

TRANSPORT FOR LONDON

SAFETY, HEALTH AND ENVIRONMENT ASSURANCE COMMITTEE

SUBJECT: ANNUAL HEALTH, SAFETY AND ENVIRONMENT ASSURANCE LETTERS 2010/11

DATE: 2 AUGUST 2011

1 PURPOSE AND DECISION REQUIRED

- 1.1 To inform the Committee of the status of Health, Safety and Environment Management Systems (HSEMSs) in TfL at the conclusion of 2010/11 as reflected in the Health, Safety and Environment (HSE) Assurance Letters.
- 1.2 The Committee is asked to note the HSE Assurance Letters.

2 BACKGROUND

- 2.1 TfL introduced an annual HSE Assurance Letters process in 2005/06 whereby each business area makes an assessment of the status of its HSEMS(s) in relation to the requirements set out in the TfL Group HSEMS. The Letters are reviewed and signed off by the Chief Officer for each business area and reviewed by the Commissioner prior to submission to the Committee.

3 INFORMATION

- 3.1 Each business area is provided with a pro forma and guidance detailing the areas to be addressed in their HSE Assurance Letters.
- 3.2 This year in the HSE Assurance Letters, the implementation status of the various elements is addressed as being one of the following:
 - (a) **'Under development'** is considered to be work in progress;
 - (b) **'In place'** refers to documented processes and standards that have not yet been implemented in their entirety;
 - (c) **'Implemented'** is considered to be where all processes are documented and are being complied with by the business; and
 - (d) **'Implemented in full'** means that documented processes are being complied with by management with active monitoring, audit and review arrangements to effect continuous improvement.
- 3.3 The 2010/11 Health, Safety and Environment Assurance Letters from each of the business areas are attached as follows:

Appendix 1	London Underground
Appendix 2	Surface Transport

Appendix 3	London Rail
Appendix 4	Crossrail
Appendix 5	Corporate Directorates

4 RECOMMENDATION

4.1 The Committee is asked to NOTE the HSE Assurance Letters.

5 CONTACT

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Transport for London

LONDON UNDERGROUND

SUBJECT: Health Safety and Environment Assurance Letter for London Underground

DATE: 13 June 2011

1.0 Introduction

This Letter documents the status of the Health, Safety and Environmental Management System for London Underground (LU) at the end of March 2011.

2.0 Status of Health Safety and Environment Management System(s)

2.1 Health Safety and Environment (HSE) Policy

LU has adopted a Health, Safety and Environmental Policy that mirrors the TfL HSE Policy. This policy was endorsed by the LU Board and came into effect in January 2007.

The policy is available on the LU intranet, is contained within the Safety Certification and Authorisation documentation required by the Railways and Other Guided Transportation Systems (Safety) Regulations (ROGS) and is on display on notice boards in all LU stations, depots, offices and other premises.

Status	Implemented in full
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2.2 HSE Management Systems

The LU Health, Safety and Environment Management System (HSEMS) has been refined over twenty years and drives the ever improving HSE performance of the business. The core standards of the HSEMS are mandated on LU's supply chain that makes a significant contribution to LU's overall performance. These standards are in accordance with the criteria within the TfL Group HSE. Compliance with the LU HSEMS across the business is monitored through a structured audit programme.

During 2010/11, London Underground further developed its overall management system to include the Asset Performance Directorate, Project Managers and the Central Services directorates. LU's HSEMS now forms an integral part of the overall management system. Integration of the HSEMS into LU's comprehensive management system makes it easier for managers to comply with the requirements of the system and facilitates efficient compliance verification.

Status	Implemented in full
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2.3 Management Competence

Those management roles within LU that have significant health, safety and environmental accountabilities or responsibilities have been identified, recorded in job descriptions and reflected in LU's Safety Certification and Authorisation document.

LU has established and implemented a range of internal health and safety training courses for junior, middle and senior management/directors. The emphasis in respect of these courses is on those managers whose roles have the greatest impact on risk in the LU operational environment. During 2010/11 work was undertaken to improve environmental competence across the business by enhancing existing courses. This ensured the training needs identified in 2009/10 were met.

Status	Implemented in full
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2.4 HSE Objectives / Key Performance Indicators (KPIs)

LU delivered a comprehensive improvement programme in respect of health, safety and environment over the last year. The programme is developed on an annual basis and builds on previous programmes. The 2010/11 programme was endorsed by the LU Health, Safety, Environment and Climate Change Programme Board (HSECCPB) in May 2010. Progress of the programme against milestones was reported each period to the LU Executive Committee as part of the overall 'LU Plan'. This makes the status of actions highly visible and these actions are the subject of on-going monitoring and review.

LU has established a comprehensive set of Health, Safety and Environmental Key Performance Indicators (KPIs) which are used to measure performance. The KPIs include active and reactive indicators and pre-cursor events. Performance is reported regularly by a number of means at local and higher levels within LU. LU publishes a comprehensive health, safety and environmental performance report every quarter which is subject to detailed review by the HSECCPB.

