

Date: 13 October 2015

Item: 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 2014/15.

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 eight years. These letters provide documentary evidence of a self-assuring process within each of TfL's business areas. Each Operating Business, Crossrail and the Specialist Services Directorates reviews its performance against defined assurance statements. From 2015/16 the Assurance Letters will also cover TfL Crossrail (operations). For each statement a level of maturity is identified as follows:
- (a) 'Under development' - work is in progress to deliver documented processes, procedures, standards etc.
 - (b) 'In place'- refers to documented processes and standards that have not yet been implemented in their entirety.
 - (c) 'Implemented'- where all processes are documented and are being complied with, including active monitoring, audit and review arrangements to effect continuous improvement.
- 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 in the appendices listed below.
- 3.3 In future years consideration will be given to using a nationally or internationally recognised management system maturity assessment model, rather than the TfL Assurance Letter process. This approach would provide benchmarking against other organisations and provide a direct drive for further improvement, as most models of this type require evidence of continuous improvement.

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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) to the end of March 2015.

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 a specific Health, Safety and Environmental (HSE) Policy. This policy is consistent with that for Surface Transport and so reflects a consistent approach across TfL. The 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 displayed on notice boards in all LU stations, depots, offices and other premises. It is also displayed at all LR premises. An internal audit in June 2014 highlighted that LU's and LR's HSE policy did not meet best practice in respect of environmental issues. The policy was redrafted covering this area in more detail during 2014/15 and was issued in May 2015.

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. The Resilience Policy and associated guidance is available on TfL's intranet "Source" and is accessible to all within LU and LR.

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

Development Activities:

The Resilience Policy has been reviewed, updated and will be shortly

ratified and issued.

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 System (HSEMS) was developed to meet health, safety and environmental legal requirements. The HSEMS is subject to periodic review to ensure it continues to meet legislative and business requirements. During 2013/14 the health and safety elements of 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. During 2014 /15 the environmental elements of the HSEMS across London Underground, London Rail and Surface Transport were similarly integrated. The responsibilities of managers across LU and LR are documented in job descriptions and supported by training - at senior level through a bespoke TfL Safety Leadership course. The HSE element of the Working at TfL intranet site also describes the roles and responsibilities of directors, senior managers, managers and employees in relation to HSE matters.

The elements of the HSEMS relevant to the operation and maintenance of LU are described in the London Underground Safety Certificate and Authorisation. Docklands Light Railway's Safety Authorisation was submitted and accepted by the Office of Rail and Road (ORR) in 2013/14. The London Overground Safety Authorisation was revised and was submitted and accepted by the ORR in August 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.

TfL is a category two responder under the Civil Contingencies Act 2004. It 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. TfL liaises with other category one and two organisations across London through TfL chairing the Transport Sector Panel of the LRF.

The Resilience Planning Team 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.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities:

Due to organisational change within London Underground the Safety Certificate and Safety Authorisation (SC and SA) no longer reflected the way the business operated. During 2014/15 the Safety Certificate and Safety Authorisation was re-written to correct this anomaly. This is part of the ongoing review of the suitability of the SC and SA during the 5 year cycle between statutory re-assessments by the ORR. The opportunity was also taken to simplify the document using guidance published by the ORR. This ensures the Safety Certificate and Safety Authorisation continues to serve business needs and meet the expectation of the ORR.

This update was not a substantial change as defined in the Railway and Other Guided Transport Systems Safety Regulations as there had been no substantial change to the way the railway was operated or maintained or any increase in risk. Re-assessment by the ORR of the SC&SA was not required, although they were shown the new version.

During 2013 /14 Rail and Underground undertook an assessment of the maturity of the Health and Safety Management System using the ORR's, Rail Management Maturity Model (RM3). The results indicate that LU and LR have a compliant approach to health and safety management. Improvement actions identified from this assessment were included in the Health, Safety and Environment Improvement Plans for both Rail and Underground. This is a 5 year plan, after which a re-evaluation will be undertaken. All actions were delivered through 2014/15. In the light of experience gained, and through pro-active review, an ever better understanding of the resilience status of LU and LR is gained and actions to strengthen resilience implemented.

