than others.

2.14. Aside from the definitions themselves, the most important aspect is that regardless of the nature of the vulnerability itself, a person deemed vulnerable is someone needing help to keep themselves safe from physical or mental harm.

Safeguarding

2.15. A term closely related to vulnerable persons is 'safeguarding'. A useful working definition to provide a shared understanding of the term is as follows:

*"...the action that an organisation takes to promote the welfare of children and vulnerable adults to protect them from harm including physical, emotional, sexual*

<sup>1</sup> Safeguarding adults, Patient, <https://patient.info/doctor/safeguarding-adults-pro>

<sup>2</sup> European Standard (BS ISO 22395:2018, 30 Sep 2018) - "Security and resilience. Community resilience. Guidelines for supporting vulnerable persons in an emergency" - <https://shop.bsigroup.com/products/security-and-resilience-community-resilience-guidelines-for-supporting-vulnerable-persons-in-an-emergency>

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*and financial harm and neglect. This includes making sure that the appropriate policies, practices and procedures are put in place. Safeguarding includes child protection but goes further and extends to all vulnerable beneficiaries<sup>3</sup>*

- 2.16. This definition describes the process of safeguarding as an organisational mechanism for protecting vulnerable persons using a structured process.
- 2.17. It should be noted that in some areas of safeguarding legislation there is a move away from the use of the term 'vulnerable' to describe 'adults at risk' of abuse<sup>4</sup>. This is because in the context of safeguarding the vulnerability comes from the abusive situation itself, as opposed to inherent vulnerabilities in the individual. However, for the purposes of this guidance, the term vulnerable is still deemed appropriate as it refers to the range of individual factors (listed above) which may make some individuals more vulnerable than others in a range of different transportation situations and settings.

#### Vulnerable Persons on the Light Rail Network

- 2.18. The definitions above provide useful descriptions of two closely interrelated terms: vulnerable persons and safeguarding. However, just because someone has a vulnerability (for example, a visual impairment), does not mean they will necessarily present themselves to staff as being vulnerable whilst on the Light Rail network. Conversely, someone not normally deemed vulnerable may become so whilst traveling (for example, feeling overwhelmed due to overcrowding).
- 2.19. This understanding is therefore in keeping with the European Standard BS ISO 22395:2018 on supporting vulnerable persons in an emergency which states:

*'a vulnerable person is not defined by the nature of the vulnerability but by their personal circumstances at the time'.*

<sup>3</sup> What is safeguarding? OSCR, May 2018 <https://www.oscr.org.uk/guidance-and-forms/safeguarding-guidance-keeping-vulnerable-beneficiaries-safe/what-is-safeguarding/>

<sup>4</sup> Safeguarding Adults at Risk Definitions, Ann Craft Trust, <https://www.anncrafttrust.org/resources/safeguarding-adults-at-risk-definitions/>

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### 3. Policy and Procedures: Implementing, Reviewing and Improving

- 3.1. The safe management of vulnerable persons travelling on the Light Rail network should be approached like all other aspects of good safety management. This begins with a risk assessment, followed by an overarching organisational policy explaining the company's position, implemented through company procedure(s) and supported with guidelines to aid effective implementation.

#### Vulnerable Persons Policy and Risk Assessment

- 3.2. It is recommended that the first step in implementing an approach to managing vulnerable persons is developing and documenting an organisational vulnerable person(s) policy. This policy should be underpinned by a risk assessment detailing the potential risks for vulnerable persons with regard to that particular Light Rail organisation and its network.
- 3.3. It is envisaged the policy would also outline the organisational intent about ensuring the safety and security of vulnerable persons on the Light Rail network. This guidance document can be used to inform and develop this policy.
- 3.4. It is recommended that the policy contains clear lines of responsibility within the Light Rail organisation for safeguarding vulnerable persons, to ensure accountability and ownership.
- 3.5. Once developed and documented, the policy should be communicated across the organisation and made readily accessible. The policy will act as a ready reference source for employees to understand what is expected of them in terms of their attitudes, behaviour and actions should they identify or encounter a vulnerable person on the Light Rail network.

#### Vulnerable Persons Procedures

- 3.6. It is recommended that the vulnerable person(s) policy is implemented via a series of company procedures outlining specific instructions on how to execute different tasks or situations involving a vulnerable person.
- 3.7. The tasks or situations may reflect the areas covered in this guidance, for example, identifying and supporting vulnerable persons, suicide prevention, reporting incidents involving vulnerable persons and multi-agency working. These tasks or situations should also be informed by the risk assessment which would have identified the key risk areas to focus on, for that particular Light Rail organisation.
- 3.8. Additionally, it may be useful to add a section on vulnerable persons to existing risk assessment documentation to ensure vulnerable person risk is always considered and procedures to address the risks developed as needed.
- 3.9. In keeping with best practice in procedure development, it is recommended that stakeholders are consulted for their views, including Light Rail staff and also people with potential vulnerabilities. This will ensure the procedures are appropriate and effective both for the people using them, as well as the recipients of the care and support.
- 3.10. It may also be useful to consider creating some guidelines to sit alongside the procedures, to support people in implementing them effectively.

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Reviewing and Improving

- 3.11. It is recommended that the policy, procedures, and vulnerable person risk assessments are regularly reviewed and where necessary updated to ensure they remain relevant and fit for purpose.
- 3.12. Consideration should be given to setting up a Vulnerable Persons Working Group (VPWG) charged with staying informed about best practice in supporting vulnerable persons, which may provide an effective organisational means of staying abreast of current thinking. Feedback from the VPWG is then available to assist reviewing and updating the policy and procedures.
- 3.13. Other feedback, such as lessons learnt from incidents involving vulnerable persons should also be fed back into the existing policy and procedures, thereby creating a cycle of continuous improvement.
- 3.14. As part of the review and improvement process, the policy and procedures could also be used to help identify vulnerable person(s) training needs for new starters, refresher training for existing staff members and any new training required if / when the policy and / or procedures are modified.

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#### 4. Identifying Vulnerable Persons

- 4.1. As explained above, vulnerability can be a temporary state, which may either improve or deteriorate with time depending on the developing situation. Someone not normally deemed vulnerable may become so in the event of overcrowding or a major incident or other emergency, conversely, someone with a vulnerability may travel independently and without the need for any assistance. The key issue is being able to identify vulnerable individuals as they present themselves.

