

Safety, Accessibility and Sustainability Panel

Date: 15 October 2014



Item 3: Annual Health, Safety and Environment and Resilience Assurance Letters

This paper will be considered in public

1 Purpose

- 1.1. This report provides the Panel with TfL's Annual Health, Safety and Environment and Resilience Assurance Letters 2013/14.

2 Recommendation

- 2.1 **The Panel is asked to note the paper and the Assurance Letters.**

3 Background

- 3.1 The Assurance Letter process has now operated in TfL for 7 years. It is the documentary evidence of a self-assurance process. Each Operating Business and the Specialist Services Directorates reviews its performance to assure itself at Chief Officer Level that it is complying with a number of defined assurance statements. It is these explanations and overall markings that form the assurance letters.
- 3.2 The Assurance Letters as a whole describe a system that is increasingly mature, but which has clear areas for development. These are set out in the descriptions from each part of the business.

List of appendices to this report:

Appendix 1: London Underground and London Rail
Appendix 2: Surface Transport
Appendix 3: Crossrail
Appendix 4: Specialist Services Directorates

List of Background Papers:

None

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London Underground and London Rail

1.0 Introduction

This Assurance Letter documents the status of the Health, Safety and Environment and Resilience processes across London Underground (LU) and London Rail (LR).

2.1 Health, Safety and Environment (HSE) and Resilience Policies

Assurance Statement: The TfL HSE Policy Statement has been adopted and specific Business Area arrangements are aligned to the policy. The Business Area complies with the TfL Resilience Policy Management Framework and has a clear policy on resilience arrangements, with arrangements aligned. Both policies are communicated to all employees.

Description: LU and LR have adopted a Health, Safety and Environmental (HSE) Policy that mirrors the TfL HSE Policy. This policy was endorsed by the LU Board and came into effect in January 2007 and was subject to review. The LU and LR policy was completely redrafted and re-issued in a style which is more engaging to employees in February 2014.

The policy is available on the LU intranet, for Docklands Light Railway employees it is on the DLR intranet, For other Rail employees it is found on TfL's intranet "Source". It is contained within the Safety Certification and Authorisation documentation required by the Railways and Other Guided Transportation Systems (Safety) Regulations (ROGS). It is on display on notice boards in all LU stations, depots, offices and other premises. It is also on display at all LR premises.

LU and LR's resilience processes and procedures have been developed to comply with relevant LU/LR and TfL procedures and policies, which in themselves discharge compliance with legal requirements imposed by regulatory bodies.

HSE Status: **Implemented**

Resilience Status: **Implemented**

Development Activities:

LU and LR's resilience processes and procedures are fully implemented; however, with organisation change programmes underway these will be reviewed and will be refreshed as required.

2.2 Legal Compliance

Assurance Statement: The specific Business Area will have a clear understanding of the extent of the legal requirements with respect to Health and Safety and Environmental protection, as well as the Civil Contingencies and Crime and Disorder requirements, and will understand the level of compliance with those requirements.

Description: The LU and LR Health, Safety and Environment Management Systems (HSEMS) were developed to meet health, safety and environmental legal requirements. The HSEMS is subject to review on a yearly cycle to ensure it continues to meet legislative and business requirements. During 2013/14 the HSEMS for LR, LU as well as Surface Transport were integrated, with requirements made common where sensible to do so, but remaining different where required.

The elements of the HSEMS relevant to the operation and maintenance of LU are described in the London Underground Safety Certificate and Authorisation. The Certificate and Authorisation are accepted by the Office of Rail Regulation (ORR). In 2012, the Safety Certificate and Authorisation were updated, re-submitted to the ORR and accepted. Docklands Light Railway's Safety Authorisation was submitted and accepted in 2013/14. The London Overground Safety Certificate was revised and was submitted to the ORR for acceptance in July 2014.

The Safety Management Systems of London Underground and London Rail are subject to internal audit by the TfL Internal Audit team. The ORR also undertakes planned audits of elements of the system.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities:

During 2013 /14 Rail and Underground undertook an assessment of the maturity of the Health and Safety Management System using the Office of Rail Regulation's Rail Management Maturity Model. The results indicate that Rail and Underground have a compliant approach to health and safety management. Improvement actions identified from this assessment are included in the Safety Improvement Plans for both Rail and Underground. During 2014/15 The Safety Certificate and Authorisation for London Underground will be updated to reflect recent organisational changes.

2.3 HSE and Resilience Management Systems

Assurance Statement: The Management System within each Business area will cover HSE and Resilience areas. These will be written down and those with roles and responsibilities within them will be identified. The importance of complying with the management system will be understood at all levels.

Description: A comprehensive Health, Safety and Environmental Management System has been developed for all business areas of Transport for London (including Rail and Underground). The HSEMS describes the standards, processes and activities which are undertaken to ensure the health and safety of customers, public, employees and suppliers and to ensure environmental protection. Documents and instructions are available in a “one stop shop” on the LU intranet. DLR employees access this through their intranet DORIS and other LR employees TfL’s Intranet ‘Source’. The information is produced in a style accessible to the end user. Change to the information in the Management System is subject to effective control.

LU’s and LR’s resilience processes and procedures have been developed to comply with relevant LU and TfL procedures and policies, setting out the roles, responsibilities and obligations of the relevant post holders within the business. These have been tested in real life circumstances on a regular basis and have been found to be effective. These processes and procedures are embedded through training and competency management systems that are maintained locally and periodically audited. They are also communicated and conveyed through staff briefings.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities:

LU and LR has a commitment to continuous improvement in health, safety and environmental management and performance. This means that they regularly consider 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 Rail and Underground Board and progress is monitored and reviewed throughout the year.

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

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

- Delivery of actions identified from a review of Rail and Underground’s Safety Management Maturity against the ORR’s Rail Management Maturity Model.
- Assessing and, if necessary, enhancing the risk assessment processes.
- Developing an enhanced strategy for improving safety for customers on the London Underground network.
- Refreshing the strategy for managing health, safety and environmental performance on capital programmes.

2.4 Management Competence

Assurance Statement: The levels of competence have been identified for all roles and there are procedures in place to develop and assess individuals with defined responsibilities. Development programmes will exist for new and existing staff.

Description:

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 and LR's Safety Certification and Authorisation documents.

For front line employees a comprehensive Competence Management System is in place. This ensures the continuing competence of those delivering LU's services. LR's concessionaires and franchisees have similar arrangements.

LU and LR have established and implemented a range of internal health, safety and environment training courses for junior, middle and senior managers/directors. The emphasis in these courses is on those managers whose roles have the greatest impact on HSE risk in the LU operational environment. These training interventions are supplemented by coaching sessions from the HSE team.

In addition to ensuring the competence of its employees, LR also requires that its franchisees and concessionaires have a developed competence management system that is subject to review.

Competency in terms of resilience is determined through structured formal training and experience (that allows staff to be licensed to be able to carry out specific tasks and accountabilities) that is formally recorded on competency management systems that are maintained locally and periodically audited in both LU and LR.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities: As part of the 2014/15 Safety Improvement Plan there is an action arising from the management system maturity assessment to review, and as necessary improve, health and safety training provision across LU and LR. The aim is to ensure that at all levels of the organization employees are equipped to provide the safest possible service to customers.

2.5 Objectives / Key Performance Indicators (KPI's)

Assurance Statement: Objectives, Targets and KPIs have been set for the year. These are used to monitor HSE and resilience performance and this is reported back to senior management.

Description: Each year LU and LR delivers comprehensive improvement plans in respect of health, safety and environment. The plans are refreshed on an annual basis. The 2014/15 safety improvement plan was endorsed by the Rail and Underground Board in March 2014 and is delivered under the governance of the Health, Safety and Environment Improvement Plan Programme Board. Progress of the plan against milestones is reported to the Rail and Underground Board as part of the overall 'Rail and Underground Plan.' This makes the status of actions highly visible and the subject of on-going monitoring and review. Key activities in 2014 /15 are listed under section 2.3 of this Assurance Letter. Those accountable for delivery of key actions in the improvement plans have personal objectives which are reviewed as part of the annual Performance and Development cycle.

