

TRANSPORT FOR LONDON

SAFETY, HEALTH AND ENVIRONMENT COMMITTEE

SUBJECT: ANNUAL HSE ASSURANCE LETTERS

DATE: 22 JULY 2009

1 PURPOSE AND DECISION REQUIRED

- 1.1 To inform members of the status of the Health, Safety and Environmental Management Systems (HSEMSs) in the Modes at the conclusion of 2008/09 as reflected in the HSE Assurance letters. The Committee is requested to note the content of the HSE Assurance Letters.

2 BACKGROUND

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

3 INFORMATION

- 3.1 The 2008/09 Health, Safety and Environment Assurance Letters from each of the Modes are attached as appendices:

Appendix 1	London Underground
Appendix 2	Surface Transport
Appendix 3	London Rail
Appendix 4	Crossrail
Appendix 5	Corporate Directorates

4 RECOMMENDATION

- 4.1 The Safety, Health and Environment Committee are asked to NOTE the Modal HSE Assurance Letters.

5 CONTACT

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Transport for London

LONDON UNDERGROUND

Subject: Health Safety and Environment Assurance Letter for London Underground and Metronet Rail companies

Date: 20 May 2009

1. Introduction

This Letter documents the status of the Health, Safety and Environmental Management System for London Underground (LU) and the former Metronet Rail (MR) companies at the end of 2008/09.

2. Status of Health Safety and Environment Management System(s)

2.1 Health Safety and Environment (HSE) Policy

LU has adopted a Health, Safety and Environmental Policy that mirrors the TfL HSE Policy. This policy was endorsed by the LU Board and came into effect in January 2007. MR operated in accordance with its own HSE policy throughout the year.

The policy is available on the LU intranet, is contained within the Safety Certification and Authorisation documentation required by the Railways and Other Guided Transportation Systems (Safety) Regulations (ROGS) and is on display on notice boards in all LU stations, depots, offices and other premises. The LU HSE Policy will be re-issued in July 2009 and will cover the former MR activities.

2.2 HSE Management Systems

The LU Health, Safety and Environmental Management System (HSEMS) is fully implemented. The LU HSEMS and the relevant standards and procedures within it cover LU and its business activities (pre-integration with former Metronet companies) and are in accordance with the criteria within the TfL Group HS&E Management System. Compliance with LU HSEMS across the business is monitored through a structured audit programme. The former Metronet Companies and their business activities are covered by an integrated Management System which covers health, safety, environment and quality. The standards and procedures in MR's management system are dictated by LU's Category One Standards and procedures.

In 2006 the LU HSEMS was subject to a comprehensive review in accordance with LU standards. The recommendations arising from the review have been addressed as part of a programme of improvements. In 2009/10, the LU and MR HSEMSs will be merged into one system.

2.3 Management Competence

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

LU has established and implemented a range of internal health and safety training courses for junior, middle and senior management/directors. The emphasis in respect of these courses is on those managers whose roles have the greatest impact on risk in the LU operational environment. In 2009/10, the arrangements for the former MR managers will be aligned with those of LU as further changes are made in the overall LU organisation structure related to the operating cost review.

2.4 HSE Objectives / Key Performance Indicators (KPIs)

LU has had a comprehensive improvement programme in respect of health, safety and environment over the last year. These programmes are developed on an annual basis and the 2008/09 programme, which builds on from previous programmes, was endorsed by the LU Health, Safety and Environment Committee in May 2008. The detailed project delivery plans, milestones and accountable managers were entered on the LU Safety Action Tracking System (LUSATS). This makes the status of actions highly visible and these actions are the subject of on-going monitoring and review.

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

Similar and complementary objectives, performance indicators and improvement programmes were pursued in MR as these arrangements are mandated via LU Category One Standards. In 2009/10, these complementary arrangements will be systematically merged.

2.5 Risk Assessments

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

LU standards require that our risk assessments are subject to thorough review periodically, at times of change and following significant events, as appropriate. Our on-going programme of review has been adhered to. In this way we ensure that our health and safety risks are maintained at levels that are as low as reasonably practicable.

Similar arrangements for employee related risk assessments were maintained in MR during the year and will be aligned with LU arrangements during 2009/10.

2.6 Meetings and Consultations

The LU Health, Safety and Environment Committee (of the LU Board) met on a quarterly basis in 2008/09. The Committee is chaired by the Director of Safety with members drawn from LU Directors and senior management representatives. Tube Lines and the former Metronet Companies have standing invitations for their Managing Directors and Safety Directors as non-members, the latter attend on a regular basis.