Status	Implemented in full
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2.5 Risk Assessments

LU has established comprehensive arrangements for the assessment of health, safety and environment risk in respect of our customers, employees and others affected by our operations. These arrangements are set in place via the LU standards that have been implemented for the assessment and control of risk.

LU standards require that our risk assessments are subject to thorough review periodically, at times of change and following significant events, as appropriate. Our on-going programme of review has been adhered to, with work continuing in 2010/11 to integrate the former Metronet and LU procedures. In this way we ensure that our health and safety risks are maintained at levels that are as low as reasonably practicable.

Status	Implemented
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2.6 Meetings and Consultations

The HSECCPB met on a quarterly basis in 2010/11 and was chaired by the Director of Safety with members drawn from LU Directors and senior managers. Tube Lines have standing invitations for their Managing Director and Safety Director who attend on a regular basis.

The above committee is supported by the LU Directors' Risk Assurance Change Control Team (DRACCT) in order to provide an effective peer review function. Meetings were held at least every four weeks in 2010/11 and special meetings were held when necessary. The remit of the team encompasses the peer review/validation of change where this has significant health, safety, environment or business implications, peer review of all Formal Investigation Report recommendations and actions in advance of their implementation.

In addition, health and safety is a standing agenda item at LU's various directorate management meetings.

In respect of employee involvement and consultation, LU has established and implemented a health and safety consultation framework that facilitates employee involvement and consultation at strategic, operational and working levels. The LU HSEMS has been designed to ensure the statutory rights of employees and their representatives are met in terms of involvement and consultation in respect of matters of health and safety.

Status	Implemented in full
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2.7 Incident Reporting and Investigation

Through the implementation of the LU HSEMS, LU has established standards and processes for the reporting and investigation of incidents that facilitate the identification of the root causes of incidents and development and monitoring of corrective actions.

LU has a dedicated incident investigation team which investigates significant incidents. The team can also call on a number of safety managers/advisers and engineers trained in specialist investigation techniques. All Formal Investigation Reports (FIRs) issued over the past year have been subject to peer review by the LU DRACCT. Corrective actions and programme details/accountabilities were monitored via the HSECCPB and have been or are being monitored through to completion.

Status	Implemented in full
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2.8 Assuring HSE Performance

LU has established and implemented standards and processes for the audit of the LU HSEMS as part of the review of the management system. LU's standards require that the audit plan is risk-based and the programme is developed against set criteria and subject to wide consultation in draft before approval.

The SQE and technical audit programme for 2010/11 was approved by the HSECCPB and covered key LU health, safety and environment processes, operational and maintenance risk controls and specific topic areas. The audit programme also covers LU's key suppliers.

Audit results and actions have been reported in specific audit reports and in the quarterly LU Health, Safety and Environmental Performance reports. Progress against the programme is monitored regularly and reported to senior management. Audit reports are communicated to the audited section of the business and relevant senior management. Audit re-visits are undertaken on a risk basis to ensure that actions have been progressed. In addition to audit work undertaken via SQE, a programme of HSE System Checks is carried out across LU as part of local management assurance checks.

Status	Implemented in full
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2.9 Procurement Management

LU has implemented procurement standards and processes that ensure all our suppliers meet our HSE requirements at all stages of the procurement process. Compliance with these standards is managed throughout the procurement process. These are supported by robust contractual provisions relating to HSE management. Verification of higher risk activities are managed through LU's Assurance process, on site monitoring and performance reporting.

Status	Implemented in full
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2.10 Review of the Management System

LU is incorporating the review of its HSEMS into the annual review of the adequacy and effectiveness of the overall management system and related arrangements. The LU HSEMS was last subject to review in 2009. In between formal reviews, individual elements of the system have been (and will continue to be) subject to review in response to legislative changes or other events. Such changes have been controlled through the DRACCT change control process.

Status	Implemented in full
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3.0 Future HSEMS Developments

As part of the ongoing review and development of the LU HSEMS, a number of significant improvement actions are scheduled for 2011/12.

LU has a commitment to continuous improvement in health, safety and environmental management and performance. This means that LU regularly considers how performance can be improved. This is achieved through the respective health, safety and environmental improvement programmes each year. These programmes are approved by the HSECCPB and progress is monitored and reviewed throughout the year.

Detailed health, safety and environmental improvement programmes are part of the LU Plan, which is available on the LU intranet.

Some of the key areas where further improvements will be made over the coming year include:

- Renew LU's submission under Railways and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS)

- Delivery of a safety culture survey across LU and its suppliers
- Ongoing review and updating of our top event major accident risk models
- Continued implementation of the safety critical communications programme
- Continued delivery of health fairs for all TfL staff
- Environmental improvement actions including:
 - Full implementation of automated meter reading solution at 150 stations under Phase One of the project
 - Implementation of the LU Biodiversity Action Plan,
 - Further improving recycling at our stations, depots and project sites,
 - Delivery of a Low Carbon Stations project and low carbon heating solution for Northumberland Park Depot

This programme of improvements is an integral part of The Plan for 2011/12 and will be overseen by the Rail and Underground Board.