A review of compliance against all aspects of the Electricity at Work Regulations 1989 and the Working at Height Regulations 2005 commenced in 2014/15 and will continue in 2015/16. The intent is to identify whether better mitigation of risk may be applied, including that now possible in the light of technical advance.

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 the Docklands Rail Information System, DORIS, and other LR employees through 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 are 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 plans each year. These plans are approved annually by the Rail and Underground Board and progress is monitored and reviewed throughout the year. Within LU Operations it is intended in 2015/16 to move to three year improvement plans.

Detailed health, safety and environmental improvement programmes are part of the Rail and Underground Plan, which is available on the LU intranet and TfL's intranet, Source. This can be accessed by all those in LU and LR.

The HSEMS in its current format has existed since 2001. Updates and enhancements have been made annually since that time - and the London Underground and London Rail safety record shows that they are some of the safest railways in the world. However, a fundamental review of the activities required of the business by the HSEMS has not been undertaken for some years. In 2015 /16 an in depth analysis of the HSEMS using the lean - six sigma analytical technique will begin. This is intended to challenge, strengthen, and simplify the system.

Risk controls to reduce the risk of terrorism are set by the Department for Transport and managed via a regulatory arrangement. Responses to any incidents are coordinated from the London Underground Control Centre where we have senior managers who work closely with British Transport Police colleagues.

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 and LR 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. These systems are subject to audit on a risk basis.

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. These arrangements are periodically audited in both LU and LR.

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

Development Activities: Within London Underground, and as part of the Fit for the Future Station Programme to enhance the customer facing capability of staff, more effective observation and feedback to Station Staff on their competencies will be introduced. This will be done by integrating observations of competence as part of the day to day role of managers, rather than as a specific exercise.

"Managing Essentials", a pan-TfL training programme to raise managers' competence, including HSE competence, is in place and is being rolled out across LU and LR.

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 was 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. 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 pro-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 2015 /16 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. This review will also explicitly consider how HSE data and information is provided and used to ensure that it supports excellence in HSE decision making. Within LU CPD a suite of leading indicators was introduced 18 months ago – "The Supplier Assessment Tool". The assessment is completed on a quarterly basis against a number of predefined quality criteria, resulting in a performance score. The Tool has helped drive improvement through the supply chain and is currently undergoing revision to target its focus. This will ensure that outputs of the Tool are of continuing value to the business and the supply chain.

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 System.

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). The Strategic Risk Register is reviewed by the Rail and Underground Board periodically and is also used to inform the LU and LR audit programme.

Through contractual requirements, suppliers to LU and LR are required to have suitable HSE management system including systems for assessing risks to those who may be affected by their activities.

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

Development Activities: During 2014/15 a fundamental review was undertaken of the health, safety and environmental risks recorded in the London Underground and Rail Active Risk Manager database. An increased number of key risks have been included to better reflect the risk profile of the London Underground and London Rail businesses. As part of the HSEMS review noted in section 2.3 of this letter, in 2015/16 a review will be made of the way in which risk assessment is undertaken to ensure it remains fully effective.

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: For LU, the activities required to ensure the health and safety of customers and employees and that the environment is not adversely impacted are 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. TfL's project and programme prescribes the approach to adopt towards health, safety and environment in project delivery. The Franchisees providing operational services for LR have similarly defined operational arrangements. Project management in LR is also subject to requirements of Pathway.

The TfL Project Management methodology, Pathway, prescribes the steps required to ensure effective management of health, safety and the environment in project delivery across TfL including LU and LR. TfL assesses the effectiveness of Pathway using the defined assessment tool: Portfolio, Programme and Project Management Maturity Model (P3M3) and the findings of project assurance reviews, in addition to audit activity.

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. Opportunities to enhance resilience are identified through: desk top exercises; live role play exercises with the emergency services or through experience. These are built into operational response plans and other LU and LR management system procedures such as the operational Rule Book.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: Pathway was introduced in January 2013. A review of Pathway's effectiveness has been undertaken (informed by P3M3 assessment, project assurance findings and audit) and a Pathway "refresh" project scoped, for delivery through 2015/16. This includes improving the project assurance arrangements which include consideration of the health, safety and environmental elements of Pathway.