##### Understanding Vulnerabilities

- 4.2. This document presents a definition of vulnerable person(s) (refer to 2.10), as well as which individual factors may put someone at risk of becoming vulnerable. This guidance also presents the term safeguarding (refer to 2.15) as a structured means of protecting vulnerable person(s).

##### *Developing a Company Definition*

- 4.3. It is recommended that Light Rail organisations use these definitions to develop their own definition of what constitutes an individual vulnerability on their part of the Light Rail network.
- 4.4. Their definition may include a list of the different types of vulnerabilities that exist (for example, mental or physical disability, temporary physical or emotional state, under 18's, etc.) and how these vulnerabilities may be impacted by the Light Rail environment (for example, a sensory vulnerability may be triggered by loud alarms or announcements). Light Rail operators may want to involve their VPWG to provide feedback on the latest thinking around vulnerabilities.

##### *Sharing the Company Definition*

- 4.5. It is recommended that the finalised definition should then be shared with all members of staff and form the basis of any staff training on identifying and managing vulnerable person(s).

##### Identifying Vulnerable Individuals

- 4.6. Vulnerable persons are likely to fall into two categories: those who present themselves to staff in need of help and those that do not. In both cases, the extent of the vulnerability may not always be immediately clear.
- 4.7. It is not the responsibility of Light Rail staff to diagnose specific physical or mental illnesses or disabilities. Their role is to recognise when additional support, or intervention from partner agencies such as the BTP or health and social care professionals, may be required.

##### *Key Vulnerabilities with Working Examples*

- 4.8. It is recommended that Light Rail operators use their own agreed definition of what constitutes a vulnerability to support staff in identifying when help or intervention may be required. For example, if staff are approached by someone who is not verbally lucid whilst also looking visibly distressed, then this should be indication enough that this person is vulnerable and needs help.
- 4.9. Similarly, if someone has not presented themselves to staff as needing help but has spent a lot of time on a tramstop platform without boarding a vehicle, this may be an indication that this person

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is mentally vulnerable and may need immediate support (see Section 8 on Suicide Prevention for further details).

- 4.10. It is recommended that Light Rail operators create a list of potential vulnerabilities with supporting examples to aid staff in identifying vulnerable individuals. This list and examples can also form the basis of company training on vulnerable person(s).

*Training for Identifying Specific Vulnerabilities*

- 4.11. It is recommended that Light Rail operators consider what types of training could be useful for their particular tramstop and / or part of the Light Rail network, as certain locations may see a higher number of specific types of vulnerability than others. For example, staff working at a tramstop located near an eye hospital may require training on recognising visually impaired travellers, as well as training on how to communicate with them and appropriately guide or direct them through the tramstop.
- 4.12. The Samaritans offer a 'Managing Situations With Vulnerable People'<sup>5</sup> course which covers identifying and managing situations with vulnerable people.

*Early Identification With Registration System*

- 4.13. Some operators may also want to consider an online or telephone system where vulnerable person(s) or their carer's can voluntarily register that they are travelling through a tramstop / Light Rail system. This provides reassurance to the vulnerable person that their needs will be met should they need extra support and allows the operator to be prepared and ready to support them.

*Risk to Light Rail Staff*

- 4.14. It is important to be aware that Light Rail staff may become at risk as a consequence of coming into direct contact with a person deemed vulnerable (for example, someone intoxicated or having a psychotic episode). In this example, it would not be possible to anticipate how the vulnerable person might react, which might render a staff member to become unsafe. It is therefore important to consider the risk to Light Rail staff in supporting vulnerable persons and put in place control measures as appropriate.

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<sup>5</sup> Course: Managing situations with vulnerable people, Samaritans, <https://www.samaritans.org/how-we-can-help/workplace/workplace-staff-training/course-managing-situations-vulnerable-people/>

## 5. Communicating With Vulnerable Persons

- 5.1. Communicating effectively with vulnerable person(s) is a critical part of managing their safety and security whilst on a Light Rail network. It allows information to be gathered and shared by both parties, and the appropriate support to be identified and implemented. It is therefore important that communication channels and content are both carefully considered by Light Rail operators.

### Communication Channels

- 5.2. Communicating with vulnerable persons will largely fall into two categories: verbal communications and non-verbal communications.

### *Verbal Communications*

- 5.3. Verbal communications are likely to occur directly between the vulnerable person and the member of staff present, perhaps at a time of emotional distress or extreme need, for the vulnerable person. This will therefore be a critical verbal exchange between two people and one that should be handled with due care and sensitivity, whilst also offering practical advice and support.
- 5.4. A key skill required by Light Rail staff during this exchange will be the ability to actively listen. It will be important to gather as much information as possible, whilst also helping to make the vulnerable person feel as though they have been heard. It will be important not only to hear what they are saying, but also to notice how they are saying it (for example, in a hushed or rushed tone, looking fearful or tearful, etc.). This will all help to build a picture of that person's level of vulnerability at that point in time.
- 5.5. Once the vulnerable person has been able to speak and be heard, the staff member will need to decide what action(s) to take next. It may be that they can offer the help and advice the vulnerable person needs to support them on the next stage of their journey. In this case, the staff member should speak clearly, calmly and at an appropriate pace. It may also be relevant to provide additional information in the form of leaflets, contact numbers, directions, etc.
- 5.6. If additional help and support is needed from outside agencies, then the staff member should advise the vulnerable person that they are seeking additional help and take them to a safe place to wait until that help arrives.
- 5.7. It is important that staff receive full training in the verbal communications skills outlined above. It is also important that staff are aware of how, when and who to contact should extra support be required. The Samaritans offer a 'Conversations With Vulnerable People' course<sup>6</sup> which covers everything from identifying vulnerabilities through to signposting people to further support.

### *Non-Verbal Communications*

- 5.8. Non-verbal communications are a way of sharing information with potentially vulnerable people, without having a conversation. It is recommended that Light Rail operators carefully consider which channels they choose to share information on and in what format.