Mike Brown
Managing Director, London Underground

Transport for London
SURFACE TRANSPORT

SUBJECT: Health Safety and Environment Assurance Letter for Surface Transport

DATE: 1 May 2011

1.0 Introduction

This Letter documents the status of the Health, Safety and Environmental Management Systems (HSEMSs) for Surface Transport at 31 March 2011.

2.0 Status of Health Safety and Environment Management System(s)

2.1 Health Safety and Environment (HSE) Policy

The TfL Group HSE Policy statement, amended August 2006 (last reviewed July 2010), has been adopted by Surface Transport. In order to promote greater local ownership, the policy has been branded to individual business units and authorised at that level. The policy statement has been made available to all staff via the TfL intranet health and safety SharePoint site, notice boards and in health and safety and environmental training.

Status: Implemented in full.

2.2 HSE Management Systems

HSEMS implementation across Surface Transport was completed for all business areas except Congestion Charging and Traffic Enforcement, where work is underway to address this. This implementation status follows extensive work to raise workforce awareness of respective management systems through a range of media including SharePoint, Source, briefing sessions, newsletters and toolbox talks.

In Streets, where the HSEMS has been in place for several years, an annual review was undertaken to ensure the system continues to meet business and TfL Group requirements. This was underpinned by an independent audit by the Royal Society for the Prevention of Accidents, for the health and safety component, as part of a bi annual auditing arrangement. For other business areas where systems were implemented during the year, annual reviews will be prioritised through the HSE objectives setting process.

In support of the implementation of the HSEMSs, reviews based on the checklist produced collaboratively by the Institute of Directors and the Health and Safety Executive were undertaken. Full HSEMS audit programmes for 2011/12 are being drawn up.

Status: Implemented.

2.3 Management Competence

The Surface Transport Organisation and Arrangements (O&A) document was revised to reflect recent organisational changes. The document describes the health, safety and environmental roles and responsibilities of directors, their direct reports, managers and staff. These are further enhanced through HSEMS procedures and local O&A documents (for modes managing significant risks), which outline individual responsibilities.

Improved coordination of health, safety and environment training is helping to meet policy commitments such as the ability to book health and safety courses through Source. Other steps taken to ensure a competent workforce ranges from the delivery of the “Health and Safety for Executives” course and targeted courses for frontline staff.

Those senior managers whose work impact on the environment are engaged and informed through the environmental and HSE governance meetings. Environmental awareness training is provided to relevant teams on a needs basis.

As a British Safety Council (BSC) Registered Centre for the delivery of BSC Levels 1 and 2 in Health and Safety, Surface Transport is now better placed to address workforce training needs being systematically identified. This builds on Surface Transport acting as an assessment centre for the national Qualifications and Credit Framework for Construction Design Management (CDM) accredited by the Open University.

The delivery of training by Surface Transport Health and Safety professionals has resulted in cost effectiveness for TfL. However, better identification of training needs is required across all business areas.

Status: Implemented.

2.4 HSE Objectives / Key Performance Indicators (KPIs)

HSE objectives are set annually and reviewed quarterly at two levels as part of the Operations Directorates’ service delivery planning process and at directorate level. Environmental objectives for relevant business areas have been set for the first time in 2010/11.

Departmental Health and Safety objectives are signed off and monitored at local HSE and/or safety governance meetings. The same process will be followed for environmental objectives.

Buses safety KPIs are reported as part of a periodic strategic report to Surface Transport directors and health and safety KPIs for staff and contractor incidents are reported quarterly to the Safety Health, Environment Assurance Committee (SHEAC) and monitored at the Surface Board meetings.

Surface Transport HSE performance is reported to the Surface Board and SHEAC. Environmental data is submitted against TfL's Environmental KPIs and reported through the annual reporting process.

Bus incident statistics are benchmarked for bus operators and are reviewed by London Buses and bus company directors at a quarterly Bus Operator Forum (Safety Sub Group). The HSE performance indicators are in place as part of the contract management framework for maintenance contractors within Roads Directorate.

Analysis of road casualty data is used in assessing progress against London's Road Safety Plan which supports the national casualty reduction targets. Performance against these targets are monitored locally and published on the TfL website. Work is currently underway to establish new targets for the next ten years.

Status: Implemented.

2.5 Risk Assessments (including impacts from climate change)

Programmes of risk assessments covering activities, premises and fire are in place across Surface Transport and assessments are monitored and reviewed under existing guidelines. A quarterly compilation of assurance activities is also contributing to arrangements helping to reduce Surface Transport risks to ALARP (as low as reasonably practicable).

Where applicable, risk assessment procedures have been revised as part of the implementation of directorate HSEMSs or in keeping with continuous improvement. Risk assessment training continues to allow greater local risk management.

Display Screen Equipment (DSE) assessments are systematically undertaken using a combination of an online training and assessment tool and personal assessment.

Surface Transport has climate change adaptation plans in place for relevant business areas, ie Roads Directorate, Traffic Directorate, Congestion Charging and Traffic Enforcement, Taxi and Private Hire, London River Services, Victoria Coach Station, Bus Engineering, Bus Infrastructure, Bus Operations and Bus Performance. These have fed into the TfL wide climate change adaptation plan and the Active Risk Manager system.

Status: Implemented in full.