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 for both LU and LR 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. All change proposals meeting certain criteria and which may potentially significantly affect the safety of customers, employees or the public are reviewed independently within LU by the Directors Risk and Assurance Change Control Team (DRACCT). The Programme Boards overseeing Project delivery within LU and LR consider and approve other changes arising from projects with potential HSE risk – in compliance with Pathway requirements.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: No specific actions are planned for 2015/16.

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 of which the LU HSE Work Instructions (contractual clauses included in contracts with suppliers) form part. These were reviewed in 2014/15 to reflect changes in legislation and best practice learning. 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 2015/16 the instructions and guidance material enabling effective procurement, including HSE considerations, is being enhanced and made easier to find and use on the TfL intranet. Additionally a single suite of HSE Invitations to Tender (ITT) questions is being developed for use across LU, LR and Surface Transport.

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 HSE improvement actions detailed in the Rail and Underground Plan. Each period there is also a formal review of health, safety and environmental 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 Health, Safety and Environment Board as part of the Rail and Underground Plan. There are also discrete HSE Improvement Plans for London Underground Operations, the Capital Programmes Directorate and London Rail.

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: As part of the review of HSEMS noted at section 2.3 of this letter it is proposed in 2015/16 to review and improve the HSE data and information provided to meetings scheduled to review HSE

performance to ensure better focus on key issues.

In June 2015/16 we re-introduced the Director level Health, Safety and Environment Board (HSEB) to provide a director level forum specifically designed to focus on HSE issues.

2.11 Incident Reporting and Investigation

Assurance Statement: All incidents including those affecting resilience 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.

Health, safety and environment incidents on LU and LR are recorded and analysed for root causes and trends (the approach to resilience issues is covered in Section 2.12). 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: To ensure robust close out of HSE actions arising from incident investigation the R&U board review any outstanding actions. During 2015/16 LU and LR will also implement a new action tracking database to strengthen and give greater visibility of close out rates (this development was delayed from 2014/15 due to technical reasons with the supporting IT system). During 2015/16 in LU Operations it is intended to review how we investigate safety issues and examine the model used by the airline industry. This is intended to segregate disciplinary action (for deliberate violations) from a difference response for other root causes.

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 is 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. This controlled approach is also used when planning for significant events in London and planned closures of the railway for engineering works.

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 2015/16 a thorough review is being undertaken into Business Continuity to ensure arrangements are fully robust. This may lead to further improvements. One improvement already made is the creation of a central reference library of all emergency and event plans at Network and more local levels – covering both operational parts of the business and Specialist Directorates. This ensures ready availability of such plans when needed. (This development activity is continued from 2014/15).

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. These overlay prescribed operational procedures to 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 individuals' 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 systems level actions are proposed for 2015/16. Note that in June 2015 Operation String Tower took place. This was a successful simulation exercise in response to a terrorist attack on the London. TfL's preparedness and response to such incidents was tested as part of the exercise.

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, is 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, the LU and Surface Transport Chief Operating Officers, the Director of London Rail 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 managers across LU and LR including senior LU and LR HSE managers. It is also reported to the Safety, Accessibility and Sustainability Panel quarterly and the Audit Committee.

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.

The processes for delivering HSE and Technical Audits were reviewed in 2014/15 and new procedures issued - to increase efficiency and ensure that audit delivers best information on how to strengthen health, safety and environment performance across TfL. Outstanding audit actions are now reviewed by the London Underground and London Rail Board every period.

In addition to audit work undertaken by Internal Audit, a programme of HSE Planned General Inspections, management checks on the efficacy of HSE systems and processes and Safety Tours is carried out across LU and LR as part of local management assurance checks. The HSE team also provides assurance / and monitors compliance with the TfL Health, Safety and Environment Management System on an ongoing basis.

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.

For Programmes and Projects TfL deploys an assurance regime that includes independent assurance reviews and for those over £50m value additional review by the Independent Investment Programme Group (IIPAG). The reviews include consideration of Health, Safety and Environment Management.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: As noted in Section 2.3 of the Letter in 2015/16 a programme of work to fundamentally review the Health, Safety and Environment Management System will be undertaken. This will lead to a strengthening of HSE assurance activity.