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<sup>6</sup> Course: Conversations with vulnerable people, Samaritans <https://www.samaritans.org/how-we-can-help/workplace/workplace-staff-training/course-conversations-vulnerable-people/>

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- 5.9. Non-verbal communications may be in a digital format, for example, via the operator's website, travel app, real time electronic signage or social media channels. Alternatively, information may be provided in a non-digital format, such as posters and leaflets placed around the tramstop and on vehicles. It is recommended that Light Rail operators provide communications in both a digital and non-digital format to ensure the information is as widely accessible as possible.
- 5.10. It is recommended that Light Rail operators also consider wider communication needs. For example, communications in audio (loudspeaker) or sign language for the hearing impaired; braille or large print for the visually impaired; different languages for tourists or people where English is not their first language; and illustrations only for non-readers or learning impaired, etc.

Communications Content

- 5.11. Once the most effective and appropriate communication channels have been decided, the Light Rail operator should consider what content they want to communicate specifically to vulnerable person(s), over and above the general information that is being communicated to all travellers. Information that may be useful to consider making available includes:
- Tramstop contact details for specialist accessibility support;
  - Tramstop accessibility facilities;
  - Mental health help or support lines;
  - Help with onward specialist transportation;
  - Information about travel support groups;
  - Provision for assistance animals (for example, guide dogs); and
  - Human trafficking help and support lines.
- 5.12. Information about where to get emergency help and support should also be provided, outside of the general emergency preparedness provision, as the needs of vulnerable person(s) in an emergency will differ from that of non-vulnerable person(s) (see Section 7 on supporting vulnerable persons in an emergency for further information).

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## 6. Strategies for Dealing With Vulnerable Persons

6.1. Once a vulnerable person presents themselves on the Light Rail network it will initially be the responsibility of that member of staff to respond to that individual in an appropriate, supportive, and effective way. It is therefore important that Light Rail operators have a clear and straightforward approach for staff to follow should they find themselves in this situation. This approach should not differ depending on the specific nature of the vulnerability, but rather be a standard approach that staff can be trained to apply as necessary.

### Cross-Industry Approach

6.2. In November 2015 the Association of Train Operating Companies (ATOC) (now part of the Rail Delivery Group) agreed with the BTP a common approach<sup>7</sup> that staff members should follow when responding to vulnerable person(s). The approach is in the form of the following sequential steps:

1. **Be Aware** Always be aware of individuals moving in and around the tramstop and on transportation. Children and adults who are at risk of harm, vulnerable, suicidal and / or victims of crimes (for example, unwanted sexual behaviour, child exploitation, trafficking) will frequent tramstops and use the Light Rail network.
2. **Be Concerned** Be curious about individuals, ask questions about their safety, their wellbeing, and their welfare, to check that they seem okay.
3. **Listen** If you ask a vulnerable person a question, closely listen to their answer. Sometimes it's not what they say, but how they say it, so take note of the way they are speaking or how they look when they are saying it. Always take what individuals say seriously, and always treat them with respect and dignity.
4. **Reassure** Showing kindness and consideration in your response provides reassurance; offer to provide appropriate help and support.
5. **Report** Encourage the vulnerable person(s) to seek additional support, to report any offences and report any concerns about others to the BTP. In an emergency always call 999.

6.3. It is recommended that Light Rail operators develop this approach for their own organisation. It is also recommended that this approach forms part of the company's managing vulnerable person(s) policies and procedures (see Section 3 of this guidance).

### Staff Training

6.4. It is recommended that all staff are trained on the approach for responding to vulnerable person(s) as part of their company induction and that it also forms part of a package of refresher training. Furthermore, if this approach is changed or updated then staff should be informed of the changes and receive further training as appropriate.

6.5. A key part of training will be understanding exactly who should be contacted in different circumstances and how to contact them. It may be useful to consolidate training with a follow up contact card containing key numbers, such as the local BTP contact or local Samaritans.

<sup>7</sup> ATOC Guidance Note: Responding to Vulnerable Persons, November 2015 - <https://www.raildeliverygroup.com/about-us/publications/acop/290-respondingtovulnerablepersons/file.html>

- 6.6. As mentioned above, the Samaritans offer a 'Managing Situations with Vulnerable People' course which covers identifying and managing situations with vulnerable people.
- 6.7. In the case of suicide prevention, the BTP and Samaritans have completed a significant amount of work with the rail industry and developed significant training and guidance on how and when staff members should intervene with an individual they suspect is contemplating suicide. Staff training in this area is covered in the Section 8 on Suicide Prevention.

Other Initiatives to Consider

- 6.8. Aside from the direct response provided to vulnerable person(s), there may also be other initiatives Light Rail operators would like to consider enhancing the safety and security of potential vulnerable persons traveling on their part of the Light Rail network as referred to below.

*Secure Stations Scheme*

- 6.9. The Secure Stations scheme is an opportunity for Light Rail operators to demonstrate how they are working with partners to reduce crime and play a greater role in safeguarding vulnerable person(s) who might be at tramstops. Having an accredited tramstop provides reassurance to both passengers and staff that the tramstop is a safe and secure environment. This national scheme covers all rail networks which are policed by the BTP.<sup>8</sup>

*Disruption Management*

- 6.10. Disruption can occur without warning, for example, a crime, suicide, or breakdown, are just some of the ways an otherwise well-planned and non-eventful trip can quickly and unexpectedly change shape, possibly creating significant delays and changes. A trip involving multiple changes or modes of transport will further exacerbate the disruption impact.
- 6.11. Such disruption can have a negative impact on all passengers, but for those relying on the assistance of tramstop staff at connecting tramstops the negative impact can be huge if delays or route changes mean no one is there to support them as they arrive at a tramstop needing onward assistance. It is therefore recommended that operators consider how they manage the impact of disruption on vulnerable passengers needing assistance to complete their journeys despite the disruption.
- 6.12. The specific management of disruption on the network is outside the scope of this guidance, however RSSB provide some useful guidance<sup>9</sup> in this area which provides a starting point for Light Rail operators to consider how they manage vulnerable persons during disruption.