2.6 Meetings and Consultations

HSE matters are discussed at the highest levels within the Surface Transport governance structure. Periodic reports are submitted to the Surface Board facilitating informed HSE planning at a strategic level.

Safety Governance Meetings for each directorate provide the opportunity to ensure that H&S assurance and performance are systematically monitored. Separate environmental governance meetings are held for London Buses to reflect the level of environmental assurance required.

Formal Health and Safety Committees are in place across Surface Transport modes/directorates, which meet at set intervals and are attended by management, staff and Trades Union representatives.

To support the safety of the transport network, key meetings are held with strategic contractors the purpose of which includes sharing of best practice and dissemination of TfL's expectations and priorities. Examples of meetings include Bus Operators' Forum (Safety Sub Group), Working Group with representatives of Highways Maintenance Works Contracts (HMWCs) and CDM Working Party.

Meeting minutes will be made available from the recently implemented SharePoint site.

Status: Implemented in full.

2.7 Incident Reporting and Investigation

Surface Transport HSEMS procedures include requirement for reporting and investigation of accidents and incidents to staff and for the reporting and investigation of major incidents as defined by the Group HSEMS.

A bespoke web-based incident system currently used by bus operators, Dial-a-Ride and London Bus Services Ltd is in the process of being extended to all business areas within Surface Transport. This will further enhance incident reporting and analysis capabilities. Incident reporting by bus operating companies forms part of the annual contract compliance audit.

A formal arrangement is in place for reviewing the investigation of major incidents on the bus network with a view to identifying root causes and sharing of lessons learned with all bus operators.

Accident and incident data is monitored at directorate health and safety governance meetings, at Surface Board Meetings and quarterly SHEAC meetings.

Surface Transport has competent accident investigators that meet standards required by the Institute of Industrial Accident Investigators. Further improvement in incident investigation competence will be gained from planned additional training for Health and Safety professionals.

Status: Implemented

2.8 Assuring HSE Performance

Surface Transport strives to meet legal compliance through all of its operations. The focus remains on ensuring that consents are in place for relevant works, waste documentation is in place and that drainage plans and maintenance regimes for TfL-owned and managed premises are up to date.

Assurance of HSE continues to be undertaken across Surface Transport, through a combination of audits by the Surface Safety Team and independently through external professional bodies. Physical condition surveys, planned general inspections and operational inspections are also undertaken.

Each business area reports HSE performance information via scheduled governance meetings. HSE is also reviewed by Surface Transport Directors at the Surface Board Meetings with a report submitted by the Operations Director on a periodic basis and on a quarterly basis to SHEAC by the Managing Director.

Further improvements to audit planning and action tracking are expected following the recent implementation of the Surface Transport HSEMS audit procedure.

Status: Implemented

2.9 Procurement Management

HSE criteria form part of the evaluation criteria for appropriate contracts and the H&S and Environment teams are working with the Contracts and procurement team to ensure that HSE requirements are embedded in all relevant Surface Transport contracts and at all stages of the procurement process.

Health, safety and environmental expertise is provided directly to the project teams for relevant major contracts.

All long term contracts are audited regularly and recommendations are fed back to the contract account managers.

Status: Implemented

2.10 Review of the Management System

An independent audit of the health and safety elements of the Streets HSEMS was undertaken in addition to a review carried out in fulfilment of the Group HSE Assurance Letter process. An environmental aspects and impacts assessment of the new directorate, Better Routes and Places, was undertaken.

The findings from all processes are actioned and monitored through the Streets Chief Operating Officer and Better Routes and Places HSE governance meeting, Directorate management meetings and, where appropriate, the Streets H&S Consultative Committee. Formal processes for the review of environmental elements of the management system have been developed and implemented in co-ordination with the Health and Safety process.

Following the implementation of the HSEMSs for other business units, plans are in place to review the suitability and effectiveness of the HSEMS on an annual basis. This will include setting time bound objectives as part the annual objective setting process.

Status: Implemented

3.0 Future HSEMS Developments

As part of Surface Transport's commitment to continuous improvement to its HSEMSs, the outcomes of audits and other assurance processes will form part of the considerations for future revisions to procedures. This will also be augmented with lessons learned from any major incident investigation, analysis of trends and industry best practice.

MD's SIGNATURE:

DATE.....

Transport for London

LONDON RAIL

SUBJECT: Health, Safety and Environment Assurance Letter for London Rail

DATE: 26 May 2011

1.0 Introduction

This Letter documents the status of the Health, Safety and Environmental Management System for London Rail at the end of March 2011.

London Rail is made up of three separate business areas, Docklands Light Railway (DLR), London Overground and London Tramlink. The transport services themselves are delivered by private sector contractors.

Comments have been made in each section where requirements have not been categorized as implemented in full.

2.0 Status of Health Safety and Environment Management System(s)

2.1 Health Safety and Environment (HSE) Policy

The TfL Group HSE Policy Statement has been adopted and specific Business Area HSE arrangements are aligned with the Group HSE Policy. The TfL Group HSE Policy Statement has been communicated to all employees.