LU and LR have 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. These address both system safety and outcome events. Performance is reported regularly by a number of means at local and higher levels within LU and LR. A comprehensive health, safety and environmental performance report is published every quarter which covers LU and LR. Each LR business has its own safety index covering pro-active and lagging measures. The report is subject to detailed review by the Rail and Underground Board.

LU and LR's resilience processes and procedures have been aligned to the LU/LR Performance Scorecard that is cascaded with increasing granularity and specificity to the respective post / accountability within the business. Scorecard performance is reviewed periodically and at half-year and end-of-year reviews with line management.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: During 2014 /15 a review will be undertaken of the process for setting and reviewing HSE targets to ensure they adequately consider longer term trends and lead to longer term improvements.

2.6 Risk Assessments

Assurance Statement: A programme of risk assessment is in place to ensure all risks are reduced to ALARP (as low as reasonably practicable) through implementation of control measures and on-going review.

Description: LU and LR have established comprehensive arrangements for the assessment of HSE risk in respect of customers, employees and others affected by their operations. The measures identified through risk assessment to mitigate risk, so far as is reasonably practicable, are implemented and subject to risk based audit, inspection and review. These arrangements are part of the LU and LR Health, Safety and Environment Management Systems.

LU and LR standards require that risk assessments are subject to thorough review periodically, at times of change and following significant events, as appropriate. Where practicable these adopt a consistent approach. In this way health, safety and environmental risks are maintained at levels that are as low as reasonably practicable.

LU and LR's means of managing their significant business risks is via the established risk management systems that are recorded and tracked on prescribed business management tools (e.g. Active Risk Manager (ARM)). These are periodically reviewed. Additionally, there are some specific risk management systems that are bespoke to their application (for example, in relation to security and major environmental threats – e.g. flooding).

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: As part of the Safety Improvement programme for 2014/15 noted in section 2.3 of this letter, and as part of the Rail and Underground Plan a review will be made of the way in which risk assessment is undertaken to ensure it remains fully effective and reflects best practice.

2.7 Operational business planning

Assurance Statement: The day to day operational and project delivery needs to ensure that HSE and Resilience is included in all that is undertaken.

Description: The activities required to ensure the health and safety of customers and employees and that the environment is not adversely impacted is detailed in the LU Management System. In particular, the LU Rule Books, Manager's Handbooks, and Maintenance Work Instructions ensure health and safety in delivery of customer service and environmental protection.

The TfL Project Management methodology, Pathway, prescribes the steps required to ensure effective management of health, safety and the environment in project delivery across LU and LR.

LU and LR's resilience processes and procedures have been developed to comply with relevant LU and TfL procedures, policies and engineering and operational standards (that in themselves discharge LU and LR's

compliance with the expressed legal requirements placed on it by the various regulatory and resilience bodies). These processes are subject to periodic audit, testing and peer review.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: Pathway was introduced in January 2013 and in 2014/15 support will be given for user led continual improvement of the methodology.

2.8 Change management

Assurance Statement: Changes may have HSE and Resilience risks associated. So changes will only be made when these risks are clearly understood, analysed, assessed, been through the appropriate consultation process and where there is proper control plans in place and monitored.

Description: All change proposals with the potential to significantly affect health, safety or the environment across London Underground are subject to scrutiny, consultation and require approval before implementation by The Directors Risk and Assurance Change Control Team (DRACCT). DRACCT has delegated authority to act in this capacity from the Rail and Underground Board. On a risk basis, Change Assurance Plans are developed and subject to DRACCT approval, to ensure that all aspects of change are considered – including health, safety and environmental impacts. On a risk basis, Verification Activity Plans are also developed to provide assurance that the measures necessary for effective implementation of change (including health, safety and environment outcomes) are implemented. LR also operates clear change control processes within each of the businesses, operating in a similar way to LU's; in each business the Concessionaires and Franchisees are part of this process.

LU and LR's resilience processes and procedures have been developed to discharge LU and LR's obligations under legal requirements placed by the various regulatory and resilience bodies. Change management is controlled via a highly prescriptive change management process that includes peer review and internal and external review and consultation, prior to final acceptance and sign-off by mandated committees. All change proposals with the potential to affect employee safety are consulted on with the relevant Trades Unions.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: No specific actions are planned for 2014/15.

2.9 Procurement Management

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

Description: LU and LR have implemented procurement standards and processes that ensure all suppliers meet LU and LR's HSE requirements at all stages of procurement and delivery. There are robust contractual provisions relating to health, safety and environmental management.

Verification of higher risk activities by suppliers is managed through LU and LR's assurance processes, on site monitoring and performance reporting.

LU and LR's resilience processes and procedures have been developed to comply with relevant LU and TfL procedures, policies and procurement and commercial management standards.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities: In 2014 / 15 HSE targets are to be included in contracts with suppliers.

2.10 Meetings and Communication

Assurance Statement: A schedule of meetings is in place for the purpose of reviewing HSE and Resilience performance and this is backed up with communications with employees on HSE and resilience issues.

Description: Each period the Rail and Underground Board reviews progress with the safety improvement actions detailed in the Rail and Underground Plan. Each period there is also a formal review of health and safety performance against targets at different management levels. Remedial actions where required are also monitored.

Larger scale health and safety improvement actions are governed by the HSE Improvement Programme Board which is part of the Reliability, Availability, Maintainability and Safety Programme – itself part of the Rail and Underground Plan.

A comprehensive quarterly health, safety and environment performance report is prepared and reviewed by the Rail and Underground Board each quarter. Key extracts from the report are also reviewed by the independent Safety Accessibility and Sustainability Panel as part of TfL's wider governance arrangements.

The Rail and Underground Board is supported in its safety role by the LU Directors' Risk and Assurance Change Control Team (DRACCT) which provides an effective peer review function. Each of the LR businesses has its own Change Boards fulfilling similar functions.

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

In respect of employee involvement and consultation, LU has established and implemented a health and safety consultation framework at three levels that facilitate 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.

The TfL Resilience Steering Team is the Director level group overseeing resilience issues. It meets on a quarterly basis. This group is actively supported by LU and LR. The TfL Resilience Gold Group meets monthly and is also fully supported by LU and LR. This Group ensures communication of resilience matters across LU and LR.

HSE Status: **Implemented**

Resilience Status: **Implemented**

Development Activities: No specific actions are proposed for 2014/15.

2.11 Incident Reporting and Investigation

Assurance Statement: All incidents are reported and investigated in line with defined procedures to identify root causes and learn lessons and where needed to take corrective actions.

Description: Through the implementation of the LU Health, Safety, Environment Management System, 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.

All incidents on LU and LR are recorded and analysed for root causes and trends. Actions are developed and implemented to reduce these risks further. Actions are tracked to closure. LU has dedicated incident investigation capability to investigate significant incidents. The investigator can also call on a number of safety managers/advisers and engineers trained in specialist investigation techniques. All Formal Investigation Reports issued are subject to peer review by the LU DRACCT and actions tracked to closure. Incidents with less significant outcomes are investigated locally by line management and actions tracked via four weekly management meetings.

In LR most investigations are conducted by the Concessionaires and Franchisees and are then subject to peer review by LR personnel. Where LR undertakes the investigations these are undertaken by trained investigators who look for root causes reviews. Actions are tracked within the local businesses.

HSE Status: **Implemented**

Resilience Status: **Implemented**

Development Activities: During 2014/15 LU and LR will implement a new action tracking database to strengthen and give greater visibility of close out rates.

2.12 Emergency and Recovery planning

Assurance Statement: The procedures in place for contingency and emergency planning and service recovery are clearly set out, reviewed in the light of real incidents and are tested and subjected to continual improvement.