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. As part of this review, assessment of the HSE management system using the ORR's Rail Management Maturity Model (RM3) was undertaken in 2013 /14 and will take place on a regular basis – the next time in 2016. The output of the ORR's intervention plan is also fed back to LU and LR annually and this feeds into the Management Review and helps inform the HSE Improvement Plans in LU and LR. In between formal management 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 and the equivalent in London Rail.

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 2015/16. As noted at section 2.3 of this letter the HSE Management System will be fundamentally reviewed during 2015/16. Additionally it is proposed to review the LU and LR Management system in 2015/16 using the European Foundation for Quality Management (EFQM) model. This model is not HSE specific but covers all business activities.

Nick Brown,

Managing Director of London Underground and London Rail.

14 September 2015.

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 2015.

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. This policy is consistent with the policy for LU and LR It is made available to all staff throughout the organisation via display in the workplace and the organisations dedicated health and safety site within the TfL Intranet.

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

HSE Status: Implemented
Resilience status: Implemented

Development Activities: To ensure greater local ownership and implementation of the environmental aspects of the policy at operational level an environmental training programme has been produced and is being rolled out across Surface Transport. This focuses 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.

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 system and training. Surface Transport has effective processes in place to identify likely environmental impacts of projects and operations. Regular environmental audits and assessments are also carried out to ensure compliance with legislation.

TfL is a category two responder under the Civil Contingencies Act 2004. It 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. TfL liaises with other category one and two organisations across London through TfL chairing the Transport Sector Panel of the LRF.

The Resilience Planning Team 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.

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 of projects and operations. Regular environmental audits and assessments are also carried out to ensure compliance with legislation.

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

Development Activities: The legislative requirements associated with the changes to the Construction, Design and Maintenance (CDM) regulations are being assessed to ensure that Surface Transport has the appropriate structure and resources in place to support construction related works on TfL infrastructure.

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 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: During 2013/14 the health and safety elements of HSEMS

for Surface Transport, LR and LU were integrated, with requirements made common where sensible to do so, but remaining different where required. During 2014 /15 the environmental elements of the HSEMS were similarly integrated. This provides a comprehensive Health, Safety and Environmental Management System for all business areas of Transport for London (including Surface Transport). 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. 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.

The TfL-wide arrangements outline generic responsibilities for employees, managers, senior managers and chief officers, and this is readily available for all staff to access via the TfL Intranet. A recent review of safety and environmental management arrangements within Surface has helped to provide greater clarity and definition of safety and environmental roles and responsibilities, supported by appropriate communication to business areas.

Resilience and business continuity plans are reviewed regularly with a business scorecard being used to advise senior management within Surface Transport of the current status of the plans. Test regimes are in place to ensure the ongoing effectiveness of the arrangements.

HSE Status: Implemented

Resilience status: 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 environmental training programme that is being rolled out is 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.

In 2015 /16 Surface Transport will contribute to an in depth analysis of the HSEMS, led by the TfL Management Systems team. This will apply the lean - six sigma analytical technique to strengthen while simplifying the system.

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 arrangements.

The competence management and monitoring arrangements of those operating services or undertaking works on behalf of TfL Surface Transport are assessed pre-contract award and subject to ongoing monitoring throughout the life of the contract as part of the Surface Transport Assurance Plan.

Surface Transport is a British Safety Council (BSC) Registered Centre for the delivery of accredited BSC Level 2 courses in Working Safely and Supervising Safely. These arrangements are helping to simplify the processes for identifying training needs and fulfilling them cost effectively.

The recently released environmental training course allows ST to ensure that identified individuals with defined responsibilities undergo the appropriate level of environmental awareness. The course is e-Learning and therefore allows ST to track level of course attendance and completion across relevant business units.

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 reported and tracked.

A programme of Bronze (Operational) Level Events and Incidents Manager training courses, which comply with the London Emergency Services Liaison Panel (LESPL) Emergency Procedures Manual and the Skills for Justice Civil Contingencies competency framework, are being delivered in house by the Resilience planning Team.