Docklands Light Railway	Implemented in full	London Overground	Implemented in full	London Tramlink	Implemented in full
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London Rail has adopted the TfL Health, Safety and Environmental Policy. The policy is widely available on the TfL Intranet. It is also on display on Health and Safety notice boards throughout our offices.

2.2 HSE Management Systems

HSE Management Systems (HSEMSs) are in place or being developed in accordance with the criteria laid down in the TfL Group HSEMS to cover all business activities.

Docklands Light Railway	Implemented in full	London Overground	Implemented in full	London Tramlink	Implemented
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London Tramlink rolled out a new Integrated Management System in December 2010. The standards and procedures are being reviewed in conjunction with the organisational change which took place in January 2011 when London Tramlink transferred the Infrastructure Maintenance function 'in house'. The key procedures for legislative compliance with The Railways and Other Guided Transport Systems (Safety) Regulations 2006 are implemented.

2.3 Management Competence

Roles which require HSE competence have been identified and the level of HSE competence defined and assessed. Training programmes have been developed where required.

Docklands Light Railway	In place	London Overground	Implemented in full	London Tramlink	In place
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On DLR HSE competence requirements have been identified. An HSE competence management system is being developed for the engineering department. The associated documents are in place and a trial is currently underway. Full roll out in the engineering department is scheduled for the end of May 2011. Other parts of the DLR business already have established competence arrangements in place.

For London Tramlink safety critical and HSE related roles have been identified and staff with appropriate competencies recruited to fill these roles. The Integrated Management System (IMS) competence management framework is under development.

2.4 HSE Objectives / Key Performance Indicators (KPIs)

HSE objectives have been set for the year with KPIs and targets used to monitor performance for the purpose of reporting to senior management.

Docklands Light Railway	Implemented in full	London Overground	Implemented in full	London Tramlink	Implemented in full
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2.5 Risk Assessments (including impacts from climate change)

A programme of risk assessments is in place to ensure all risks are reduced to ALARP (as low as reasonably practicable) through implementation of control measures and ongoing review.

Docklands Light Railway	Implemented	London Overground	Implemented	London Tramlink	Implemented
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Risk assessments are in place in all businesses, however further work is required to fully integrate the impact from climate change which has recently been assessed.

2.6 Meetings and Consultations

A schedule of meetings is in place to review HSE performance and to communicate and consult with employees on HSE issues.

Docklands Light Railway	Implemented in full	London Overground	Implemented in full	London Tramlink	Implemented in full
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2.7 Incident Reporting and Investigation

All incidents are reported and investigated, in line with the HSEMS procedure, to identify root cause and corrective action.

Docklands Light Railway	Implemented in full	London Overground	Implemented in full	London Tramlink	Implemented in full
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2.8 Assuring HSE Performance

An annual HSE audit programme is in place and monitored by management with reports communicated and actioned.

Docklands Light Railway	Implemented in full	London Overground	Implemented	London Tramlink	Implemented in full
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On London Overground the programme of audits for 2010 was not completed, although major suppliers were audited. A programme of audits is in place for 2011.

2.9 Procurement Management

Contractors and suppliers are procured using a process that provides adequate assurance that HSE risks will be appropriately managed.

Docklands Light Railway	Implemented in full	London Overground	Implemented in full	London Tramlink	Implemented in full
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2.10 Review of the Management System

The suitability and effectiveness of the HSEMS is regularly reviewed by senior management and the findings of the review communicated at senior management meetings

Docklands Light Railway	Implemented in full	London Overground	Implemented in full	London Tramlink	Implemented in full
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3.0 Future HSEMS Developments

As part of the ongoing review and development of HSEMS, the following significant improvement actions are scheduled for this year.

Docklands Light Railway

- An assessment of DLR against the Office of Rail Regulations Management Maturity Model
- To develop a simplified MS Excel version of the Network Risk Model

London Overground

- No significant changes are planned. Some minor changes and updates will be made as a result of the recent management review.

London Tramlink

- Completion of the Competency Management Framework
- Completion of the Environmental Compliance Review with Action Plan and targets for Environmental Performance

SignedDate.....

Mike Brown
Rail and Underground Managing Director

Transport for London

CROSSRAIL LIMITED

SUBJECT Health Safety and Environment Assurance Letter for Crossrail

DATE: June 2011

1.0 Introduction

This Letter documents the status of the Health, Safety and Environmental Management Systems (HSEMS) for Crossrail at the end of March 2011.

2.0 Status of Health Safety and Environment Management System(s)

2.1 Health Safety and Environment (HSE) Policy

The TfL Group HSE Policy has been adopted by the Crossrail Board and a supporting project specific HSE policy, aligned with the Group HSE policy, has been agreed by the Executive Committee and communicated to all employees at induction and during HSEMS training. The project specific HSE policy was reviewed in March 2011.

2.2 HSE Management Systems

The Health, Safety and Environmental Management Systems have been reviewed against and are compliant with the TfL policies and procedures. They have also been certified against the standards BS OHSAS 18001 occupational health and safety management systems and ISO 14001 environmental management system by LRQA. The H&S management system was subject to a major review and update prior to the implementation of the new Crossrail organisational structure in April 2011. The Environmental Management System is undergoing a phased update, with all essential procedures updated prior to implementation of the new structure in April 2011 and all other procedures and documents updated in accordance with a planned timetable.