Description: A comprehensive system for managing emergencies and ensuring service and business recovery are in place as part of the LU and LR Management System. For the operational railway this includes emergency plans for incidents at line and network level which cover incidents involving stations, trains and infrastructure. There are also subject specific plans, for example, extreme weather, degraded train service and line incidents. There are also local congestion and emergency plans, which cover specific locations, for example stations, service control centres and depots.

Rules dealing with operational emergency and incidents are documented in the LU Rule Books and the equivalent for the LR businesses.

All LU and LR's Business units have business continuity plans which are integrated with business continuity plans across other parts of TfL. These are tested.

LU and LR's resilience processes and procedures have been developed to ensure that contingency, emergency and service recovery plans are in place and tested at regular intervals. Direct operational feedback through means such as the incident hot debriefs and more formally via the Electronic Incident Report Forms and Formal Incident Investigations ensure operational experience is captured and procedures and operating instructions amended and changes promulgated through the business. Changes are implemented through controlled change management processes.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: During 2014/15 a thorough review is being undertaken into Business Continuity to ensure arrangements are fully robust. This may lead to some further improvements.

2.13 Testing and Exercising

Assurance Statement: There are programmes in place to regularly test and exercise plans and processes to ensure they are fit for purpose and that staff development is in place and delivered to ensure the plans and processes can be executed.

Description: All emergency plans detailed in section 2.12 of this letter are integrated and mutually support one another. All plans are subject to testing and review on a regular cycle. Feedback from testing exercises results in improvements to the plans, as appropriate. The roles and

responsibilities for testing plans are detailed in the Management System and where appropriate in job descriptions.

LU and LR's resilience processes and procedures have been developed to comply with relevant LU and TfL procedures, policies and that overlay prescribed operational procedures that ensure that contingency, emergency and service recovery plans are in place and tested and staff exercised in their deployment at regular intervals – this is often aligned to individual's competency and licensing. Testing and exercising of such procedures is aligned to a defined programme of desk-top and actual staged scenarios and system tests across all operational disciplines across the railway.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities: No specific actions are proposed for 2014/15.

2.14 Assuring Performance

Assurance Statement: Performance is assured through a programme of monitoring, reviewing the outcomes of incident investigations and audits. An annual programme is in place to collate this and provide an overall and consolidated picture to senior management.

Description: Audit across TfL, including LU and LR, are undertaken by TfL Internal Audit. There is a dedicated HSE and Technical Audit team within Internal Audit who develop and deliver a risk based audit programme covering TfL, including LU and LR. The audit programme is developed with key stakeholders in LU and LR including the Head of Engineering, Chief Operating Officer and the Director of Health, Safety and Environment. The schedule of audits is an integral part of the wider TfL Assurance Plan which is agreed with the Rail and Underground Board.

Progress against the programme is monitored regularly and reported to senior LU and LR HSE managers. It is also reported to the Safety, Accessibility and Sustainability Panel quarterly.

Audit results and actions are reported in specific audit reports and actions tracked to completion. Directors and senior management have weekly visibility of outstanding actions. Significant audit findings are also reported in the quarterly LU Health, Safety and Environmental Performance report and where changes are required to the management system these are reviewed by DRACCT. Audit reports are communicated to the audit client and to those with actions as well as 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 by Internal Audit, a programme of HSE Planned General Inspections, System Checks and Safety Tours is carried out across LU and LR as part of local management assurance checks.

LU and LR's resilience processes and procedures have been developed to ensure that incident investigations and the recommendations that arise are logged and progress to close-out is tracked. Those same LU and LR procedures prescribe the required assurance processes around this process.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities: TfL Internal Audit took over responsibility for delivery of HSE and Technical Audit in 2012 from London Underground. The processes for delivering HSE and Technical Audits are being reviewed in 2014 to increase their efficiency and ensure that audit delivers best information on how to strengthen health, safety and environment performance across TfL.

2.15 Review of the Management System

Assurance Statement: Scheduled management reviews of the HSE and Resilience management systems are conducted and where gaps or shortfalls are identified, necessary improvements are put in place.

Description: LU and LR have incorporated the review of its Health, Safety and Environment Management System into the annual review of the adequacy and effectiveness of the overall management system and related arrangements. In between formal reviews, individual elements of the system are subject to review in response to legislative changes or other events. Such changes in LU are controlled through the DRACCT change control process.

LU and LR's resilience processes and procedures have been developed to ensure that there are regular reviews and updates of all relevant procedures. Through the debriefs and formal investigation processes that are set out above, any improvements or short-falls discovered in light of audits completed, operational experience or process testing are captured and changes implemented following peer reviews and the necessary consultation.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities: The development of the TfL Company Management System will continue throughout 2014/15. As part of the Health Safety and Environment Improvement Programme noted in Section 2.3 a thorough base line review of all HSE management processes will be commenced.

Mike Brown MVO, Managing Director of London Underground and London Rail.

18 September 2014.

Surface Transport

1.0 Introduction

This Letter documents the status of the Health, Safety and Environmental Management Systems (HSEMS) and business resilience for Surface Transport at the end of March 2014.

2.1 Health, Safety and Environment (HS&E) and Resilience Policies

Assurance Statement: The TfL HS&E Policy Statement has been adopted and specific business area arrangements are aligned to the policy. The business area complies with the TfL Resilience Policy Management Framework and has a clear policy on resilience arrangements, with arrangements aligned. Both policies are communicated to all employees.

Description: Surface Transport has a dedicated HS & E Policy Statement that is endorsed by the Managing Director, and is displayed and made available to all staff appropriately throughout the organisation. The Policy Statement is aligned with other business area HS & E policies.

The TfL Resilience Policy Framework has been actively communicated to staff with a need to know and is available to all employees on Source, the TfL Intranet.

H & S Status: Implemented
Resilience Status: Implemented
Environment Status: Implemented

Development Activities: To ensure greater local ownership and implementation of the policy at operational level an environmental training programme will be rolled out across Surface Transport focusing on roles and responsibilities in relation to environmental issues.

2.2 Legal Compliance

Assurance Statement: The specific business area will have a clear understanding of the extent of the legal requirements with respect to Health and Safety and Environmental protection, as well as the Civil Contingencies and Crime and Disorder requirements, and will understand the level of compliance with those requirements.

Description: There is a robust framework for systematically assessing and evaluating our compliance with legal H & S requirements, and a process for ensuring that new and proposed changes to H & S legislation are considered and evaluated for their impact prior to implementation.

TfL is a category two responder under the Civil Contingencies Act 2004 and delivers its obligations under the act to co-operate and share information through its representation at the London Resilience Forum (LRF) and a number of its Task and Finish Working Groups as well as liaising (LRF) with other category one and two organisations across London through TfL chairing the Transport Sector Panel of the LRF.

For each business area staff whose roles may result in an impact on the environment are made aware of the need to protect the environment through the management systems and training. Surface Transport has effective processes in place to identify likely environmental impacts. Regular environmental audits are also carried out to ensure compliance with legislation. Assurance is provided through sign-off by Environmental Managers.

H & S Status: Implemented
Resilience Status: Implemented
Environment Status: Implemented

Development Activities: Surface Transport will continue to work with the London Resilience Team to identify resources required of TfL early in the business planning cycle to ensure that TfL fully supports pan London resilience activities.

Through an environmental training programme all relevant staff will be made aware of pertinent environmental legal requirements. Similarly, legal compliance will be ensured through regular environmental audits.

2.3 HS & E and Resilience Management Systems

Assurance Statement: The Management System within each business area will cover HSE and resilience areas. These will be written down and those with roles and responsibilities within them will be identified. The importance of complying with the management system will be understood at all levels.

Description: The TfL-wide One Management System outlines generic responsibilities for employees, managers, senior managers and chief officers, and this is readily available for all staff to access via the TfL Intranet.