*Tramstop and Carriage Overcrowding*

- 6.13. While there is not much evidence of a direct passenger health and safety risk from overcrowding, passengers can feel stressed, anxious, or vulnerable in crowds. Anyone with visible or non-visible

<sup>8</sup> British Transport Police Secure Stations Scheme: Guidance Notes - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/674732/secure-stations-guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674732/secure-stations-guidance.pdf)

<sup>9</sup> Managing Disruption, RSSB, <https://www.rssb.co.uk/en/what-we-do/key-industry-topics/performance/managing-disruption>

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disabilities, older people or those travelling with young children can experience these negative effects more.<sup>10</sup>

- 6.14. As with disruption, the management of crowds at tramstops and on platforms is outside the scope of this guidance, however it is recommended that where appropriate Light Rail operators consult RSSB's 'Good Practice Guidance on Crowd Management'<sup>11</sup> to minimise the likelihood of people becoming vulnerable whilst in transit on the Light Rail network.

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<sup>10</sup> Office of Rail and Road (ORR) – Our role in relation to station and train crowding - <https://www.orr.gov.uk/guidance-compliance/rail/health-safety/passenger-safety/our-role-relation-station-and-train-crowding>

<sup>11</sup> Crowd Management - Good Practice Guidance, 2020 - <https://www.rssb.co.uk/en/what-we-do/key-industry-topics/platform-train-interface/passenger-behaviour/crowd-management-good-practice--guidance>

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## 7. Supporting Vulnerable Persons In An Emergency

- 7.1. Should an emergency occur whilst a vulnerable person(s) is travelling on the Light Rail network or within the boundaries of a tramstop, or someone becomes vulnerable as a consequence of an emergency situation, then operators should consider the practical, physiological and psychosocial support vulnerable persons may need during and after the emergency incident.
- 7.2. It is important to note that this section does not relate to a personal emergency for the vulnerable person(s) themselves, but rather a wider emergency (for example, terrorist attack, major fire, building collapse, etc.), that the vulnerable person happens to find themselves involved in.
- 7.3. The following sections are based upon the key learnings for Light Rail operators from European Standard BS ISO 22395:2018.

### Practical and Physiological Support In An Emergency

- 7.4. It is recommended that Light Rail operators consider the following practical measures that may be required for supporting vulnerable person(s) in an emergency and integrate these into their existing emergency response plan:
- Consider and account for the longer time frame needed to execute an emergency response activity when vulnerable persons are involved;
  - Consider the mechanism through which to deliver additional practical support, for example, through establishing relationships with local agencies, organisations, and charities (see Section 9 for more information on multi-agency working);
  - Consider having staff or other volunteers ready to pair up with vulnerable person(s) in the event of an emergency to provide extra support and practical guidance;
  - Consider how vulnerable person(s) may safely and securely travel away from the affected area;
  - Consider having specialist equipment available for supporting vulnerable persons to evacuate during an emergency (for example, evacuation chairs for physically disabled people); and
  - Consider the availability of other mobility aids should they be required (for example, walking aids, wheelchairs).

### Psychosocial Support In An Emergency

- 7.5. It is recommended that Light Rail operators consider the following psychosocial measures that may be required for supporting vulnerable person(s) in an emergency and integrate these into their existing emergency response plan:
- Consider identifying and training staff or other volunteers to emotionally support the vulnerable person(s) and their carers (should they be present) to help reduce the stress of being in an emergency;
  - Consider how help can be provided to contact vulnerable person(s) carers, relatives or close friends to secure support and ease anxiety for the vulnerable person(s);
  - Consider provision for vulnerable person(s) assistance dogs (for example, guide dogs, hearing dogs, medical alert dogs, autism dogs, etc.) to reduce anxiety about the animal's presence and welfare; and

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- Consider providing information to the vulnerable person(s) about ongoing mental health support following an emergency (see Section 9 for more information on multi-agency working).

Emergency Preparedness

- 7.6. Although not within the scope of this guidance, operators may find additional reading relating to emergency planning useful to help consider the needs of vulnerable person(s) in the event of an emergency. For example, the Rail Delivery Group has produced useful guidance in this area.<sup>12</sup>

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12 Guidance Note – Emergency Planning - Knowledge, Understanding and Responsibilities, Rail Delivery Group, November 2017

<https://www.raildeliverygroup.com/about-us/publications/acop/246-emergencyplanning-knowledgeunderstandingandresponsibilities/file.html>

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## 8. Suicide Prevention

- 8.1. In England and Wales in 2019 there were 5,691 deaths caused by suicide. The rate was highest for the age groups between 40 and 54 years, and men were three times more likely than women to take their own lives.<sup>13</sup>

### Suicide and the Transport Network

- 8.2. There has always been a strong connection between suicide and transport; for example, the rail network alone sees an attempted or completed suicide every 31 hours<sup>14</sup>.
- 8.3. To address this there are long established and successful partnerships between stakeholders like Network Rail<sup>15</sup>, the BTP and the Samaritans. Each organisation understands the important and active role that rail industry staff, especially those working at tramstops, can play in reducing the risk of suicide.

### Suicide Prevention Strategy

- 8.4. In November 2016 a Suicide Prevention Duty Holders Group (SPDHG) launched rail industry guidance containing key activities to create a suicide prevention plan. The Department for Transport (DfT) adopted these activities as the minimum commitment Train Operating Companies (TOCs) would be asked to make to support suicide prevention on the rail network<sup>16</sup>.
- 8.5. It is recommended that Light Rail operators should also consider committing to these same activities as they represent an established series of measures, supported by the DfT, that are relevant and applicable in a Light Rail environment. Implementing the following suicide prevention measures are therefore suggested.

### *Establishing Suicide Prevention Leadership and Resources*

- 8.6. It is recommended that Light Rail organisations consider appointing a Suicide Prevention Champion (SPC) to champion the cause at Board level and a Suicide Prevention Plan Coordinator (SPPC) to implement the plan on a day-to-day basis.
- 8.7. It is also recommended that Light Rail operators identify what other resources may be available to provide suicide prevention support. For example, the BTP and Samaritans have both been key partners to the rail industry (see Section 9 for more information on multi-agency working).