2.3 Management Competence

For Health and Safety, a competence matrix has been developed and agreed by the executive team. Environmental competencies are included in the Crossrail skills matrix. This is being reviewed following the restructure and will be updated as required. A training programme to deliver the requirements of the matrix is ongoing in accordance with business priorities.

2.4 HSE Objectives / Key Performance Indicators (KPIs)

Crossrails 2011/12 health, safety and security objectives were agreed in March 2011. The Crossrail environmental objectives were agreed in September 2010 to run until the end of the financial year. New environmental

objectives for 2011/12 were developed and agreed. The HSE objectives have been checked against the TfL objectives.

Crossrail has developed key HSE performance indicators which monitor the effectiveness of the HSEMSs. The KPIs along with progress on objectives is monitored by the CRL Board, Crossrail Executive team and the HSE Subcommittee.

2.5 Risk Assessments

Risk assessments are in place to ensure all risks are reduced to ALARP (as low as reasonably practicable) through implementation of control measures and ongoing review. Risk assessments were reviewed prior to the implementation of the new organisational structure in April 2011 and updated where necessary.

2.6 Meetings and Consultations

A schedule of meetings is in place for the purpose of reviewing HSE performance and to communicate and consult with employees on HSE issues.

2.7 Incident Reporting and Investigation

Crossrail has in place incident investigation and reporting procedures both of which were updated in March 2011. The details of all incidents along with the investigation findings and corrective actions are logged in the Crossrail Incident management system enabling trends to be identified and Programme wide improvement action to be taken where necessary.

2.8 Assuring HSE Performance

The annual audit programme has been agreed by the Crossrail Board. The plan that has been created is an integrated plan managed by the TfL internal audit team and covers all areas.

2.9 Procurement Management

The Crossrail procurement process ensures that the competence of contractors is fully assessed prior to appointment. The procurement process also ensures that the HSE risks associated with the procurement of services and goods are identified and appropriately managed.

2.10 Review of the Health, Safety and Environment Management System

The suitability of the HSE Management Systems is regularly reviewed by senior management with a formal review of the management systems conducted every six months in accordance with BS OHSAS 18001 and ISO 14001 certification requirements.

3.0 Future Health, Safety and Environment Management System Developments

During the coming year the management systems will be reviewed to confirm that the changes to procedures and processes for the new organisation are continuing to manage business risk and to identify further improvement areas.

Rob Holden
Chief Executive Officer
June 2011

Transport for London

TfL CORPORATE DIRECTORATES

SUBJECT: Health, Safety and Environment Assurance Letter for TfL Corporate Directorates

DATE: April 2011

1.0 Introduction

This Letter documents the status of the Health, Safety and Environmental Management System (HSEMS) for the TfL Corporate Directorates at the end of March 2011. Corporate Directorates comprise Finance, General Counsel, Marketing and Communications and Planning.

Section 2 of the Letter addresses the generic HSE matters common to all Directorates, Section 3 identifies planned improvements to generic HSE matters and Section 4 addresses those HSE matters that are the specific responsibility of individual Directorates.

2.0 Status of Health Safety and Environment Management System(s)

2.1 Health Safety and Environment Policy

The TfL Group Health, Safety and Environment Policy Statement was reviewed in July 2010. It is available on notice boards and via the intranet. The Policy Statement is provided to new employees as part of the Corporate Induction.

Status: Implemented in full

2.2 HSE Management Systems

A suite of standards and procedures that comprise the TfL Corporate Health, Safety and Environment Management System (HSEMS) are in place and implement the Group HSEMS. Existing HSEMS Standards undergo review and new Standards are included as required to address business activities and changes in legislation.

Status: Implemented in full

2.2 Management Competence

A Group HSE Competence Framework was finalised during 2008/09. Corporate Directorates HSE has completed a gap analysis against its requirements to aid the development of a training and information programme for managers. A programme of training (pay bands 3, 4, 5) has been designed and will be implemented during 2011/12.

Status: Under development

2.4 HSE Objectives / Key Performance Indicators (KPIs)

KPIs, including injury rates and sickness absence are monitored and reported through the Business Management Review process and to the Safety Health and Environment Assurance Committee (SHEAC) through quarterly and year end reports.

Status: Implemented in full

2.5 Risk Assessments

A programme of risk assessments, updated annually, addresses workplace and specialist risks. The programme is led and largely executed by Corporate HSE Advisors within Group HSE. Additional specialist risk assessments take place when required. The programme, as implemented and maintained, ensures that health and safety risks are maintained at levels that are As Low As Reasonably Practicable. Risk assessments undergo periodic review and are revisited following significant events in conformance with relevant HSEMS Standards.

Status: Implemented in full

2.6 Meetings and Consultations

Revised consultation arrangements, finalised between Group Employee Relations and Group HSE and ratified at Chief Officer level, have been agreed with recognised trade unions. The consultation arrangements that address the requirements of the Safety Representative and Safety Committees Regulations 1977 and the Health and Safety (Consultation with Employees) Regulations 1996 are being rolled out across Corporate Directorates.