Resilience and business continuity plans exist and are reviewed and updated on a regular basis.

Business continuity and resilience planning are coordinated centrally with the Surface Resilience Management Group (SRMG) overseeing the activities across the organisation. The group provides regular updates to the Surface Transport Board.

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|-----------------------------------|--------------------|
| <u>H & S Status:</u> | In place |
| <u>Resilience Status:</u> | Implemented |
| <u>Environment Status:</u> | Implemented |

Development Activities: Specific safety related roles and functions that require more detail are being addressed by Surface specific material that will supplement the generic management system material. This is being communicated at local level to all parties as appropriate.

The proposed environmental training programme has various modules which are in line with the HSEMS procedures. This will ensure that all relevant staff understand the requirements of the management system and their environmental roles and responsibilities.

2.4 Management Competence

Assurance Statement: The levels of competence have been identified for all roles and there are procedures in place to develop and assess individuals with defined responsibilities. Development programmes will exist for new and existing staff.

Description: A safety training needs analysis (TNA) is undertaken annually, that identifies statutory and desirable safety training needs for all staff within all business areas. Training delivery plans are in place that track competency levels against the TNAs, and these are tracked via business level safety governance meetings.

Surface Transport is a British Safety Council (BSC) Registered Centre for the delivery of BSC Levels 1 and 2 in Health and Safety and is acting as an assessment centre for the national QCF qualification for Construction Design Management (CDM) accredited by the Open University. These arrangements are helping to simplify the processes for identifying training needs and fulfilling them cost effectively.

The Surface Transport Resilience Team are suitably qualified and experienced to deliver strategy, develop policy and processes and in training and assessment through exercises, drills and tests on resilience matters to TfL staff and contractors. There is a programme of training and exercises in place with progress and identified lessons being reported through the SRMG.

There is a lack of coordinated approach to identify environmental training needs for operational level staff. Most staff rely on support from Surface Transport Strategy & Outcome Planning Team to ensure environmental compliance.

H & S Status: **Implemented**
Resilience Status: **Implemented**
Environment Status: **Partially Implemented**

Development Activities: Surface Transport is confident it has made necessary arrangements to ensure the competence of its workforce. However, this will be kept under review as part its commitment to continuous improvement.

Similarly, the Resilience Team is working to strengthen its links with managers to ensure relevant resilience professionals are involved earlier in key business activities, particularly in cross cutting activities. This will further ensure the timeliness of advice on contingency planning, physical, personal and personnel security matters and business continuity processes and plans.

Through the proposed environmental training programme all relevant staff will be made aware of their environmental roles and responsibilities.

2.5 Objectives / Key Performance Indicators (KPI's)

Assurance Statement: Objectives, Targets and KPIs have been set for the year. These are used to monitor HSE and resilience performance and this is reported back to senior management.

Description: Surface Transport has established and embedded ten principle strategic outcomes which include commitments to reduce casualties; achieve safer networks for cycling and walking; reduce crime and improve the environment. Business areas consider these outcomes in setting their H&S objectives for the year which in turn are used to create the Surface H&S Improvement Plan. Additionally, specific objectives are set through strategic plans in areas such as road safety, cyclist safety and crime and disorder.

The Surface Scorecard contains specific safety metrics in areas of road safety and crime reduction. HS&E KPIs for staff and contractor incidents and environmental performance is monitored quarterly at the Surface Board. Specific safety KPIs for London Buses are monitored as part of a periodic strategic report to the Surface Transport Board.

HS&E performance indicators are in place as part of the contract management framework for maintenance contractors within Roads

Directorate. 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).

Analysis of road casualty data is used in assessing progress against London's road safety plan (Safe Streets for London) which supports the national casualty reduction objectives. Factsheets on road casualties are published on the TfL website.

Performance against H&S targets and objectives are monitored at business level. Environmental objectives are developed each year for relevant business units. Resilience objectives are set via the Surface Resilience Management Group and are monitored by this group monthly.

The Surface Scorecard contains specific metrics for air quality improvement. Environmental KPIs are monitored at TfL level. Environmental KPIs are reported and monitored for environmental performance quarterly at the relevant environmental governance meeting of the concerned business areas. Environmental objectives are developed each year for relevant business areas.

H & S Status: Implemented
Environment Status: Implemented

Development Activities: Safety specific scorecards are being introduced at Surface and Directorate level, that will facilitate better safety performance scrutiny, inform the wider business scorecard and enable improved safety management planning. These scorecards will be monitored and reviewed at the appropriate safety governance meetings.

2.6 Risk Assessments

Assurance Statement: A programme of risk assessment is in place to ensure all risks are reduced to ALARP (as low as reasonably practicable) through implementation of control measures and on-going review.

Description: Surface Transport developed a H&S risk and hazard profiling process which enables a clear categorisation of risks and hazards being controlled across the diverse operational areas of the organisation.

Programmes of risk assessments covering operational activities, premises and fire are in place across Surface Transport. Risk assessment training continues to allow greater local risk management.

Active Risk Manager (ARM) is used across Surface Transport for business risk management and governance. Key areas such as Display Screen

Equipment (DSE), New and Expectant Mother and Young Person assessments are systematically undertaken centrally.

Contingency and emergency plans are driven by major and significant risks identified on the ARM software. The Resilience Team monitors low probability/high consequence risks and ensure that contingency and emergency plans are in place. The team participates in the review of the London Resilience Forum regional risk register and Borough Resilience Forum Community risk registers at the invitation of borough council resilience teams.

High level environment risks are identified in the Aspects and Impacts Register of the management system. Project and operational risks are identified via environmental impact assessments and site audits.

H & S Status: Implemented
Resilience Status: In place
Environment Status: Implemented

Development Activities: Safety specific risk registers (using the ARM tool) are being created that will bring all safety risks together onto one document, facilitating better business planning and review arrangements.

The Surface Transport resilience team is working with the key risk representative to review major and significant resilience related risks and their mitigations to drive continual improvement.

2.7 Operational business planning

Assurance Statement: The day to day operational and project delivery needs to ensure that HS & E and resilience is included in all that is undertaken.

Description: Day to day operational activities in relation to H&S and environmental management are guided by management system material and requirements. Risk assessment, safety tours, planned general inspections and surveys are carried out as part of an assurance process.

A dedicated team of safety professionals support project delivery as set out in the Construction (Design and Management) Regulations 2007.

Environmental audits are carried out as part of an assurance process.

Processes are in place to identify likely environmental impacts and risks.

H & S Status: In place
Environment Status: In place

Development Activities: Surface specific management system material that outlines specific requirements relating to business areas and activities is being introduced, which will supplement the generic Company Management System requirements.

Processes are in place to identify likely environmental impacts and risks.

2.8 Change management

Assurance Statement: Changes may have HSE and resilience risks associated. So changes will only be made when these risks are clearly understood, analysed, assessed, and have been through the appropriate consultation process and where there is proper control plans in place and monitored.

Description: Change management and control is undertaken in line with business process management. A new change management process was recently introduced across the business that details and provides guidance on effective control of safety risks associated with business change.

H & S Status: In place
Resilience Status: Under development
Environment Status: Under development

Development Activities: Further develop and promote the available tools (such as management system procedures and Pathway project management tool) for use across all business areas.

A template with business topics covering environmental matters needs to be developed to ensure that these areas are considered within change management programmes.

2.9 Procurement Management

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

Description: Contractors are engaged via the use of an “approved contractor list”. H&S expertise is provided directly to the Commercial Procurement function for relevant major contracts/projects. Work to harmonise H&S requirement for contracts is continuing. All long term contracts make specific stipulations on H&S requirements and are audited regularly with recommendations fed back to contract or account managers. Safety scorecards, where appropriate, contain supplier related metrics, which are then monitored at safety governance meetings.

Surface Transport’s procurement processes take into consideration business continuity and security matters, with templated requirements embedded within procurement documentation and contract templates.