H & S Status: **Implemented**

Environment Status: **In place**

Resilience status: **Implemented**

Development Activities:

Surface Transport is confident it has the necessary arrangements in place to allow it to ensure the competence of its workforce. This is kept under review as part its commitment to continuous improvement, with such a review identifying the need for further understanding of the management of health issues. A new module has been developed that is being rolled out during 2015/16.

The Resilience Planning 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.

A programme to deliver in house Silver (Tactical) Events and Incident Manager and Gold (Strategic) Manager courses is being developed for delivery in 2015/16.

“Managing Essentials”, a pan-TfL training programme to raise managers’ competence, including HSE competence, is in place and is being applied across Surface Transport.

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 road 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. In addition, risk reduction at a tactical level is driven through Directorate level plans.

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

HSE performance indicators are in place as part of the contract management framework for maintenance contractors. 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.

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.

HSE Status: **Implemented**

Resilience status: **In place**

Development Activities:

Following a year of full use, the Surface Transport Health and Safety Scorecard will be reviewed during 2015/16. Work is underway to identify further strategic and business level health and safety performance indicators, utilising intelligence gained through implementation of the safety scorecard (s) over the last year. These will complement and link closely with wider business objectives and plans, driving continuous improvement and safety consideration as part of day to day core activities.

Resilience activities are grouped into workstreams and a resilience scorecard is being developed to include performance indicators and progress against identified targets.

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: The Surface Transport Strategic Risk Register details significant safety risks across the network, focussing on high impact/severity events such as catastrophic structural failure. Lower consequence, but higher probability events are captured within business area risk registers, informed by 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.

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.

Contingency and emergency plans are driven by catastrophic, major and significant risks identified on the ARM software. The Resilience Planning 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.

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

Development Activities:

Risk assessment reviews for operational activities are to be more closely monitored to ensure they are carried out as scheduled, and that improvement actions and necessary controls are appropriately identified and assigned. These will then be tracked to completion at local safety governance meetings. The processes for identifying and assessing risk at the early stages of projects and initiatives is being strengthened, to allow improved mitigation measures to be included within planning activities.

The Resilience Planning team is working with the key risk representative to review catastrophic, 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.

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

A dedicated team of safety professionals support operational and project delivery, including specialists in construction and operational safety. A review was undertaken during 2014/15 of the arrangements for the co-ordination and support of health and safety related matters. The review concluded that while health and safety was being managed within the individual business areas within Surface Transport, the approaches lacked consistency and overall cohesion. As a consequence, the Directorate based health and safety functions were brought together and centralised within the organisation to facilitate a more strategic approach to the management of health and safety.

Processes are in place to identify likely environmental impacts and risks. Environmental audits are carried out as part of an assurance process.

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

Development Activities:

During 2015/16, a strategic safety group will be established representing all areas of the business and key health and safety related work streams to take forward the strategic health and safety agenda.

Safety support for project delivery is being significantly strengthened, to reflect the increased delivery of infrastructure projects in line with the TfL Investment Programme.

In 2015/16 Surface Transport will contribute to the planned review of TfL Pathway, to ensure that it fully supports effective programme and project delivery. This review will include consideration of the Health, Safety and Environmental elements of Pathway.

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

No Surface Transport specific operational resilience business planning activities have been identified as requiring further development at a strategic level.

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. Proposed changes are reviewed by the Surface Transport Board. The Head of the Surface Transport Health and Safety Team is involved in the review process. While formal arrangements exist within the management system for the review of the health, safety and environmental implication of business changes, they are inconsistently applied at present. Change management has been flagged within the staff Viewpoint survey as an area for focus and plans have been established in response.

H&S Status: **In place**
Environment Status: **Implemented**
Resilience status: **Under development**

Development Activities:

Further develop and promote the available H & S tools (such as management system procedures and Pathway project management tool) for use across all business areas, ensuring that this is supported by

effective communication of safety change requirements to all business areas. The identification and recording of safety impacts resulting from change is being improved, along with post-change reviews to ensure that risk controls are effective.

