

# UK Tram



ABSTRACT  
THIS DOCUMENT'S FOCUS IS ON HOW TO ACHIEVE A  
RELAXATION OF SEATING CAPACITY RESTRICTIONS.  
COVID-19

Tramway & Light Railway Guidance

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<b>SOURCE / RELATED DOCUMENTS:</b>				
The UKTram Covid-19 Industry Controls Guidance Index determines the UKTram Guidance. UKTram Light Rail Recovery Risks UKTram Guidance on Social Distancing. UKTram COVID-19 Passenger Communications, UKTram Light Rail Recovery Strength, Weakness, Opportunities and Threats (SWOT) Analysis. BEIS Working Safely Guidance Department for Transport (DfT) guidance; Coronavirus (Covid-19); safer transport guidance for operators				
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# Relaxing seat occupancy restrictions

## Introduction

On 23<sup>rd</sup> June the Prime Minister announced a move in the national pandemic alert level from 4 (a COVID-19 epidemic is in general circulation; transmission is high or rising exponentially) to 3 (a COVID-19 epidemic is in general circulation) and that as a result lockdown restrictions would be eased further in England from 4<sup>th</sup> July; this includes further opening up of the economy and a replacement of the 2 metre social distancing rule with a '1 metre plus' rule if 2 metres cannot be achieved.

Light Rail Operators in England had (where possible) restricting capacity significantly on vehicles to comply with social distancing as near to two metres as is possible within the physical constraints of the vehicles.

The purpose of this document is to outline the risk case for making more seats available for occupation.

## Risk Management

UKTram shared a generic Controls Guidance Index when Transport Sector Specific Guidelines were published by DfT in May. The resultant Controls Guidance Index has been used by Operators to undertake their own Operator specific risk assessments adjusting to their own unique operating conditions and risk profiles. The Controls Guidance Index outlined a set of control measures organised by a hierarchy of controls to mitigate the risk of COVID-19 transmission on vehicles. The Controls Guidance Index used the transmission routes identified by PHE of being within 2 metres of another person outside your household for more than 15 minutes, contamination via aerosol or coming into contact with contaminated surfaces.

The Light Rail industry has consistently used the best available published Government and scientific advice to inform the risk mitigations that it had implemented. In doing so it continued to provide an essential service to the various communities served throughout the lockdown period. As a result, the industry is more mature in its understanding of the risk controls that are practical to implement, passenger expectation and behaviour, and the needs of staff, than many industries that were closed during the lockdown period.

There have been changes which potentially impact the risk profile since the first assessment took place. In summary these are;

- On 15<sup>th</sup> June face-coverings became mandatory on public transport.
- On 23<sup>rd</sup> June the Prime Minister announced that the risk environment for transmission of the virus has changed with the alert level reducing from 4 to 3.
- He also announced a further easing of lockdown from the 4<sup>th</sup> July encouraging the economy to begin to restart.

The original Controls Guidance Index was undertaken at a time when the external risk environment presented a higher risk of the virus in the community and prior to the introduction of mandatory face coverings.

To inform the review, the Controls Guidance Index team used the SAGE document published on 4<sup>th</sup> June 2020 titled "Transmission of SARS-CoV-2 and Mitigating Measures". The document provides detailed analysis of risk controls using a safety hierarchy of controls. They

also used experience of implementing risk control measures over the previous months across different Light Rail operations.

A summary of the assessment undertaken against the SAGE paper with a cross-reference to the revised assessment undertaken by industry is below.

Hierarchy	Mitigation	Short Range	Air	Contact	Applicable on L-Rail	RA Ref
Elimination	Prevent the presence of an infector in the environment	✓	✓	✓	✓	Information and Guidance pre-boarding
	Remove the use of a particular environment	✓	✓	✓	✓	Cordoned areas
Substitution	Reduction of time spent in an environment	✓	✓	✓	✓	Time limited by customer churn
	Change work patterns to work in a cohort*	✓	✓	✓	✗	
	Move to outdoor working	✓	✓	✓	✗	
	Changes to restrict "loud" activities (e.g. reduce talking time, no singing)	✓	✓	✓	✗	
	Technology to replace face-to-face interactions			✓	✓	Actions to reduce contact with cash, availability of visas and face masks. Cordoned areas.
Engineering	Anti-microbial surfaces			✓	✓	At Operator discretion as part of cleaning and protection arrangements
	No-touch technologies			✓	✓	Actions to reduce contact with cash
	Provision of new hand wash stations			✓	✗	Difficult on vehicle
	Screens/partitions	✓	✓	✓	✓	Drivers isolated in cab environment. Changed protocols when leaving cab. Face masks/ visors for conductors.
	Increased fresh air ventilation rate	✓	✓	✓	✓	Advise that windows to remain open