Specialist Environmental expertise is provided directly to Commercial Procurement for relevant major contracts/projects from pre qualifying questions (PQQ), invitation to tender (ITT) and regular contract management. All long term contracts make specific stipulations on environmental requirements and are audited regularly with recommendations fed back to contract or account managers.

H & S Status: Implemented

Resilience Status: In place

Environment Status: In place

Development Activities: Further rollout of dashboard style contractor/supplier safety performance reports across business areas, facilitating better strategic management of procurement activity is planned.

The Surface Transport Resilience Team is liaising with procurement professionals to ensure a greater understanding and awareness of resilience requirements.

Work is ongoing to strengthen contractual environmental requirements, internal processes and procedures in relation to procurement decisions, project and contract management.

2.10 Meetings and Communication

Assurance Statement: A schedule of meetings is in place for the purpose of reviewing HSE and resilience performance and this is backed up with communications with employees on HSE and resilience issues.

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

H & S is discussed at the Surface Board which is chaired by the Managing Director. The Managing Director and the Director with H & S brief attend the Safety and Sustainability Panel. H & S governance meetings for business areas provide the opportunity to ensure that assurance and performance are systematically monitored. In other areas, H & S is an agenda item in senior management meetings.

To support the safety of the transport network, key meetings are held with strategic contractors and partners, 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), TfL Construction H&S Forum with representatives of Highways Maintenance Works Contracts (HMWCs), Construction Design and Management Working Party, Cycle Safety Working Group and Pedestrian Safety Working Group.

The Surface Resilience Management Group meets monthly to review resilience activities and matters. Resilience personnel from Surface Transport participate in the monthly Gold Support meeting and the quarterly pan TfL Resilience Steering Team meetings.

Meeting minutes are circulated widely across TfL and to chief officers and are made available on SharePoint site as appropriate.

Environmental matters including annual environmental objectives for various business areas are discussed at the quarterly HSE environmental governance meetings. In the case of Buses, separate environmental governance meetings chaired by the Director are held to reflect the level of environmental assurance required. There is currently no equivalent director-led environmental governance meeting in ST Strategy and Planning or under many of the COO areas. There is an Environment Board, a pan-TfL group that considers strategic environmental issues across TfL.

H & S Status: Implemented
Resilience Status: Implemented
Environment Status: Under development

Development Activities: A resilience SharePoint site is being developed which will hold the various resilience meeting papers.

The Surface Transport Environment Team believes that Surface Transport would benefit from strengthening its internal environmental scrutiny and governance. This is especially relevant after the Surface Integration Programme where various business units have been restructured.

2.11 Incident Reporting and Investigation

Assurance Statement: All incidents are reported and investigated in line with the defined procedures to identify root causes and learn lessons and where needed to take corrective actions.

Description: Surface Transport and TfL management system procedures include the requirement for reporting and investigating accidents and incidents to staff and for the reporting and investigation of major incidents as defined by the Group Health, Safety and Environment standard.

A bespoke web-based incident reporting system (IRIS) is in place which is further enhancing incident reporting and analysis capabilities.

Surface Transport has competent accident investigators that meet the standards required by the Institute of Industrial Accident Investigators.

The company has introduced a lessons identified process to follow up learning points and issues from training exercises, planned events and

major incidents. The process is flexible and can vary from developing timelines of events to structured debriefing of those involved.

Steps have been taken to ensure relevant contracts make necessary stipulations for environmental incident reporting to relevant regulators.

H & S Status: In place
Resilience Status: In place
Environment Status: Under development

Development Activities: Expand the utilisation of IRIS by contractors and suppliers as appropriate, to improve process for collecting and interrogating incident related data.

A systematic process for reporting environmental incidents to the Environment Team is to be put in place. Better coordination needs to be put in place between the H&S and Environment team to respond to environmental incidents.

2.12 Emergency and Recovery planning

Assurance Statement: The procedures in place for contingency and emergency planning and service recovery are clearly set out, reviewed in the light of real incidents and are tested and subjected to continual improvement.

Description: Business recovery planning and processes are a mature capability within Surface Transport with plans templated and the embedded within the business. A business impact assessment for the purposes of developing business continuity capabilities has been undertaken during this period. A scorecard for business recovery plans is reviewed monthly.

Contingency and emergency plans are in place and regularly reviewed with a programme of exercises to test and assess capabilities.

Resilience Status: Implemented

Development Activities: Contingency and emergency plans are being reviewed and a business scorecard will be developed to drive continual improvement across Surface Transport.

2.13 Testing and Exercising

Assurance Statement: There are programmes in place to regularly test and exercise plans and processes to ensure they are fit for purpose and that staff development is in place and delivered to ensure the plans and processes can be executed.

Description: There is a resilience exercise guidance document available on Source and a published programme of resilience and business recovery exercises reviewed at the monthly SRMG meeting.

Resilience Status: Implemented

Development Activities: The Resilience Team is developing a matrix of capabilities to exercise. This will ensure all capabilities are exercised in a structured manner permitting learning and continual improvement to be embedded within resilience capabilities.

2.14 Assuring Performance

Assurance Statement: Performance is assured through a programme of monitoring, reviewing the outcomes of incident investigations and audits. An annual programme is in place to collate this and provide an overall and consolidated picture to senior management.

Description: Assurance of H & S is undertaken across Surface Transport through a combination of audits by the Surface Safety Team and senior management safety tours. Physical condition surveys planned general inspections and operational inspections are also undertaken.

On an annual basis, a Safety Management Maturity Model (SM3) assessment is undertaken across all business areas, and the findings are then used to inform the safety improvement plans.

There are processes within business areas to track actions arising from the range of compliance verification tools employed including audits, safety tours and the HSE/IOD Checklist.

H & S is also reviewed by Surface Transport directors at the Surface Board meetings with a performance report submitted on a periodic basis.

Resilience performance is assured through reviewing the outcomes and learning of test exercises, planned major events and major incidents and audits, which are reported to senior management via the SRMG.

Environmental Assurance is undertaken across Surface Transport through environmental audits by members of the environment team. These audits are carried out in line with the H & S and Environmental assurance programmes.

H & S Status: Implemented

Resilience Status: In place

Environment Status: In place

Development Activities: Surface Transport is progressing work with business areas to strengthen the existing arrangements for measuring H&S performance so that it fits within the organisation's performance reporting framework which considers progress against the ten principle strategic outcomes.

The Resilience Team is working to strengthen the lessons learnt process and the development of business scorecard for resilience activities.

Surface Transport is progressing work with business areas to strengthen the existing arrangements for measuring environmental performance so that it fits within the organisation's performance reporting framework which considers progress against the ten principal outcomes.

2.15 Review of the Management System

Assurance Statement: Scheduled management reviews of the HSE and Resilience management systems are conducted and where gaps or shortfalls are identified, necessary improvements are put in place.

Description: The new TfL-wide management system outlines the arrangements for systematically reviewing content and material. In addition, Surface Transport specific documentation, procedures and tools are programmed for review as appropriate, including legislative changes and those resulting from organisational or post-incident activity.

Resilience activities are governed by both a pan-TfL and a Surface Transport resilience policy documents with a suite of processes supporting resilience activities.

H & S Status: Implemented

Resilience Status: Implemented

Environment Status: In place

Development Activities: As part of Surface Transport's commitment to continuous improvement of its health and safety management systems, 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. Surface Transport will ensure that any organisational changes are reflected within the relevant management systems.

Resilience policies and processes are being consolidated within the company management system as it is being implemented.

Leon Daniels, Managing Director, Surface Transport.

17 September 2014.

Crossrail

1.0 Introduction

This letter documents the status of the Health, Safety and Environment and the Resilience Assurance process for Crossrail Limited as at 3rd June 2014.

Crossrail manages the design and construction stages of a new railway and, hence, unlike TfL's other subsidiaries, is not currently an operational unit. The statements below give an overview of the current position and any planned work.