13 Suicide Prevention: Policy and Strategy, Briefing Paper. House of Commons Library, Number 08221, 21 April 2021, <https://researchbriefings.files.parliament.uk/documents/CBP-8221/CBP-8221.pdf>

14 Preventing suicide in England: Third progress report of the cross-government outcomes strategy to save lives, HM Government, January 2017, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/582117/Suicide\\_report\\_2016\\_A.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/582117/Suicide_report_2016_A.pdf)

15 Network Rail, Suicide Prevention on the Railway, <https://www.networkrail.co.uk/communities/safety-in-the-community/suicide-prevention-on-the-railway/>

16 Rail Industry Suicide Stakeholder Group (RISSG), Measures employed by the rail industry to prevent suicides on the network, June 2020

*Understanding the Risks*

- 8.8. A key part of any suicide prevention plan is understanding at which locations suicides are most likely to occur. It is therefore recommended that Light Rail operators consider conducting an analysis of the key risk areas across their network.
- 8.9. Risk data may come from local knowledge, a history of suicides and suicidal behaviour across a particular route or tramstop location and any data analysis and / or geospatial mapping undertaken by the BTP or Light Rail operators themselves. High-risk locations can be identified and prioritised by Light Rail operators for different levels of intervention based on their risk ranking.

*Implementing Physical Prevention Measures*

- 8.10. It is recommended that Light Rail operators consider implementing physical suicide prevention measures. For example, making tramstops as visible as possible by cordoning off 'hiding places' and implementing security lighting, CCTV, and security patrols, which all help to limit the places people can stop and quietly contemplate suicide.
- 8.11. Fatality memorials have also been shown to increase the likelihood of more suicides in that same location, as well as creating risk to people laying and looking at the memorials. Serious consideration should therefore be given to removing memorials from the area.<sup>17</sup>

*Promoting Lifesaving Interventions*

- 8.12. The rail industry has learnt that one of the most effective means of preventing suicides on the rail network is to intervene. This relies on members of the public and tramstop staff being able to interrupt people in the act of taking their life. It is therefore recommended that Light Rail operators consider interventions like those adopted on the rail network. For example, in November 2017 Network Rail, the BTP and the Samaritans launched the campaign 'Small Talk Saves Lives'<sup>18</sup> which encouraged members of the public to approach someone who looked like they were contemplating suicide and to make small talk, to try and bring them out of a suicidal train of thought.
- 8.13. Similarly, providing staff with materials and training on how to intervene in a suicide attempt will provide them with the confidence and encouragement to do so. Additionally, promoting the BTP's suicide prevention hotline number to passengers and staff will provide them with a means of immediately instigating the deployment of an emergency response should someone be suspected of being in the act of contemplating suicide.

<sup>17</sup> National Suicide Prevention Programme, Fatality memorials / tributes on the network, RISSG, 2016

<sup>17</sup> Samaritans, Small Talk Saves Lives campaign, <https://www.samaritans.org/support-us/campaign/small-talk-saves-lives/>

<sup>18</sup> National Suicide Prevention Programme, Fatality memorials / tributes on the network, RISSG, 2016

<sup>18</sup> Samaritans, Small Talk Saves Lives campaign, <https://www.samaritans.org/support-us/campaign/small-talk-saves-lives/>

### Train Staff To Intervene In Suicide Events

- 8.14. Bespoke suicide intervention training for all members of staff with the potential to meet people who may be contemplating suicide is an essential activity to consider. This training should provide staff members with the knowledge, skills, and abilities, as well as confidence, to intervene.
- 8.15. It is therefore recommended that Light Rail operators firstly identify which staff may benefit from this type of training, for example, any frontline staff at high-risk locations. Also, importantly, other workers who may come into contact with vulnerable person(s), for example, maintenance staff, revenue protection officers, volunteer helpers, café staff, cleaners, etc.
- 8.16. Suicide prevention training courses that are freely accessible include those from the Zero Suicide Alliance<sup>19</sup> (a collaboration of National Health Service trusts) and from Health Education England<sup>20</sup>.
- 8.17. The Samaritans also offer a course on 'Managing Suicidal Conversations'<sup>21</sup> which includes understanding the factors leading to suicidal thoughts and how to manage a suicidal conversation sensitively and effectively.

### *Promoting Help Seeking Behaviour*

- 8.18. It is recommended that Light Rail operators promote help seeking behaviour among those groups of people most at risk of contemplating suicide. The railway industry has worked with the Samaritans to create awareness raising campaigns which can be implemented in tramstops, as well as the main routes to and from tramstops. For example, one campaign called 'Real People Real Stories'<sup>22</sup> sees men who have overcome tough times sharing their stories to encourage other men to seek help by contacting the Samaritans 24 / 7 free on 116 123 or via samaritans.org. Posters should be displayed at locations where they have the potential to influence behaviour or enter the consciousness of individuals.
- 8.19. Other awareness raising activities at tramstops where the potential for suicide events is high is also recommended, as are events at high footfall tramstops where the support the Samaritans provide to vulnerable person(s) can be more widely promoted.

### *Providing Staff With Trauma Management Support and Resilience Training*

- 8.20. The impact of a suicide on the Light Rail network is far reaching; being directly or indirectly involved in a suicide can be a traumatic experience and Light Rail operators should consider providing mental wellbeing support to staff following an incident.

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19 Suicide Awareness Training, [www.zerosuicidealliance.com](http://www.zerosuicidealliance.com)

20 NHS Health Education England and Public Health England, We need to talk about suicide, e-Learning Module, [www.nwyhelearning.nhs.uk/elearning/HEE/suicideprevention](http://www.nwyhelearning.nhs.uk/elearning/HEE/suicideprevention)

21 Course, Managing Suicidal Conversations, Samaritans <https://www.samaritans.org/how-we-can-help/workplace/workplace-staff-training/course-managing-suicidal-conversations/>

22 Samaritans, Real People Real Stories campaign <https://www.samaritans.org/support-us/campaign/real-people-real-stories/>

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8.21. The rail industry provides a well-established exemplar of what operators may consider providing. For example, the Samaritans have produced resources to support trauma management and resilience amongst staff who may be involved in traumatic incidents<sup>23</sup>.

8.22. The Samaritans can also provide post incident support by attending a tramstop following a suicide incident to provide emotional support to staff and passengers, as well as hand out materials and information. The Samaritans offer the service when they become aware of an incident, or an operator can call them direct.