Group Facilities has put in place a structure of meetings across the Head Office portfolio under which building-related HSE performance is a standing agenda item.

Status: Implemented

2.7 Incident Reporting and Investigation

Accidents are recorded in accident books. Additionally, to aid real-time reactive measurement, HSEMS Standards and supporting procedures require electronic accident and incident reporting and investigation.

Status: Implemented in full

2.8 Assuring HSE Performance

During 2007/08, an independent audit of the Corporate Directorates HSEMS was carried out. Group HSE led a programme to implement agreed recommendations which have been completed.

An HSE Assurance Letter is completed annually and provided to the Commissioner and SHEAC.

Status: In place

2.9 Procurement Management

Goods, Works and Services are procured in compliance with TfL Procurement Policy and processes. Compliance with all applicable health and safety legislation is a standard, contractual requirement.

A programme of common contract clauses on environmental issues, with guidelines for their use has been developed.

Appropriate HSE input is delivered at identified stages of the procurement lifecycle in conformance with TfL HSE Procurement Guidelines and the TfL HSE Impact Procurement Process Model.

Status: In place

2.10 Review of the Management System

The Corporate Directorate HSEMS contains a Standard that requires the HSEMS to be reviewed against the requirements of the TfL Group HSEMS and to ensure it continues to meet the needs of the Corporate Directorates.

Group HSE is responsible for ensuring that findings from the review are incorporated into the Corporate Directorate HSEMS. In addition, reviews of elements of the HSEMS are undertaken as necessary to address legislative change, to meet best practice and to improve future HSE performance.

A management review of the Group HSEMS was completed in 2009/10. The review addressed HSE requirements being placed upon Businesses and simplified and clarified the structure of the management system.

Following the review of the Group HSEMS, the Corporate Directorate HSEMS was reviewed and updated.

Status: Implemented in full

3.0 Future HSE MS Developments

Following from the review and updating of the Group HSEMS, during 2010/11, the Corporate Directorates HSEMS will be updated. It will also be updated to address organisational change arising from Project Horizon.

4.0 Corporate Directorate 'Specific' HSE Responsibilities

The Corporate Directorate HSEMS contains requirements relating to the wider HSE responsibilities specific to each Directorate. Sections 4.1, 4.2, 4.3 and 4.4 address these responsibilities for Marketing and Communications Directorate, Finance Directorate, General Counsel and Planning.

4.1 Marketing & Communications Directorate 'Specific' HSE Responsibilities

- a) *Work closely with relevant TfL businesses to ensure HSE matters are appropriately and effectively communicated to internal stakeholders.*

Internal Communications provides 'core internal communications channels', including electronic media, staff notice boards, corporate publications and face-to-face meetings, to ensure that two-way communication on HSE matters with employees is achieved.

Internal Communications also ensures that any HSE-related internal communications, irrespective of channel employed, are appropriate and consistent with TfL's stated aims and values including the principles and values contained within the published Strategic Framework for Internal Communication.

The main responsibility for determining the need for, appropriateness of, and scope of communicating on HSE matters lies with the relevant TfL business.

- b) *Work closely with relevant TfL businesses to ensure HSE matters are appropriately and effectively communicated to external stakeholders.*

In the event of a major incident with health and safety impact, TfL's Government & Stakeholder Relations team coordinates the organisation's accurate and timely response to key external stakeholders including key Ministers, Members of Parliament, Assembly Members, national and London-based business groups, London TravelWatch (the statutory transport users watchdog) and leading organisations in the voluntary sector.

- c) *Deliver travel information to external customers using TfL modes of travel.*

Group Customer Services (GCS) and Group New Media (GNM) provide the lead 'information' interface with external customers using TfL modes of travel. GNM communicates real-time travel information to incorporate any required safety element - electronically, and GCS via contact centres (at Travel Information Contact Centre and Oyster Help Desk via agent response and voice recognition systems) and at strategically-located travel information centres. Information provided can address individual needs of customers enabling them to complete their journeys in a safe, economic and time-efficient manner.

4.2 Finance Directorate 'Specific' HSE Responsibilities

- a) *Incorporate TfL strategic safety, security and environmental targets within the TfL performance score card.*

Progress against CO₂ targets is one of the factors that comprise the TfL senior management reward performance score card. The target is to achieve a 20 per cent reduction in grams of CO₂ per passenger km, by 2017/18 across the Group (from 88g/passenger km in 2005/06 to 70g/passenger km in 2017/18).

Six Mayoral Transport Strategy (MTS) goals incorporating strategic safety, security and environment objectives are contained within the TfL Business Plan 2011/12-2014/15 which also sets out health, safety and environment forecasts to 2014/15.

- b) *Summarise HSE objectives within the TfL business plan.*

HSE Objectives are addressed in the business plan.

- c) *Ensure that HSE issues are taken into account when determining allocation of funds.*

Health, Safety and Environment considerations are addressed, in TfL's project and business planning processes. All projects are evaluated for value for money and assessed for all relevant outputs and impacts (including HSE) at the initial feasibility stage, and then subsequently updated at each of the key stages of the project life-cycle.