All development activities for Health & Safety, Environment and the Resilience Assurance processes are managed in accordance with the requirements of the following international standards:

- Occupational Health and Safety Assessment Series, BS OHSAS 18001
- Environmental Management, BS EN ISO 14001
- Business Continuity, ISO 22301:2012
- Quality Management Systems, BS EN ISO 9001

2.1 Health, Safety and Environment (HSE) and Resilience Policies

Assurance Statement: The TfL HSE Policy Statement has been adopted and specific Business Area arrangements are aligned to the policy. The Business area complies with the TfL Resilience Policy Management Framework and has a clear policy on resilience arrangements, with arrangements aligned. Both policies are communicated to all employees.

Description: In 2013 Crossrail published new Policies for Business Continuity and Environmental requirements applicable to all aspects of the Crossrail Programme. Implementation of these policies within the Crossrail team is through the Crossrail Management System while implementation by suppliers and industry partners is achieved through contracts and agreements developed by the Crossrail Team in accordance with the Management System.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: These Crossrail Policies are subject to scheduled management reviews in accordance with the requirements of the aforementioned international standards.

2.2 Legal Compliance

Assurance Statement: The specific Business Area will have a clear understanding of the extent of the legal requirements with respect to Health and Safety and Environmental protection, as well as the Civil Contingencies and Crime and Disorder requirements, and will understand the level of compliance with those requirements.

Description: To ensure legal compliance, Crossrail reviews relevant legislation to maintain Legal and Other Requirements registers for H&S and Environmental requirements. These registers are maintained in accordance with the Crossrail Management and Assurance Systems.

Crossrail recognises that the Duty Holders of the final operational railway will collectively perform the requirements of Category 2 responders under the Civil Contingencies Act 2004 (CCA).

In developing the design of the railway Crossrail has applied, in consultation with Rail for London, Network Rail, London Underground and the London Fire Brigade (LFB), design standards and operational concepts consistent with good practice on other railways and which therefore should not unreasonably constrain the future duty holder's ability to respond to their duties under CCA.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: Legal compliance is subject to scheduled management reviews in accordance with the relevant requirements of the aforementioned international standards.

2.3 HSE and Resilience Management Systems

Assurance Statement: The Management System within each Business area will cover HSE and Resilience areas. These will be written down and those with roles and responsibilities within them will be identified. The importance of complying with the management system will be understood at all levels.

Description: The Crossrail Business Continuity Management System (BCMS) complies with ISO 22301:2012 the international standard for Societal Security – Business Continuity Management Systems (BCMS).

Crossrail has developed and implemented an Environmental Management System (EMS) under Crossrail Environmental Minimum Requirements. The Crossrail EMS is certified to ISO14001, the International Standard for Environmental Management Systems.

Crossrail has developed and implemented an Occupational Health and Safety Assessment Management System which is certified to BS OHSAS 18001.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: The Crossrail management systems are developed in accordance with the requirements of the relevant international standard. The BCMS is embedded into the Crossrail Team through a continuous programme of training and exercise events.

2.4 Management Competence

Assurance Statement: The levels of competence have been identified for all roles and there are procedures in place to develop and assess individuals with defined responsibilities. Development programmes will exist for new and existing staff.

Description: Crossrail's performance management system details competency frameworks for functions including HSE and Resilience competencies. All staff are recruited against detailed job descriptions. In addition all Crossrail staff with HSE roles are assessed against training needs matrix which identify minimum requirements for these roles. Training is supplied to address any identified gaps. The HSE Directorates periodically review the procedures and provide technical support to teams delivering on training requirements.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: Crossrail has a programme of exercises involving the Crossrail Team and industry partners to test their emergency response plans and procedures. This programme will be reviewed and new objectives identified for the 2014/15 programme. Business continuity training for key staff in the Crossrail Team is run alongside the exercise programme. Training is delivered across the project in a variety of Health and Safety disciplines e.g. Construction (Design and Management) Regulations 2007.

2.5 Objectives / Key Performance Indicators (KPI's)

Assurance Statement: Objectives, Targets and KPIs have been set for the year. These are used to monitor HSE and resilience performance and this is reported back to senior management.

Description: Crossrail has developed a number of objectives and targets for HSE and Resilience to monitor performance. These are monitored and reviewed on a periodic basis by the HSE Directorates in accordance with the Crossrail management system to measure the effectiveness of controls and outcomes and in turn feed into reports. The Crossrail Health and Safety Performance Index identifies HSE performance for Crossrail and indicates areas of concern. The index is reviewed monthly by senior

management and at the end of each year KPIs are set for the following year.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: Objectives and Key Performance Indicators are subject to scheduled management reviews in accordance with the relevant requirements of the aforementioned international standards.

2.6 Risk Assessments

Assurance Statement: A programme of risk assessment is in place to ensure all risks are reduced to ALARP (as low as reasonably practicable) through implementation of control measures and on-going review.

Description: Crossrail has established a clear hierarchy to manage risk information within the programme. This ensures that risks are managed at the most appropriate level in the organisation through a tiered system of risk registers which closely reflect the organisation and accountability breakdown structure. For example Crossrail has prepared a central risk register which is designed to capture all risks associated with HSE. These risk registers range from risks associated with the delivery of project scope through to strategic risks which are reviewed every period by the Risk Sub-Committee (a Board sub-committee). In addition each Crossrail contract is responsible for maintaining a risk register.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: Risk assessments are subject to scheduled management reviews in accordance with the relevant requirements of the aforementioned international standards.

2.7 Operational business planning

Assurance Statement: The day to day operational and project delivery needs to ensure that HSE and Resilience is included in all that is undertaken.

Description: A process of hazard identification, risk assessment and controls are part of the Crossrail planning process as per question 2.6. This process focuses on the most important risks concerning activities staff and others who come in contact with the Crossrail programme may face. It is recognised that hazards will change as the Crossrail programme progresses and therefore risk assessments are periodically reviewed and may be subject to more frequent monitoring subject to the risk concerned.

Threat assessments are included in these procedures and consider information held in the ARM database, (Crossrail Risk Management Process identified in the Risk Management Plan). These assessments aim

to identify single points of failure and where possible identify mitigation options for implementation.

Crossrail Team activities and operations that give rise, or may give rise, to significant environmental risks are controlled by the inclusion of environmental requirements in all aspects of the design and delivery of the programme. Designers and contractors works are controlled by a process involving environmental consents applications which are reviewed by Crossrail All potential changes from the agreed programme are managed by a Trend and Change Control Procedure

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: Operational business planning is subject to scheduled management reviews in accordance with the relevant requirements of the aforementioned international standards.

2.8 Change management

Assurance Statement: Changes may have HSE and Resilience risks associated. So changes will only be made when these risks are clearly understood, analysed, assessed, been through the appropriate consultation process and where there is proper control plans in place and monitored.

Description: Crossrail has a documented process for the identification, evaluation and the controlled implementation and adoption of Health & Safety changes. Potential changes from the agreed programme concerning HSE requirements are managed by a Trend and Change Control Procedure within the HSE Management Systems. The business continuity management system has a schedule of reviews and internal audit to promote a cycle of continuous improvement in resilience measures.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: Change management is subject to scheduled management reviews in accordance with the relevant requirements of the aforementioned international standards.

2.9 Procurement Management

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

Description: Procurement is managed as set out in the Crossrail Procurement Code which defines the procurement processes needed to enable Crossrail to purchase all the things it needs. HSE and resilience

credentials of all suppliers for design, construction and operation of the railway, including designers and contractors, are evaluated during procurement stages and HSE requirements are included in all tender and contract documents as appropriate.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: Procurement management is subject to scheduled management reviews in accordance with the relevant requirements of the aforementioned international standards.

2.10 Meetings and Communication

Assurance Statement: A schedule of meetings is in place for the purpose of reviewing HSE and Resilience performance and this is backed up with communications with employees on HSE and resilience issues.