*Working In Collaboration With Local Authorities and Communities*

8.23. Preventing suicides requires a multi-agency approach. Through the Public Health Director all Local Authorities are responsible for suicide prevention in their local area and must have a Suicide Prevention Steering Group (SPSG) and a Suicide Prevention Action Plan (SPAP) in place.

8.24. It is therefore recommended that Light Rail operators consider asking to become a stakeholder in their local SPAP and having a place on the SPSG as an important step in progressing their own suicide prevention approach, as well as encouraging collaborative working. A case study documenting collaborative working at Milton Keynes and Bletchley train tramstops provides a useful insight into how different agencies can work together to address high risk areas<sup>24</sup>.

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23 Samaritans, Support for people affected by traumatic rail incidents, <https://www.samaritans.org/how-we-can-help/workplace/rail-industry-suicide-prevention-programme/support-people-affected-traumatic-rail-incident/>

24 Working collaboratively to prevent suicides at Milton Keynes and Bletchley train stations - A case study, RISSG, November 2018

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## 9. Multi-Agency Working

9.1. Multi-agency working is critical to the early and effective identification of risk to vulnerable person(s), and to preventing those risks from escalating. This guidance document has already underlined the importance of effective multi-agency working in terms of a joined-up approach to suicide prevention. Much of the improvement and success in this area is down to strong partnership working.

9.2. Ideally key relationships will bring about improved information sharing, effective joint decision making and coordinated action<sup>25</sup>.

### Key Partner Agencies and Organisations

9.3. There are several key agencies for Light Rail operators to consider working alongside in terms of managing vulnerable person(s) on the Light Rail network, including:

#### *British Transport Police (BTP)*

9.4. In addition to providing a service to the main railway network, the BTP are also responsible for policing Docklands Light Railway, West Midlands Metro, Croydon Tramlink and the Sunderland Metro.

9.5. BTP's specialist policing approach is based on keeping passengers and staff safe and minimising disruption and they are on the frontline when it comes to preventing and responding to suicide. It is recommended that Light Rail operators contact the local representative for their part of the Light Rail network.

#### *Samaritans*

9.6. The Samaritans are the main organisation working with the railway industry to improve practice in relation to suicide education and training, prevention and "postvention" (dealing with the aftermath of incidents).

9.7. It is recommended that Light Rail operators consider contacting their local branch<sup>26</sup> to discuss how they can work together more closely through awareness raising initiatives, information sharing and even referrals<sup>27</sup>.

#### *Local Authorities*

9.8. As outlined previously in this guidance, all Local Authorities are responsible for suicide prevention in their local area and must have a SPSG and a Suicide Prevention Action Plan (SPAP) in place. It is therefore recommended that Light Rail operators consider asking to become a stakeholder in their local SPAP and having a place on the SPSG as an important step in progressing their own suicide prevention approach, as well as encouraging multi-agency working.

25 Home Office – Supporting vulnerable people who encounter the police - - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/405397/6.379\\_Supporting\\_guidance\\_web\\_doc\\_v3.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/405397/6.379_Supporting_guidance_web_doc_v3.pdf)

26 Samaritans, Find a branch, <http://www.samaritans.org/branches>

27 Preventing suicide on the rail network: a good practice guide, Part 2: Multi-agency working (May 2018)

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*Local NHS and Other Healthcare Providers*

- 9.9. Local healthcare providers are important to engage with and work alongside in terms of raising awareness and vulnerable person(s) referrals. These include primary care providers, mental health services, acute general hospitals, and more specialist groups such as substance misuse services. It is therefore recommended that Light Rail operators consider contacting local branches to encourage information sharing and collaboration.

*Other Local Agencies and Organisations*

- 9.10. Light Rail operators should also consider opportunities to work with other local health and social care groups who engage with those struggling to cope in the wider community (for example, local mental health services and support groups, housing support groups, drug / alcohol support groups, schools, colleges and universities) and organisations who have a particular interest in the railway or the wider transportation network (for example, Rail Pastors, 'Friends of' Groups, commuter groups).

A formalised Approach To Multi-Agency Working

- 9.11. Light Rail operators may also want to consider formalising their multi-agency working and information sharing arrangement. A common model adopted is the Multi-Agency Safeguarding Hub (MASH), which aims to improve the safeguarding response for children and vulnerable adults through better information sharing and high quality, timely safeguarding responses<sup>28</sup>.
- 9.12. The Milton Keynes and Bletchley train stations case study also provides useful insights into how different agencies can work together to support vulnerable person(s) at key high risk locations<sup>29</sup>.
- 9.13. It is important to note that whilst multi-agency working is critical in protecting children and vulnerable person(s), all agencies should continue to retain their individual duties to identify, protect and support a child or vulnerable person(s).

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28 Home Office, Multi Agency Working and Information Sharing Project, Final Report, July 2014 - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/338875/MASH.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/338875/MASH.pdf)  
29 Working collaboratively to prevent suicides at Milton Keynes and Bletchley train stations - A case study, RISSG, November 2018

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## 10. Information Sharing

- 10.1. Effective sharing of information about vulnerable person(s) between agencies and professionals, whilst respecting necessary confidentiality, is key to improving the experiences of vulnerable person(s) who find themselves in difficulty or even crisis on the Light Rail network.
- 10.2. Much of the guidance provided in this document outlines the importance of working collaboratively with other agencies to share information. Here we therefore provide some key guiding principles for Light Rail operators to use when considering sharing information about vulnerable person(s).

### Legislative Framework

- 10.3. A range of legal and ethical considerations apply, but perhaps the most prolific legislation about information sharing is the General Data Protection Regulation (GDPR) published in May 2018<sup>30</sup>. Like previous data protection laws regarding safeguarding, information about vulnerable individuals can still be collected, processed, shared and stored without consent if the data is deemed to be in the public interest.
- 10.4. Other legislative documents of relevance include:
- The Information Commissioners Data Sharing Code of Practice (May 2011)<sup>31</sup>;
  - Freedom of Information Act (2000)<sup>32</sup>; and
  - The Human Rights Act (1998)<sup>33</sup>.

### Guiding Principles

- 10.5. In April 2016 the Association of Train Operating Companies (ATOC) (now part of the Rail Delivery Group) provided guidance on some key guiding principles to apply when considering the sharing of personal data and information with other agencies, such as the BTP. It recommends that any information that operators consider sharing must be accurate, necessary, and proportionate<sup>34</sup>.