Any risks identified are mitigated or addressed, and funds are allocated appropriately within a financially balanced Business Plan.

Pan-TfL HSE matters are managed by the General Counsel Directorate and form part of their business planning submission.

- d) *Policy and process to address employee HSE competency at the recruitment stage and record competency requirements.*

Induction is an established requirement for new starters in the Corporate Directorates. Guides for new employees and for employing managers, posted within the Learning and Development section of the intranet, address occupational safety and health issues for employees and those managers with employment responsibilities. A process is in place to record competencies and other qualifications in SAP via the Qualifications Catalogue.

- e) *Appropriate employee communications and consultation arrangements are in place in accordance with legal and HSEMS requirements.*

HSE consultation arrangements that meet the requirements of the Corporate Directorates will be adjusted to address organisational change arising from Project Horizon.

- f) *Group Property and Facilities policies and procedures address HSE issues, providing safe working environments.*

Specific areas addressed include:

- Safe plant and machinery
- Building-specific HSE information for employees including emergency plans
- Cooperation and coordination on HSE matters at multi-occupancy sites.

Group Property and Facilities (GPF) has policies and procedures to support existing Standards within the Corporate Directorates HSE Management System and to address GPF-specific issues not covered within the existing suite of HSE Management System Standards.

GPF has environmental management processes and procedures in place that cover the requirements of the International Standards Organisation (ISO) 14001 Environmental Management Standard and have been externally accredited by the Carbon Trust to achieve the Carbon Trust Standard. GPF is looking into the requirements for meeting the ISO 16001 Energy Management Standard. The Corporate Directorates HSEMS will be reviewed to ensure the correct links are in place with the GPF documentation.

- g) *HSE risks are minimised and HSE benefits are maximised through the procurement process.*

TfL Procurement is aligned to a consistent set of Standing Orders, procurement policy and processes. Procurement standards and procedures are applied to meet business-specific needs. Group HSE and Group Procurement guidance addressing HSE risk processes at key stages over the procurement cycle is in place.

Steve Allen
Managing Director, Finance

4.3 General Counsel Directorate 'Specific' HSE Responsibilities

- a) *Support the development of HSE policy and strategy.*

The Group TfL HSE Management System Policy Statement was reviewed in 2010/11.

Group HSE continued to lead work to ensure that the agreed HSE Competency Framework is applied across TfL.

- b) *Maintain a process for providing assurance to the TfL Board.*

The primary means of assurance to the Board is through the Safety Health and Environment Assurance Committee (SHEAC) that addresses TfL HSE performance on behalf of the Board. Group HSE delivers Quarterly and Annual aligned modal HSEMS reports to SHEAC detailing incident trends, audit activity, sickness absence and HSEMS status updates.

An HSE Assurance Letters process has been implemented across TfL.

c) Keep up to date with new and changing HSE legislation.

General Counsel maintains and chairs the Consultations Response Group (CRG) which Group HSE attends. The role of the CRG is to co-ordinate TfL responses to consultations on proposed legislative change and facilitates a TfL response.

General Counsel monitors changes in relevant HSE legislation and case law and provides advice and training as appropriate. It also maintains a register of environmental legislation as recommended under EMS Standard ISO14001.

d) Assess compliance with HSE legislation.

TfL's legal compliance is monitored through a legal compliance report which is prepared on a bi-annual basis for the Audit Committee. The report is compiled by General Counsel based on responses to a Questionnaire completed by the TfL directorates. In addition, TfL directorates undertake a process of Controlled Self Assurance (CSA) whereby Managing Directors are asked to sign a Declaration assuring compliance with legal risk management processes. The CSA documentation is completed once each year.

With regard to any alleged breach of Health and Safety legislation, TfL directorates provide details of any formal warning or notice from the Health and Safety Executive or other regulatory bodies. For any incident, the directorate provides details on the nature of the alleged breach, how it came to its attention, the action taken to investigate, remedial steps and action taken to prevent further incidents. This section of the Legal Compliance Report is reported to SHEAC.

e) Maintain HSE legal support.

TfL Legal provides HSE legal support and training as required.

f) Communicate TfL HSE strategic objectives using the Business Planning Guidelines.

Strategic TfL objectives for HSE are agreed with the operating businesses and set in the TfL Business Plan. If necessary, these may be amended or extended during the year on a reactive basis. Strategic objectives are reported to SHEAC.

g) Collate information on the progress against environmental objectives for reporting to SHEAC.

Quarterly updates on HSE matters are provided to SHEAC and an annual TfL Health and Safety Report and an annual TfL Environmental Report are prepared and published by Group HSE.

Howard Carter
Managing Director, General Counsel

4.4 Group Planning 'Specific' HSE Responsibilities

- a) *Ensure that transport related HSE matters are addressed in relation to Mayoral Strategies and projects that Planning lead on.*

Planning consult appropriately on HSE matters in relation to Mayoral Strategies and projects that they lead on.

- b) *Develop an assessment framework that enables schemes to be more comprehensively assessed in relation to all MTS goals and objectives including HSE.*

Michèle Dix
Managing Director, Planning Directorate