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: Specialist health, safety and environmental expertise is provided directly to Commercial Procurement for relevant major contracts/projects from prequalification questionnaires (PQQs), invitation to tenders (ITTs) and regular contract management. All long term contracts make specific stipulations on health, safety and environmental 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.

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

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

Work between Surface Transport and Rail and Underground to harmonise H&S requirements for contracts is continuing. This will ensure a consistent approach to assessing and monitoring the health, safety and environmental credentials of our respective supply chains and present a consistent approach to suppliers. Work is ongoing to strengthen contractual environmental requirements, internal processes and procedures in relation to procurement decisions, project and contract management.

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

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.

Health and Safety is discussed at the Surface Board which is chaired by the Managing Director. Health, safety and environmental performance is an integral part of the Surface Transport Periodic Performance Report reviewed by the Board, with the head of the Health and Safety Team in attendance to provide support and challenge as necessary. Alongside review of the Health and Safety Scorecard, the review includes consideration of progress against improvement and assurance plans. The Managing Director, the Director with H & S brief and the Head of the Surface Transport Health and Safety Team attend the Safety, Accessibility 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 the Bus Operators' Forum (Safety Sub Group), TfL Construction H&S Forum with representatives of London Highways Alliance Contracts (LoHACs), Construction Design and Management Working Party, Cycle Safety Working Group and the Pedestrian Safety Working Group.

Meeting minutes are circulated widely across TfL and to Chief Officers and are made available on an intranet 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 of Buses are held to reflect the level of environmental assurance required. There is currently no equivalent director-led environmental governance meeting in Surface Transport Strategy and Planning or under some of the Chief Operating Officer's areas. There is an Environment Board, a pan-TfL group that considers strategic environmental issues across TfL.

Resilience personnel from Surface Transport participate in the monthly pan TfL Gold Support meeting and the pan TfL Resilience Steering Team meetings.

<u>H&S Status:</u>	Implemented
<u>Environment Status:</u>	Under development
<u>Resilience status:</u>	Implemented

Development Activities:

As outlined in section 2.7, during 2015/16 a strategic leadership group will be established to improve co-ordination and consistency of approach to health and safety and support Board level decision-making.

A health and safety narrative is under development to improve the visibility and awareness of Surface Transport's contribution to the management and reduction of health and safety risks through our strategic activity, day to day operations and asset management, regulatory and enforcement activities. This will be supplemented with improvements in the communication of our health and safety performance.

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, and is being used to collate all staff, supplier and contractor incident data.

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

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

The company has 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.

<u>H&S Status:</u>	Implemented
<u>Environment Status:</u>	Under development
<u>Resilience status:</u>	Implemented

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 is to be put in place between the separate Health and Safety Team and the 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 embedded within the business. 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.

During 2014/15 the Strategic Co-ordination Unit was fully embedded within the business, resulting in improved information flows and enhanced co-ordination of event and incident planning and management.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities:

Contingency and emergency plans are being reviewed in 2015/16. During 2015/16 incident response arrangements will be implemented that deliver commonality of approach across TfL.

Improvements will be made in the integration of major event planning and management and incident response with other internal and external command structures.

2.13 Testing and Exercising

Assurance Statement: There are programmes in place to regularly test and exercise plans and processes. This is 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 the programme of resilience and business recovery exercises reviewed at the monthly Gold Support meeting.

HSE Status: Implemented
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 activities, inspections, 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 TfL Internal Audit, Surface Safety Teams, and senior management safety tours. Physical condition surveys planned general inspections and operational inspections are also undertaken.

Audit findings and actions are reviewed on a quarterly basis by the Board, with attendance from the TfL Internal Audit Team. 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 and safety tours.

H&S performance is reviewed by Surface Transport directors at the Surface Board meetings with a performance report submitted on a periodic basis. This includes a review of the progress of the Annual Assurance Plan. In addition, Directorate and business unit level safety scorecards contain specific metrics relating to assurance activities, which are then monitored at local and Surface level governance meetings.

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.

Resilience performance is assured through reviewing the outcomes and learning from tests, drills and exercises, planned major events and major

incidents and audits.

HSE Status: **Implemented**

Resilience Status: **Implemented**

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 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.

HSE Status: **Implemented**

Resilience Status: **Under development**

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.