#### *Accurate*

- 10.6. All information must be accurate and relevant to the purpose for which it is being shared with proper reference made to the nature of the source and the intelligence itself.

#### *Necessary*

- 10.7. The necessity to share information is to work in partnership to fulfil an ongoing responsibility to ensure public safety and protect vulnerable person(s) using the Light Rail network.

<sup>30</sup> General Data Protection Regulation (GDPR), <https://gdpr-info.eu/>

<sup>31</sup> data\_sharing\_code\_of\_practice.pdf (ico.org.uk)

<sup>32</sup> Freedom of Information Act 2000 (legislation.gov.uk)

<sup>33</sup> Human Rights Act 1998 (legislation.gov.uk)

<sup>34</sup> ATOC Guidance Note – Information Sharing Protocol with the BTP, April 2016,

<https://www.raildeliverygroup.com/about-us/publications/acop/258-informationsharingprotocolwiththebtp/file.html>

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*Proportionate*

- 10.8. In considering whether to share personal information all partners have a duty to ensure that a fair balance is achieved between the protection of an individual’s rights and the general interests of society. In judging whether it is appropriate to share such information all partners will examine whether the identified purpose infringes upon the subject’s right to privacy, the appropriate measures to meet the purpose are both fair and rational and that the means used are no more than is necessary to accomplish the purpose.
- 10.9. It is therefore recommended that Light Rail operators consider applying these same guiding principles when considering sharing information as part of their duties to safeguard vulnerable person(s) on their part of the network.

Data Sharing Mechanisms

- 10.10. Once the decision is made to share information, this may either be verbally at the scene of an unfolding incident or via electronic means following an event. Where information is shared electronically it should always be through a secure electronic messaging system and then stored securely using up to date standards of encryption<sup>35</sup>.

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35 Information Commissioners Office (ICO), Encryption - <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/security/encryption/>

## 11. Incidents Involving Vulnerable Persons

- 11.1. The collection of data about incidents that occur on the Light Rail network provide huge learning potential for the whole industry. It is therefore a critical process and one that could provide a useful insight into incidents involving vulnerable person(s), should the incidents be recorded appropriately, and data used effectively.

### Current Incident Reporting Requirements

- 11.2. Current safety RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) reporting regulations<sup>36</sup> require Light Rail operators to immediately notify the Office of Rail and Road (ORR) about all reportable injuries, fatalities, and dangerous occurrences by the quickest practical means<sup>37</sup>. Non-serious incidents must also be reported but with less time urgency.
- 11.3. Reporting under RIDDOR allows for the incident notifier to advise that the incident involved a vulnerable person(s), however, this would be down to the notifiers discretion and therefore not all data about incidents involving vulnerable person(s) would necessarily be captured.

### Tram Accident and Incident Reporting (TAIR) Database<sup>38</sup>

- 11.4. In parallel with current reporting requirements, LRSSB are pioneering with an online reporting system TAIR that is aimed at enhancing tram safety. Most UK Light Rail networks now utilise this platform as their primary incident reporting database, meaning the industry's use of RIDDOR reporting is under consideration.
- 11.5. One of the aims of the TAIR is to standardise the way incidents are categorised and reported, helping to populate a comprehensive and robust model of potential hazards and risks that operators can use to help improve their own safety processes.

### Operator's In-House Reporting and Investigation Procedures

- 11.6. In addition to the statutory reporting requirements outlined above, it is recommended that Light Rail operators consider keeping their own record of incidents involving vulnerable person(s).
- 11.7. In keeping with the definition of vulnerability set out in this guidance, this may include individuals that were already vulnerable prior to the incident occurring (for example, physical or mental disability, elderly or very young, etc.), as well as those that became vulnerable because of the incident that occurred (for example, overwhelming anxiety, panic attack, etc.).
- 11.8. It is also recommended that the involvement of vulnerable person(s) is taken into consideration during any follow-up investigations, to understand both the nature of their vulnerability, their involvement in the incident and how the situation was concluded, alongside any lessons learnt (for example what worked well, what could have worked better, what could be done in the immediate term and what might be done differently in the future).

<sup>36</sup> Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (2013)

<https://www.legislation.gov.uk/ukxi/2013/1471/contents/made>

<sup>37</sup> ORR, Reporting RIDDOR Incidents, <https://www.orr.gov.uk/guidance-compliance/rail/health-safety/reporting-riddor-incident>

<sup>38</sup> About LRSSB, <https://lrssb.org/about/>

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Sharing Lessons Learnt

- 11.9. It is recommended that any lessons learnt from the incident involving vulnerable person(s) are shared, confidentially, both within the company as well as with the wider Light Rail industry via working groups.
- 11.10. In terms of sharing within the company, it is suggested that sharing lessons learnt via the company VPWG (see Section 3 of this guidance) would allow them to disseminate the lessons to the wider company and also incorporate any developments in thinking into company vulnerable person(s) policies and procedures.
- 11.11. In terms of sharing outside the company, using existing links with external groups, such as a SPSG (should the incident be relevant to suicide prevention), will provide an existing formalised channel for efficient and secure communications.

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## 12. Collaborative Working Among Light Rail Operators

12.1. This Guidance is primarily focused on how individual Light Rail operators manage the safety of vulnerable persons on their part of the Light Rail network. Individual operators will be most familiar with their network, transportation, and tramstops and therefore it makes sense they develop their own policies, procedures and interventions to support the potential vulnerabilities that may emerge whilst people are in transit.

12.2. However, despite the benefits of having local insight and knowledge, there is a lot that can be learnt from other Light Rail operators in different parts of the country. Working together will allow individual operators to benefit from the insights and experiences of other operators facing similar challenges.

### Sharing Initiatives

12.3. Having created a formal mechanism for sharing initiatives, operators may want to consider the different initiatives they would like to share.

### *Local Level Initiatives*

12.4. There may be local level initiatives that can be usefully shared. For example, one tram operator created an initiative where vulnerable people could apply for a badge asking people to offer them a seat<sup>39</sup>. This may also be something that other operators could implement at a local level should they face similar challenges.