The above committee has been supported by the LU Directors' Assurance Review Team (DART) in order to provide an effective peer review function. Meetings were held at least every 4 weeks in 2008/09, and special meetings were held when necessary. The remit of the Group encompasses the peer review/validation of change where this has a significant health and safety implications, peer review of all Formal Investigation Report recommendations and actions in advance of their implementation and overseeing the tracking and completion of safety improvement in LUSATS.

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

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

Similar arrangements for review of HSE matters and for employee consultation were maintained in MR during the year and will be aligned with LU arrangements during 2009/10.

2.7 Incident Reporting and Investigation

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

LU has a dedicated incident investigation team which investigates significant incidents. The team can also call on a number of safety managers/advisers and engineers trained in specialist investigation techniques. All Formal Investigation Reports (FIRs) issued over the past year have been subject to peer review by the LU DART. Corrective actions and programme details/accountabilities were entered onto LUSATS and have been/are being monitored through to completion. Progress with the implementation of the recommendations from FIRs in respect of the most serious incidents is reviewed at the HSEC.

Similar incident reporting and investigation arrangements were maintained in MR as these are mandated via LU Category One Standards. In 2009/10, the LU arrangements will apply across all areas.

2.8 Assuring HSE Performance

LU has established and implemented standards and processes for the audit of the LU HSEMS. LU's standards require that the audit plan is risk-based and the programme is developed against set criteria and subject to wide consultation in draft before approval. The SQE and technical audit programme for 2008/09 was approved by the LU HSEC and covered key LU health, safety and environment processes, operational risk controls and specific topic areas. The audit programme also covers LU's PPP and other suppliers.

Audit results and actions have been reported in specific audit reports and in the quarterly LU Health, Safety and Environmental Performance reports. Progress against the programme is monitored regularly and reported to senior management. Audit reports are communicated to the audited section of the business and relevant senior management. Audit re-visits are undertaken to ensure that actions have been progressed.

In addition to audit work undertaken via SQE, a programme of HS&E System Checks is carried out across LU as part of local management assurance checks.

Similar and complementary assurance processes were maintained in MR as these arrangements are mandated via LU Category One Standards. In 2009/10, these complementary arrangements will be systematically merged.

2.9 Procurement Management

The majority of LU's major suppliers have been procured via our PPP and PFI arrangements, and as such, have been subject to an extremely thorough evaluation process in terms of overall capability including health, safety and environmental aspects. These are supported by robust contractual provisions relating to health, safety and environmental management.

For non-PPP/PFI suppliers, including the PPP Suppliers supply chain, LU has implemented procurement standards and processes that ensure suppliers meet our health, safety and environment requirements at all stages of the procurement process. Compliance with these standards and HSE risks are managed throughout the procurement process. Verification of higher risk activities are managed through LU's Assurance process, on site monitoring and performance reporting.

Similar procurement management arrangements were pursued in MR as these arrangements are mandated via LU Category One Standards. In 2009/10, these complementary arrangements will be systematically merged.

2.10 Review of the Management System

LU has established and implemented a standard for the review of the adequacy and effectiveness of the LU HSEMS, and related arrangements, that have the potential to affect health, safety and environment. The LU HSEMS was subject to a full review in 2006. The next review is due in 2009.

In between formal reviews, individual elements of the system have been subject to review in response to legislative changes or other events. Such changes have been controlled through the LU standards regime change management provisions.

MR's HSE management system was reviewed during the year and work started on merging it with the LU HSEMS on which it is based. The work of moving to one system will be completed in 2009/10.

3. Future HSEMS Developments

As part of the ongoing review and development of the LU HSEMS, a number of significant improvement actions are scheduled for this year. LU has a commitment to continuous improvement in health, safety and environmental management and performance. This means that LU is continuously considering how performance can be improved. This is achieved through the respective health, safety and environmental improvement programmes each year. These programmes are endorsed by the LU Health, Safety and Environment Committee and progress is monitored and reviewed throughout the year.

Detailed health, safety and environmental improvement programmes are available on the LU intranet.