As noted at section 2.3 of this Letter the HSEMS will be fundamentally reviewed during 2015/16.

Resilience policies and processes will be consolidated within the company management system as it is rolled out.

Work continues on a re-organisation of the health and safety support function within Surface Transport to bring it in line with the principles of the Surface Integration Plan. A senior manager has been seconded from the TfL Health, Safety and Environment Directorate to drive forward the change and deliver a consistent approach to health and safety which draws on best practice within and outside TfL.

Leon Daniels,

Managing Director, Surface Transport

13 August 2015

Crossrail

1.0 Introduction

This letter documents the status of the Health, Safety and Environment and the Resilience Assurance process for Crossrail Limited (CRL) as at 8th June 2015.

CRL is managing 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 and 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; CRL has a clear policy on resilience arrangements, with arrangements aligned. Both policies are communicated to all employees.

Description: In 2014 CRL published new Policies for Business Continuity and Environmental requirements applicable to all aspects of the CRL Programme. Implementation of these policies within the CRL team is through the CRL Management System while implementation by suppliers and industry partners is achieved through contracts and agreements developed by the CRL Team in accordance with the Management System.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: These CRL 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, CRL reviews relevant legislation to maintain Legal and Other Requirements registers for H&S and Environmental requirements. These registers are maintained in accordance with the CRL Management and Assurance Systems.

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

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

CRL 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 CRL management systems are developed in accordance with the requirements of the relevant international standards. The BCMS is embedded into the CRL 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: CRL'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 CRL staff with HSE roles are assessed against a training needs matrix which identifies minimum requirements for these roles. Training is supplied to address any identified gaps. The H&S Directorate periodically reviews the procedures and provides technical support to teams delivering on training requirements.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: CRL has a programme of exercises involving the CRL Team and industry partners to test their emergency response plans and procedures. This programme will be reviewed and new objectives have been identified for the 2015/16 programme. Business continuity training for key staff in the CRL Team is run alongside the exercise programme. Training is delivered across the project in conjunction with a variety of related 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: CRL 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 H&S Directorate in accordance with the CRL management system to measure the effectiveness of controls and outcomes and in turn feed into reports. The CRL Health and Safety Performance Index (HSPI) identifies HSE performance across CRL 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 assessments is in place to ensure all risks are identified and reduced to ALARP (as low as reasonably practicable) through implementation of control measures and on-going review.

Description: CRL 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 CRL 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 CRL 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 work is carried in such a way as to ensure that HSE and Resilience is included in all activities that are undertaken.

Description: A process of hazard identification, risk assessment and controls is part of the CRL planning process as per point 2.6. This process focuses on the most 'important' risks concerning activities staff and others who come in contact with the CRL programme may face. It

is recognised that hazards will change as the CRL 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, (CRL 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.

CRL 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 CRL. 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. Changes will only be made when these risks are clearly understood; they will have been analysed, assessed, through the appropriate consultation process and (where there is a control plan in place) monitored.

Description: CRL 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 BCMS 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 CRL Procurement Code which defines the procurement processes needed to enable CRL to purchase required goods and services. 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: CRL HSE and Business Continuity have scheduled meetings at all levels of the CRL Programme including contractors and Industry Partners to develop initiatives, share best practice and review performance. In addition to meetings, CRL 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 CRL 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 CRL 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 CRL Incident Management Plan covers all activities within the CRL 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, CRL directors from across the CRL organisation, who can provide comprehensive support to a contractor experiencing an emergency. CRL has further developed its BCMS 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 BCMS 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 effectively.

Description: As part of its commitment to an effective and embedded BCMS, CRL 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 CRL 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, audits and the review of incident investigation outcomes. An annual programme is in place to collate this information and provide an overall and consolidated picture to senior management.

Description: The CRL Health and Safety Assurance Procedure covers the activities of CRL, management of interfaces with Industry Partners and the monitoring of contractors as required by the Construction (Design and Management) Regulations 2015. The arrangement for undertaking this monitoring is set out in the health and safety assurance plan. This plan details the schedule of H&S audits covering defined topics per period. The findings of these audits 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 Head of Health and Safety Assurance in consultation with the Health & Safety Director.