Description: Crossrail HSE and Business Continuity have scheduled meetings at all levels of the Crossrail Programme including contractors and Industry Partners to develop initiatives, share best practice and review performance. In addition to meetings, Crossrail uses various methods to communicate with staff and contractors dependent upon the type of information to be communicated and includes: 'Connect in Brief' articles, Toolbox talks, Email: Target Zero email address: targetzero@crossrail.co.uk, Safety alerts, posters, leaflets and onsite newsletters.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: Meetings and communications are subject to scheduled management reviews in accordance with the relevant requirements of the aforementioned international standards.

2.11 Incident Reporting and Investigation

Assurance Statement: All incidents are reported and investigated in line with the defined procedures to identify root causes and learn lessons and where needed to take corrective actions.

Description: In addition to contractors own incident reporting and investigation systems, details of all incidents are recorded in the Crossrail Incident Management System RIVO Safeguard database so that trends and corrective actions can be monitored.

Following any incident, an investigation is completed and corrective actions are identified to prevent reoccurrence. The findings from the investigation and the corrective actions are recorded in the Crossrail RIVO Safeguard database to enable the actions from the investigation to be tracked until they are closed.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: Incident reporting and investigation is subject to scheduled management reviews in accordance with the relevant requirements of the aforementioned international standards.

2.12 Emergency and Recovery planning

Assurance Statement: The procedures in place for contingency and emergency planning and service recovery are clearly set out, reviewed in the light of real incidents and are tested and subjected to continual improvement

Description: The Crossrail Incident Management Plan covers all activities within the Crossrail organisation, including arrangements to support contractors experiencing a site emergency. The incident management structure of Gold (director) Silver (project manager) and Bronze (contractor manager) can be escalated to include the Gold Response Team, Crossrail directors from across the Crossrail organisation, who can provide comprehensive support to a contractor experiencing an emergency. Crossrail has further developed its business continuity management system to meet the requirements of the programme and to align with ISO 22301:2012, Business Continuity.

In order to ensure these arrangements are continually reviewed and improved, the business continuity management system is part of the H&S management review process which assesses the effectiveness of the system through the review of the policy and objectives, audit results, incident and exercise reports and preventative and corrective actions.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: Emergency and recovery planning is subject to scheduled management reviews in accordance with the relevant requirements of the aforementioned international standards.

2.13 Testing and Exercising

Assurance Statement: There are programmes in place to regularly test and exercise plans and processes to ensure they are fit for purpose and that staff development is in place and delivered to ensure the plans and processes can be executed.

Description: As part of its commitment to an effective and embedded business continuity management system, Crossrail has developed a programme that involves a range of different types of exercises to ensure the business continuity objectives can be met. These exercises range from

full simulation and desktop exercises to lessons learnt sessions which cover improvements in the processes. The programme is reviewed annually to ensure it meets the needs of the Crossrail programme.

HSE Status: **Implemented**
Resilience Status: **Implemented**

Development Activities: A training programme for key staff with incident response roles at all levels is being delivered over the next twelve months.

The testing and exercising programme is subject to scheduled management reviews in accordance with the relevant requirements of the aforementioned international standards.

2.14 Assuring Performance

Assurance Statement: Performance is assured through a programme of monitoring, reviewing the outcomes of incident investigations and audits. An annual programme is in place to collate this and provide an overall and consolidated picture to senior management.

Description: The Crossrail Health and Safety Assurance Procedure covers the activities of Crossrail, management of interfaces with Industry Partners and the monitoring of contractors as required by the Construction (Design and Management) Regulations 2007. The arrangement for undertaking this monitoring is set out in the health and safety assurance plan. This plan details the schedule of H&S assurance checks covering defined topics per period. The findings of these checks are issued to all relevant parties. Where necessary corrective action requests are raised and these are monitored to closure.

Health and safety assurance priorities are established during regular management system reviews and documented in the H&S Assurance Plan. Additions or changes to the planned assurance activities arising from emerging adverse trends can be made at any time by the Assurance manager in consultation with the Health & Safety Director.

A schedule of HSE and Facilities inspections are undertaken to ensure the safety and wellbeing of Crossrail employees and to protect the environment on sites where Crossrail staff are working or Crossrail have direct responsibilities. These inspections, which are known as Golden Rules Observation Tours, monitor safe site working and compliance with HSE legislation and are recorded on the RIVO Safeguard system.

HSE Status: **Implemented**
Resilience Status: **Implemented**

Development Activities: Assurance is subject to scheduled management reviews in accordance with the relevant requirements of the aforementioned international standards.

2.15 Review of the Management System

Assurance Statement: Scheduled management reviews of the HSE and Resilience management systems are conducted and where gaps or shortfalls are identified, necessary improvements are put in place.

Description: Scheduled management reviews are carried out in accordance with the requirements of the following International Standards:

- BS EN ISO 9001 Quality Management Systems
- Business Continuity, ISO 22301:2012
- BS EN ISO 14001 Environmental Management Systems
- BS OHSAS 18001 Occupational Health and Safety Assessment Series

A Management System Review takes place at six monthly intervals to review performance in relation to the Crossrail Management System. The report on the outcome of the Management System Review meeting is provided to the Executive.

Management Systems Review Report includes but is not limited to the following elements in the manner and form set out below:

- Action from previous Management System Review
- Key achievements and objectives
- Policies
- Results from audits
- Preventive Action
- Complaints
- Performance
- Incident Investigation
- Significant Changes in health, safety and environment legislation
- Changes that could affect the management system
- Results of participation and consultation
- Resources and Training

HSE Status: Implemented

Resilience Status: Implemented

Development Activities: The management system is subject to scheduled management reviews in accordance with the relevant requirements of the aforementioned international standards.

David Allen, Director of Finance, Crossrail on behalf of Andrew Wolstenholme OBE, CEO, Crossrail.

19 September 2014

TfL Specialist Services Directorates

1.0 Introduction

This Letter documents the status of the Health, Safety and Environmental Management System (HSEMS) for the Specialist Services Directorates, (previously termed the Corporate Directorates). The answers apply to all the Specialist Services Directorates, with any specific points highlighted.

2.1 Health, Safety and Environment (HSE) and Resilience Policies

Assurance Statement: The TfL HSE Policy Statement has been adopted and specific business area arrangements are aligned to the policy. The HSE business area complies with the TfL Resilience Policy Management Framework and has a clear policy on resilience arrangements, with arrangements aligned. Both policies are communicated to all employees.

Description: TfL has HSE and Resilience Policies which the Specialist Services Directorates comply with. These policies are displayed in all TfL offices where Specialist Services staff work, and the policies are brought to the attention of all new starters as part of their induction. The policies are used as a basis for overall HSE and Resilience management by the leadership teams in each Specialist Services Directorate. During 2013/14 the HSE Policy was completely revised and reissued in a more engaging and accessible style.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities: No specific measures planned.

2.2 Legal Compliance

Assurance Statement: The specific business area will have a clear understanding of the extent of the legal requirements with respect to HSE protection, as well as the Civil Contingencies and Crime and Disorder requirements, and will understand the level of compliance with those requirements.

Description: Legal compliance is key to all the Specialist Services Directorates. They are aware of their legal duties, and have specialist support to ensure they maintain compliance. The legal compliance report for TfL is maintained by General Counsel, and reported to the TfL Audit and Assurance Committee and for HSE matters to the TfL Safety, Accessibility and Sustainability Panel. The requirements for compliance with Civil Contingencies is maintained with support from the TfL Resilience Manager, and the Head of Facilities.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: TfL will undertake the annual review of business impact and business continuity during the year, and implement any key findings from this review, which is monitored by the TfL Resilience Steering Team.

2.3 HSE and Resilience Management Systems

Assurance Statement: The Management System within each business area will cover HSE and Resilience areas. These will be written down and those with roles and responsibilities within them will be identified. The importance of complying with the Management System will be understood at all levels.