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

- Development and launch of Phase 1 of the new Company Management System which will incorporate HSEMs requirements for the operational railway.
- SQE Management System Alignment Project to integrate LU and the former MR HSE systems will be completed
- Ongoing review and updating of our top event major accident hazard risk models
- Continued implementation of the safety critical communications programme.
- Review and development of accident precursors
- Improving mental and musculo-skeletal health
- Early interventions to encourage early return to work for people who are off sick
- Environmental improvement actions including improving recycling at our operational sites, improving and integrating environmental training into our training programmes, raising awareness of the access the Tube provides to green spaces across London and analysis of rolling stock design which could deliver traction energy efficiencies.

Richard Parry
Managing Director, London Underground

Transport for London

SURFACE TRANSPORT

Subject: Health Safety and Environment Assurance Letter for Surface Transport

Date: 1 May 2009

1. Introduction

This Letter documents the status of the Health, Safety and Environmental Management System (HSEMS) for Surface Transport at the end of 31 March 2009.

2. Status of Health Safety and Environment Management System(s)

2.1 Health Safety and Environment (HSE) Policy

The TfL Group HSE Policy statement, amended August 2006 (reviewed March 2008), has been adopted by Surface Transport. In order to promote greater local ownership, the policy, where applicable, has been branded to individual mode/directorate and authorised at that level. The policy statement has been made generally available to all staff via the TfL intranet, notice boards and in health and safety training.

2.2 HSE Management Systems

In the areas of Surface Transport covered by the Streets directorate HSEMS, the implementation of systems ranges from “*in place*”^{*} (Human Resources, Strategy and Finance) to “*Implemented in full*” in all other areas. These systems were independently audited by the Royal Society for the Prevention of Accidents (RoSPA) in the year.

HSEMSs for operational public transport modes/directorates (outside of Streets directorates) are based upon individual modal requirements. Programmes of work to update these existing safety management systems and to integrate environmental procedures at operational modes/directorates are currently in place to ensure a status of ‘*Implemented*’^{*} is attained across in these areas by the end of October 2009.

Surface Transport continues to be compliant with core legislation and maintains the established governance arrangements to ensure legal compliance.

(*Group HS&E definitions: - ‘*In place*’ refers to documented process and standards that have not yet been implemented in entirety.

'implemented' where all processes are documented and are being complied with: 'implemented in full' taken to mean documented processes complied with by management with active monitoring, audit and review arrangements)

2.3 **Management Competence**

London Buses and London Streets Organisation and Arrangements (O&A) documents describe the health, safety and environment roles and responsibilities of managers and staff. The roles and responsibilities are further enhanced through the HSEMS procedures, which outline individual responsibilities enabling specific functions to be achieved safely. The O&A for Surface Transport is currently under review following organisational change.

Dedicated Safety Managers are actively involved in the organisation of a range of health and safety training comprising induction, general risk assessment, personal safety, defensive driving, accident investigation and role specific training e.g. CDM.

Environmental awareness training is planned as part of the roll-out programme for the HSEMS.

2.4 **HSE Objectives / Key Performance Indicators (KPIs)**

Health and safety objectives are set and reviewed annually at two levels; as part of the Operations directorates' service delivery planning process and at modal/directorate level using an agreed template.

All directorates with significant risks, have health and safety objectives that are signed off and monitored at local safety governance meetings. Performance against agreed objectives is reported to the Safety Health and Environment Committee (SHEC).

Bus safety KPIs are reported as part of a periodic strategic report to ST directors and health and safety KPIs for staff and contractor incidents are reported quarterly to SHEC and monitored at the Surface Transport Strategy Board Meetings.

Bus incident statistics are benchmarked for large bus operators and are reviewed by TfL and bus company directors at a quarterly Bus Operator Forum (Safety Sub Group).

It is intended that the use of leading KPIs for the measurement and evaluation of health and safety performance be adopted for SHEC reporting.

Analysis of road casualty data are used in assessing progress against meeting London's Road Safety Plan which supports the national casualty reduction targets set for 2010. Performance against these targets is published on the TfL website.

Data continues to be collected to provide performance information against TfL's Environmental KPIs and reported through the annual Environment Report.

2.5 Risk Assessments

Programmes of risk assessments covering activities, sites and fire are in place across Surface Transport and assessments are monitored and reviewed under existing guidelines. These arrangements are helping to reduce Surface Transport risks to ALARP (as low as reasonably practicable).

Where applicable, risk assessment procedures are being revised as part of the ongoing HSEMS update and risk assessment training is being carried out in some modes allowing greater local risk management.

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

2.6 Meetings and Consultations

Health, safety and environmental matters are discussed at the highest levels within the Surface Transport governance structure. Periodic reports are submitted to facilitate informed HSE planning at strategic level.