A schedule of HSE and Facilities inspections are undertaken to ensure the safety and wellbeing of CRL employees and to protect the environment on sites where CRL staff are working or CRL 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 CRL 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.

**Andrew Wolstenholme OBE
Chief Executive, Crossrail Ltd**

8 June 2015

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) to the end of March 2015. 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: A specific HSE Policy Statement has been adopted for Specialist Directorates of TfL 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.

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

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: No specific measures are planned for 2015/16.

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.

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 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.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: The Resilience Planning Team will continue to work with the London Resilience Team in 2015/16 to identify resources required of TfL early in the business planning cycle to ensure that TfL fully supports pan London resilience activities.

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. Resilience and business continuity plans exist and are reviewed and updated on a regular basis. During 2014/15 the roll out of the integrated TfL Management System strengthened processes and procedures within Specialist services Directorates.

HSE Status: Implemented
Resilience Status: Implemented

Development Activities: The integrated TfL Management System will be further embedded within Specialist Services Directorates during 2015/16.

Resilience and business continuity plans will be reviewed regularly with a business scorecard being used to advise senior management within Specialist Services of the current status of the plans.

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 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.

“Managing Essentials”, a pan-TfL training programme to raise managers’ competence, including HSE competence, is in place and is being applied within Specialist Services.

HSE Status: In Place

Resilience Status: In Place

Development Activities:

Managers with people management responsibilities have a performance objective during 2015/16 to complete ‘Managing Essentials’ which includes two HSE Modules, covering Health, Safety and Environment and Health and Wellbeing.

The Resilience Planning 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.

A programme to deliver in house Silver (Tactical) Events and Incident Manager and Gold (Strategic) Manager courses is being developed for delivering in the next financial year.

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 office environment, formalised Health and Safety objectives and targets have not yet been set. However risks are

adequately controlled through planned preventative maintenance, statutory testing and Planned General Inspections.

HSE Status: Under Development
Resilience Status: In Place

Development Activities: It is proposed to develop appropriate objectives and targets in 2015/16 and to ensure that all Support Services areas have reports on HSE performance. This action is continued from 2014/15.

Resilience activities are grouped into work streams and a resilience scorecard is being developed to include performance indicators and progress against identified targets in 2015/16.

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: The Corporate HSE team will monitor people manager completion of Managing Essentials HSE Modules.

The Resilience Planning team is working with the key risk representative to review catastrophic, 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 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

embedded into the business during 2014/15.

HSE Status: In place

Resilience Status: In place

Development Activities:

Pathway was introduced in January 2013. In 2015/16 a fundamental review is being undertaken to ensure that it fully supports effective programme and project delivery. This review will include consideration of the Health, Safety and Environmental elements of Pathway.

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:

Description: Change management and control is undertaken in line with business process management.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities:

No specific activity is planned for 2015/16.

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. During 2014/15 a standardised pan-TfL question set for HSE aspects

of procurement was developed.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities:

In 2015 /16 the instructions and guidance material enabling effective procurement, including HSE considerations, is being enhanced and made easier to find and use on the TfL intranet.

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

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: A management system is in place for reporting and investigating incidents, with support from the specialist HSE resource.

The company has 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.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities:

During 2015/16 a new pan-TfL HSE Incident Reporting System will be introduced.

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 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.

HSE Status: Implemented

Resilience Status: Implemented

Development Activities:

Contingency and emergency plans are being reviewed in 2015/16.

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.

There is a resilience exercise guidance document available on the TfL intranet, 'Source'. The programme of resilience and business recovery exercises is reviewed at the monthly Gold Support meeting.

HSE Status: Implemented

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: HSE 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. The HSE audit programme is reviewed and agreed by senior 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.

During 2014/15 audit planning and delivery was further developed to focus on key risks and controls.

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

Development Activities: The 2015/16 Audit Plan has greater focus upon Health and Safety topics as part of the programme of audits.

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 HSE processes to ensure they are as effective and efficient as possible using the lean – six sigma technique was started. This is being widened in 2015/16.

**Howard Carter,
TfL General Counsel**

24 August 2015