Description: The current TfL HSE Management System and Resilience Management approaches provide the current structure, giving clarity with respect to roles and responsibilities. During 2013/14 elements of an integrated TfL Management System were rolled out covering HSE; Information Governance and Human Resources.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: The further development of the integrated TfL Management System will strengthen the processes and procedures in the Specialist Services Directorates, as this is rolled out during 2014/15.

2.4 Management Competence

Assurance Statement: The levels of competence have been identified for all roles and there are procedures in place to develop and assess individuals with defined responsibilities. Development programmes will exist for new and existing staff.

Description: All senior management in the Specialist Services Directorates have either attended or will be scheduled to attend the TfL Safety Leadership training. Specific specialist HSE and Resilience support is dedicated to the Specialist Services Directorates. New staff receive an induction which includes HSE and Resilience elements.

HSE Status: In Place
Resilience Status: In Place

Development Activities: A development of the induction to strengthen the understanding of the HSE and Resilience activities in TfL is being developed for roll out in 2014/15, with work to identify specific training and development needs for Annual Appraisal to support managers being developed.

2.5 Objectives / Key Performance Indicators (KPIs)

Assurance Statement: Objectives, targets and KPIs have been set for the year. These are used to monitor HSE and Resilience performance and this is reported back to senior management.

Description: In the low hazard office environment, objectives and targets have not yet been set. However risks are properly controlled through Planned General Inspections of the work environment.

HSE Status: Under Development

Resilience Status: In Place

Development Activities: It is proposed to develop appropriate objectives and targets in 2014/15 and to ensure that all Support Services areas have reports on HSE performance.

2.6 Risk Assessments

Assurance Statement: A programme of risk assessment is in place to ensure all risks are reduced to ALARP (as low as reasonably practicable) through implementation of control measures and on-going review.

Description: A programme of risk assessments is in place to ensure all risks within the business area have been identified, and the level of risk assessed. Control measures have been put in place to mitigate the risks to ensure they are ALARP (as low as reasonably practicable) and the assessments reviewed to check the effectiveness of actions.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities: A programme supported by the Corporate HSE team looking into developing training for staff to understand better the impact of their decision making on HSE and Resilience is planned for 2014/15.

2.7 Operational Business Planning

Assurance Statement: The day to day operational and project delivery needs to ensure that HSE and Resilience is included in all that is undertaken.

Description: HSE and Resilience are part of the decision making in the Specialist Services Directorates. There is specialist support to this. A single TfL project management methodology (Pathway) was introduced in January 2013 and through 2013/14 a programme to embed effective use of the methodology was rolled out across TfL.

HSE Status: In place
Resilience Status: In place

Development Activities: During 2014/15 Pathway will be further embedded in the business.

2.8 Change Management

Assurance Statement: Changes may have HSE and Resilience risks associated. So changes will only be made when these risks are clearly understood, analysed, assessed, been through the appropriate consultation process and where there is proper control plans in place and monitored.

Description: Change is managed in each Directorate through Directorate level processes. This has been deployed with respect to the changes in the organisation over the past three years, and maintains a controlled approach. Resilience is managed within each Directorate, but coordinated through Corporate Facilities and the TfL Resilience Steering Team. During 2013/14 as the One TfL Management System developed, a means of making change to the system was also developed involving stakeholders across TfL. The delivery of business continuity and overall business resilience was reviewed across the whole of TfL, including the Specialist Services Directorates in 2013/14, to ensure it remained effective following changes in TfL.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: During 2014/15 further work will be undertaken to ensure the alignment of business continuity between the operational centres and the core HQ offices.

2.9 Procurement Management

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

Description: HSE and Resilience is routinely considered in procurement decisions and is described in TfL's Procurement Toolkit. The development of Pathway (TfL's project management methodology) is a significant development in ensuring that HSE and Resilience matters are considered as part of procurement, and has strengthened this aspect of the Specialist Services Directorates work for projects.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: During 2014/15 a standardised Pan TfL question set for HSE aspects of procurement will be developed.

2.10 Meetings and Communication

Assurance Statement: A schedule of meetings is in place for the purpose of reviewing HSE and Resilience performance and this is backed up with communications with employees on HSE and Resilience issues.

Description: HSE and Resilience performance is considered at leadership level in each of the Specialist Services Directorates, through the periodic team meetings.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities: No specific improvement actions are planned.

2.11 Incident Reporting and Investigation

Assurance Statement: All incidents are reported and investigated in line with the defined procedures to identify root causes and learn lessons, and where needed to take corrective actions.

Description: All accidents are reported and investigated, with support from the specialist HSE resource. Accidents and incidents are considered and learning taken from these (actually quite rare) events to better avoid in the future.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities: During 2014/15 new HSE reporting tools will be implemented and a revised HSE intranet site will be developed to better share lessons.

2.12 Emergency and Recovery Planning

Assurance Statement: The procedures in place for contingency and emergency planning and service recovery are clearly set out, reviewed in the light of real incidents and are tested and subjected to continual improvement

Description: Building contingency planning is well developed, and the reactive processes to deal with emergencies are effective. The development of mutual aid within TfL - rather than relying on a specialist outsourced contractor - has proved to be effective. With more remote working capability and hot desk provision through One London, the pan-

TfL IT system, there is greater flexibility of location. This was tested in reality during the Olympic and Paralympic Games.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities: Building on the work undertaken in 2013/14, further work to provide additional strength in business continuity of our HQ buildings will be taken forward

2.13 Testing and Exercising

Assurance Statement: There are programmes in place to regularly test and exercise plans and processes to ensure they are fit for purpose and that staff development is in place and delivered to ensure the plans and processes can be executed.

Description: There are regular fire evacuation exercises from all buildings. During the Olympic and Paralympic Games and afterwards practical planning has proved the procedures are fit for purpose. This has been further added to in terms of learning from GLA run events

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: Further exercises to maintain current standards will be undertaken in 2014/15.

2.14 Assuring Performance

Assurance Statement: Performance is assured through a programme of monitoring, reviewing the outcomes of incident investigations and audits. An annual programme is in place to collate this and provide an overall and consolidated picture to senior management.

Description: Audit across TfL is undertaken by TfL Internal Audit. There is a dedicated HSE and Technical Audit Team within Internal Audit who develop and deliver a fully risk based audit programme covering TfL. Given the lower hazards presenting in the Specialist Services Directorates HSE audits are not routinely conducted. However the HSE audit programme is reviewed and agreed by senior HSE management, including those responsible for HSE advice in the Specialist Services Directorates. The schedule of audits is an integral part of the wider TfL Assurance Plan, developed by the Assurance Delivery Group.

In addition to audit work undertaken by Internal Audit, a programme of HSE Planned General Inspections and Safety Tours is carried out in the locations where Specialist Services staff are based.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: During 2014/15 there will be further development of the audit planning and delivery to ensure it focuses even more on key risks and controls.

2.15 Review of the Management System

Assurance Statement: Scheduled management reviews of the HSE and Resilience Management Systems are conducted and where gaps or shortfalls are identified, necessary improvements are put in place.

Description: Currently the review of performance is managed through the Specialist Services leadership teams. They have specialist HSE and Resilience support from the TfL Head of Resilience and the Head of HSE, Rail and Corporate and their respective teams. There is also close co-operation between the HSE support in Facilities and the HSE team. Any incidents are fully investigated and lessons passed on.

During 2014/15 the HSE and Facilities teams will work even closer together to provide a better service to the Specialist Services Directorates. The leadership team members of the Directorates have all been trained in Safety Leadership as part of the TfL wide training initiative.

HSE Status: In place

Resilience Status: In place

Development Activities: In 2014/15 a programme of work to analyse all HSE processes to ensure they are as effective and efficient as possible will be commenced.

Howard Carter, TfL General Counsel.

22 September 2014.