	Change to room air distribution patterns	✓	✓	✓	x	
	Application of room scale air cleaning/UV devices	✓	✓	✓	x	
	Installation of local exhaust systems or local air cleaning devices	✓	✓	✓	x	
	Propping open internal doors to enhance airflow		✓		x	
	Personalised ventilation systems	✓	✓		x	
	Use of UV/HPV decontamination		✓	✓	x	
	Good maintenance of sanitation/drainage systems		✓	✓	x	
	Enhanced daylighting in buildings		✓	✓	x	
Administration	Frequency of high touch surface cleaning			✓	✓	Enhanced cleaning regimes
	Frequency of general room surface cleaning			✓	✓	Enhanced cleaning regimes
	Training on quality and effectiveness of cleaning			✓	✓	Enhanced cleaning regimes
	Provision of hand sanitiser			✓	✓	Drivers issued with hand sanitiser
	Replacement of jet dryers with paper towels		✓	✓	x	
	Avoid sharing equipment (e.g. IT, hot-desking )			✓	x	
	Management of waste			✓	✓	Enhanced cleaning regimes
	Hygiene behaviours in bathrooms (e.g. put the toilet seat down)		✓	✓	x	
	Changes to touch behaviours (e.g. education programmes)			✓	x	
	Lower density of occupants	✓	✓	✓	✓	Capacity limits

	Maintain 2m distancing	✓	✓	✓	✓	Promote spacing of passengers
	One-way systems for moving through spaces	✓			x	
	Orientation of people	✓		✓	✓	Facing seats taken out of use
PPE	Respirator (N95/FFP3) face masks	✓	✓		x	
	Surgical face masks	✓	✓		x	
	Face coverings	✓	✓		✓	Mandatory by law on public transport
	Gloves			✓	x	
	Protective clothing	✓		✓	x	
	Face shields/goggles	✓	✓		x	

As a principle, risk assessments and the resulting mitigation arrangements should be reviewed when factors which impact risk, either positively or negatively, change. Revised risk assessment and operational guidelines reflect the current status of knowledge of the COVID-19 pandemic and of effective preventive measures being used. It is important that the recommended measures are regularly evaluated and updated in line with changes in Government advice and the development of new preventive measures reflecting the evolution of the pandemic. It is important that as additional, reliable engineering risk mitigation measures become available the industry assesses these to remove burdens of behavioural compliance on our passengers and staff, whilst maintaining the appropriate level of health safety in accordance with the level of risk.

The key constraint that was discussed during the process is that seat pitches on light rail vehicles are typically less than the 1-metre social distancing, with a minimum of 720cm between seat-backs. To ensure appropriate mitigation the industry is applying layered protection, comprising actions by operators and passengers, set in the context of local and national rates of infection.

## Key measures in Risk Profile informing increase to seat occupancy e.g. every seat pair

### Operator actions ...

#### 1. Driver Protection

The driver is typically seated in an enclosed cab reducing their exposure to and from passengers boarding, cash is not collected by driver, cleaning of cab area enhanced therefore increased passenger capacity should not impact the driver.

#### 2. Restricting Capacity

Operators are continuing to deploy spare vehicles where available to alleviate any short-term overcrowding on routes. Some Operators are able to use real time passenger counting and CCTV technology to inform of potential problems.

Processes should be retained and refined to continue to control access to vehicles when possible. Improved information produced by operators on where the 'busy vehicles' are will enable passengers to plan alternative journeys and thus reduce crowding.

### **3. Orientation of People, allocated seating and Seat-backs**

Previous advice lead to seats on light rail vehicles where passengers face each other within 2 metres to be discouraged from use, therefore seated customers where all facing in the same direction and side by side contact should only occur with members of the same household. Seating allocation needs to be flexible enough to consider both the risk factors and the practical need for mitigation measures to be altered in different circumstances, such as, for example, between family members and individuals travelling together as part of the same household and not requiring physical distancing in between themselves.

Passengers should be encouraged to sit apart on the vehicle, with no more than one person per seat pair unless in household or other "bubbles". There are pros and cons to sitting alternately in window and aisle seat versus sitting in the window seat behind the person in front.

### **4. Ventilation**

The Controls Guidance Index required windows to be kept open. TfL has commissioned University College London to undertake some further work on mitigating measures of ventilation systems. TfL has offered to share this work.

### **5. Cleaning & Protection**

The Controls Guidance Index requires regular cleaning especially of touchpoints, waste minimisation and removal. Operators should consider emerging best practice around providing anti-viral protection and this may include products that bond to surfaces, removing viruses and providing long duration protection against recontamination.

Operators are engaging with PHE regarding understanding the impact of cleaning on high frequency touch-points and the potential for making improvements.

## **Passenger actions ...**

### **6. Mandatory wearing of face-coverings**

On Monday 15 June, it became compulsory to wear a face covering on public transport. Therefore, unless exempt, all passengers should now wear a face covering for the duration of their journey, reducing the risk of infection to other passengers. This is an additional risk mitigation measure which was not included in the original Controls Guidance Index. Operators are following the Government point guidance to encourage behaviour change starting with engaging, communicating and educating customers. Operators are also engaging with local police forces to assist.