### *Industry Wide Initiatives*

12.5. Active collaboration will also encourage and support the implementation of industry wide initiatives. For example, this guidance has outlined the importance of an industry wide approach to suicide prevention.

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<sup>39</sup> Edinburgh Trams, Help for priority customers, <https://edinburghtrams.com/news/help-priority-customers>

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## Appendix 1: Source / Related Documents

Safeguarding adults, Patient, <https://patient.info/doctor/safeguarding-adults-pro>

European Standard (BS ISO 22395:2018, 30 Sep 2018) - "Security and resilience. Community resilience. Guidelines for supporting vulnerable persons in an emergency" -

<https://shop.bsigroup.com/products/security-and-resilience-community-resilience-guidelines-for-supporting-vulnerable-persons-in-an-emergency>

What is safeguarding? OSCR, May 2018 <https://www.oscr.org.uk/guidance-and-forms/safeguarding-guidance-keeping-vulnerable-beneficiaries-safe/what-is-safeguarding/>

Safeguarding Adults at Risk Definitions, Ann Craft Trust, <https://www.anncrafttrust.org/resources/safeguarding-adults-at-risk-definitions/>

ATOC Guidance Note: Responding to Vulnerable Persons, November 2015 -

<https://www.raildeliverygroup.com/about-us/publications/acop/290-respondingtovulnerablepersons/file.html>

British Transport Police Secure Stations Scheme: Guidance Notes -

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/674732/secure-stations-guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674732/secure-stations-guidance.pdf)

Office of Rail and Road (ORR) – Our role in relation to station and train crowding -

<https://www.orr.gov.uk/guidance-compliance/rail/health-safety/passenger-safety/our-role-relation-station-and-train-crowding>

RSSB, Managing Disruption - <https://www.rssb.co.uk/en/what-we-do/key-industry-topics/performance/managing-disruption>

RSSB, Crowd Management - Good Practice Guidance, 2020 -

<https://www.rssb.co.uk/en/what-we-do/key-industry-topics/platform-train-interface/passenger-behaviour/crowd-management-good-practice--guidance>

Rail Delivery Group, Guidance Note – Emergency Planning - Knowledge, Understanding and Responsibilities, November 2017 - <https://www.raildeliverygroup.com/about-us/publications/acop/246-emergencyplanning-knowledgeunderstandingandresponsibilities/file.html>

Suicide Prevention: Policy and Strategy, Briefing Paper. House of Commons Library, Number 08221, 21 April 2021, <https://researchbriefings.files.parliament.uk/documents/CBP-8221/CBP-8221.pdf>

Preventing suicide in England: Third progress report of the cross-government outcomes strategy to save lives, HM Government, January 2017,

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/582117/Suicide\\_report\\_2016\\_A.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/582117/Suicide_report_2016_A.pdf)

Network Rail, Suicide Prevention on the Railway, <https://www.networkrail.co.uk/communities/safety-in-the-community/suicide-prevention-on-the-railway/>

Rail Industry Suicide Stakeholder Group (RISSG), Measures employed by the rail industry to prevent suicides on the network, June 2020

National Suicide Prevention Programme, Fatality memorials / tributes on the network, RISSG, 2016

Samaritans, Small Talk Saves Lives campaign, <https://www.samaritans.org/support-us/campaign/small-talk-saves-lives/>

Samaritans, Real People Real Stories campaign <https://www.samaritans.org/support-us/campaign/real-people-real-stories/>

Samaritans, Support for people affected by traumatic rail incidents, <https://www.samaritans.org/how-we-can-help/workplace/rail-industry-suicide-prevention-programme/support-people-affected-traumatic-rail-incident/>

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Working collaboratively to prevent suicides at Milton Keynes and Bletchley train stations - A case study, RISSG, November 2018

Home Office – Supporting vulnerable people who encounter the police - -

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/405397/6.379\\_Supporting\\_guidance\\_web\\_doc\\_v3.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/405397/6.379_Supporting_guidance_web_doc_v3.pdf)

Samaritans, Find a branch, <http://www.samaritans.org/branches>

Preventing suicide on the rail network: a good practice guide, Part 2: Multi-agency working (May 2018)

Home Office, Multi Agency Working and Information Sharing Project, Final Report, July 2014 -

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/338875/MASH.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/338875/MASH.pdf)

Working collaboratively to prevent suicides at Milton Keynes and Bletchley train stations - A case study, RISSG, November 2018

General Data Protection Regulation (GDPR), <https://gdpr-info.eu/>

ATOC Guidance Note – Information Sharing Protocol with the BTP, April 2016,

<https://www.raildeliverygroup.com/about-us/publications/acop/258-informationsharingprotocolwiththebtp/file.html>

Information Commissioners Office (ICO), Encryption - <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/security/encryption/>

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (2013)

<https://www.legislation.gov.uk/ukxi/2013/1471/contents/made>

ORR, Reporting RIDDOR Incidents, <https://www.orr.gov.uk/guidance-compliance/rail/health-safety/reporting-riddor-incidents>

About LRSSB, <https://lrssb.org/about/>

Centre for Transport Studies, Building Confidence – Improving travel for people with mental impairments, November 2017,

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/662737/report-on-mental-impairments\\_final.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/662737/report-on-mental-impairments_final.pdf)

Edinburgh Trams, Help for priority customers, <https://edinburghtrams.com/news/help-priority-customers>

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## Appendix 2: Related Training Courses

Samaritans, Conversations with vulnerable people, <https://www.samaritans.org/how-we-can-help/workplace/workplace-staff-training/course-conversations-vulnerable-people/>

Samaritans, Managing situations with vulnerable people, <https://www.samaritans.org/how-we-can-help/workplace/workplace-staff-training/course-managing-situations-vulnerable-people/>

Samaritans, Managing Suicidal Conversations, <https://www.samaritans.org/how-we-can-help/workplace/workplace-staff-training/course-managing-suicidal-conversations/>

Suicide Awareness Training, [www.zerosuicidealliance.com](http://www.zerosuicidealliance.com)

NHS Health Education England and Public Health England, We need to talk about suicide, e-Learning Module, [www.nwyhelearning.nhs.uk/elearning/HEE/suicideprevention](http://www.nwyhelearning.nhs.uk/elearning/HEE/suicideprevention)