Specific modes/directorates Health Safety and Environmental Governance Meetings exist, providing the opportunity to ensure that HSE matters and performance are systematically monitored.

In some modes, environmental issues are incorporated in the health and safety governance meeting otherwise separate governance meetings are in place to reflect the level of input required.

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

Safety Committees are active in operational modes and arrangements are being finalised with employee representatives for a Surface-wide safety committee for non operational staff.

2.7 Incident Reporting and Investigation

Surface Transport HSEMS procedures include for the reporting and investigation of accidents/incidents to staff and for the reporting and investigation of major incidents as defined by the Group Health, Safety and Environment standard.

Surface Transport undertook an initiative to replace the existing bus operator incident reporting system with a web-based solution. The system offers opportunities for application in other areas of the organisation. The new system will go live in the summer of 2009.

Arrangements are in place for identifying and sharing the root causes of major incidents on the bus network. These are reviewed at a quarterly Bus Operator Forum (Safety Sub Group).

Surface Transport has competent accident investigators following the completion of a programme of training provided by the Institute of Industrial Accident Investigators.

Accident/incident data are monitored at modal/directorate health and safety committee/governance meetings and at a four weekly Strategy Board Meetings and quarterly SHEC meetings.

2.8 Assuring HSE Performance

Assurance of HSE continues to be undertaken across the modes/directorates, through a combination of planned general inspections, operational inspections, independent audits and physical condition surveys.

Independent audits of Streets' HSEMS are carried by RoSPA. The intention is to extend this arrangement to other Surface Transport areas, once HSEMS are *"implemented"*.

Each mode/directorate reports HSE performance information via scheduled HSE governance meetings. HSE is also reviewed by Surface Transport Directors at the Strategy Board Meetings with a report submitted by the Operations Director and quarterly to SHEC.

2.9 Procurement Management

Health and safety forms part of the evaluation criteria for all contractors applying for inclusion on the London Streets approved list. Contractors in the Streets area are checked against the Contractors Health and Safety Assessment Scheme (CHAS), a national assessment scheme. CHAS has recently introduced environmental criteria which are expected to be adopted as part of the Responsible Procurement programme.

For major contracts such as the procurement of Cycle Hire Scheme and infrastructure, health, safety and environmental expertise is provided directly to the project team.

2.10 Actions from review of Management System

The work to develop and implement the HSEMS for operational areas continues. Line management and HSE advisor peer review arrangements are in place to ensure the procedures issued are suitable and sufficient.

Independent audits of the health and safety elements of the Streets HSEMS are undertaken on a bi-annual basis. A review of the management system is carried out annually through the Group Assurance Letter process. The findings from all processes are actioned and monitored through Directorate Health and Safety Committees, the London Streets H&S Consultative Committee and COO meetings. Formal processes for the review of environmental elements of the management system have being developed and implemented in co-ordination with the H&S process.

3. Future HSE MS Developments

As part of the ongoing review and development of HSEMS, feedback from audit and assurance processes, major incidents investigations and trend analysis are being incorporated revised procedures. Progress of the reviews are agenda items at appropriate HSE governance meetings.

MD's SIGNATURE:

DATE:

Transport for London

London Rail

Subject: Health Safety and Environment Assurance Letter for London Rail Modes

Date: 15 May 2009

1. Introduction

This Letter documents the status of the Health, Safety and Environmental Management System for London Rail Modes at the end of April 2009.

2. Status of Health Safety and Environment Management System(s)

2.1 Health Safety and Environment (HSE) Policy

The TfL Group HSE Policy has been adopted or a business specific HSE policy, aligned with the Group HSE policy, has been developed and communicated to all employees.

London Rail has adopted the TfL Health, Safety and Environmental Policy. London Rail reviewed this policy, along with the other modes in February 2008 and it remains in place unchanged. The policy is widely available on the TfL Intranet. It is also on display on Health and Safety notice boards throughout our offices.

2.2 HSE Management Systems

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

London Rail is made up of three separate modes, London Overground, Docklands Light Railway and Croydon Tramlink. The transport services themselves are delivered by Private Sector contractors. In each unit there is a management system covering the TfL operations, backed up in the case of DLR (and being developed for part of the new East London Line, for Overground Infrastructure and Operations), by Safety Authorisation documentation assessed by ORR, with complementary safety management systems set out in formal Safety Certification for the contractor operators, this documentation is also assessed by ORR. The DLR framework has been significantly revised during the year, and is now an integrated management system which has been briefed out to staff and is operating. The system in Trams is still being revised, with the aim of implementing an integrated system for August 2009

2.3 **Management Competence**

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

Job Descriptions summarise the key HSE competencies for specific employees. London Rail is looking to develop the TfL HSE competency framework over the next year.