*Although compliance rates are good and improving, it is important to recognise that behaviour change takes time and investment in education and enforcement. We have joined other industry groups in asking for Government support for a national public health campaign on the mandatory use of face-coverings and how to put them on and take them off safely to prompt the behaviour change that we need to increase compliance.*

## 7. Information and Guidance

The Controls Guidance Index recommends passenger guidance on where they can safely choose to sit to maximise social distancing. The operators are encouraged to do this in the way that is most appropriate to their own operations and customer community. For example, there is guidance at customer touch-points, including planning journeys at stops and on vehicles. It is recommended that there is additional clear guidance to passengers not to travel when symptomatic. This guidance will require review and amendment to incorporate the new arrangements to advise passengers that there should be one individual person per pair of seats.

### Contextual considerations ...

## 8. Average journey length and load factors

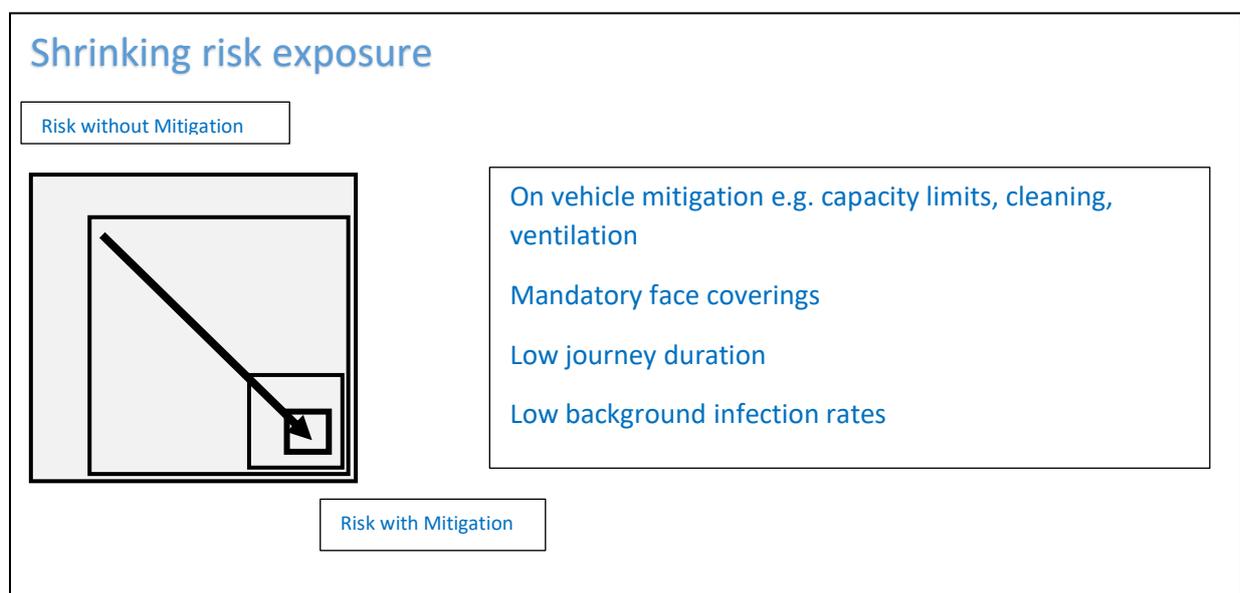
Data from a number of operators across the country indicates that the majority of passengers spend less than 15 minutes on the vehicle or that the average journey time, particularly in urban operations, is around 15 minutes. On most services, vehicles will not be busy for extended periods with routes typically experiencing increased loadings as they move toward a major attractor such as a town or city centre. These factors combine to mean that in most cases, passengers will not need to sit within 1 metre of other passengers for more than 15 minutes. Additional mitigations may be required when vehicles experience high passenger levels over extended periods.

## 9. Local rates of background infection are critical to any judgement

Operators will need to be responsive to local conditions. Capacity limits appropriate if infection levels are low, may not be appropriate if they rise significantly nationally or in a particular areas. Local partners will be able to advise on appropriate risks and mitigation response.

The industry therefore recognises that it needs to be agile, organised and able to re-introduce risk controls quickly in the event of the national risk level changing or the re-introduction of national or local lock-down measures.

Therefore a layered approach to risk minimisation is recommended:



The combination of on-vehicle mitigation measures + face coverings + short duration of passenger journeys + low background infection rates enables an appropriate risk environment for passengers against the context of national guidance “1m plus”.

National sector specific advice confirms that in these circumstances, the 1 metre distance is not an absolute requirement.

### **Conclusion**

Considering the measures above, we believe there are circumstances where, given the currently low rates of infection in the community, seating in every row can be permitted with a low level of risk. But should be conditional on some key factors as follows.

- Low rates of infection in the region and a system of alerting operators when local circumstances signify a need to revert to a 2m social distancing.
- Good rates of compliance with face covering legislation, supported by local Police forces and authorised travel officer where required.
- Additional mitigations when vehicles experience high passenger levels over extended periods