Currently all modes within London Rail are at different levels of maturity with regards to HSE competence management arrangements. London Overground Infrastructure has a fully implemented system that operates within it's construction environment. London Overground Operations, Docklands Light Railway and London Tramlink have systems in place to identify and manage the competency of safety critical employees.

2.4 **HSE Objectives / Key Performance Indicators (KPIs)**

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

On DLRL the annual Health Safety and Environmental Plan's objectives for year 2008/09 were successfully achieved. The periodicity of future plans has been altered to correspond with the report reporting period required by the Office of Rail Regulation under the Railways and Other Guided Transport Systems (Safety) Regulations 2006 i.e. to calendar year. The 2009 plan is now in force and all objectives are on target. Safety Performance of DLRL's Principal Contractors is monitored through actual performance and predictive performance indicators.

Objectives and KPIs are under development for London Overground Operations and Infrastructure and London Tramlink.

2.5 **Risk Assessments**

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

Programmes of risk assessments are fully developed in London Overground Operations and Infrastructure and Docklands Light Railway.

London Tramlings risk assessment programme is currently under development.

2.6 Meetings and Consultations

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

A schedule of meetings for HSE review and consultation are fully developed in London Overground Operations and Infrastructure and Docklands Light Railway. Arrangements are also in place in London Tramlink but still need to be fully implemented.

In addition to the TfL London Rail arrangements, our operating contractors also have consultation arrangements in place.

2.7 Incident Reporting and Investigation

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

Arrangements for reporting and investigation are fully developed in London Overground Operations and Infrastructure and Docklands Light Railway. Arrangements are in place at London Tramlink but are under review with partner organizations.

2.8 Assuring HSE Performance

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

The arrangements for an annual HSE audit programme and effective monitoring by management are fully developed in London Overground Operations and Infrastructure and Docklands Light Railway. At London Tramlink the annual audit programme is under development and will roll out in the second half of 2009/10.

2.9 Procurement Management

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

London Overground Operations and Infrastructure and Docklands Light Railway have fully developed arrangements in place with regards to HSE in procurement management. In London Tramlink arrangements are also in place but still need to be fully implemented.

2.10 Review of the Management System

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

London Overground Operations and Infrastructure and Docklands Light Railway have fully developed arrangements in place with regards to Review of the Management System. In London Tramlink the Integrated Management System is in development and includes the requirement for review.

3. Future HSE MS Developments

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

DLR:

- The development and introduction of a revised DLR wide Change Management process to include all companies within the DLR family.
- The development and introduction of a formal Competence Management system.
- The introduction of an Enterprise Risk Management System.

London Overground:

- The roll out of revised management system arrangements to take account of new responsibilities of the 'core route' when the East London Line reopens.

London Tramlink:

- The implementation of the Integrated Management System and all safety critical procedures and processes to replace the previous system
- Commencement of a rolling programme of HSE audits.

Ian Brown
Managing Director
London Rail

Crossrail Limited**Transport for London**

Subject: Health Safety and Environment Assurance Letter for Crossrail Limited (CRL)

Date: 28 April 2009

1. Introduction

This Letter documents the status of the Health, Safety and Environmental Management System for CRL at the end of April 2009.

2. Status of Health Safety and Environment Management System(s)

The Health, Safety and Environmental Management Systems have been reviewed against the TfL policies and procedures and the findings are part of the current review being undertaken with the arrival of the Programme and Delivery Partners.

2.1 Health Safety and Environment (HSE) Policy

The TfL Group HSE Policy has been adopted by the CRL Board and a supporting project specific HSE policy, aligned with the Group HSE policy, has been agreed at the March CRL Executive Committee and communicated to all employees.

2.2 HSE Management Systems

The Management System standards, policies and guidance documents are all currently undergoing a full review as part of an initiative to ensure they meet the requirements of the Programme and Delivery Partners and also as part of a drive to integrate into HSQE systems. A final check will take place to ensure documents still meet the requirements of TfL.

2.3 Management Competence

CRL are currently reviewing the competence process and requirements as part of the overall review of the CRL Management process. During this review competence levels and training requirements will be defined and standards created. The TfL Competency model will be utilised.

2.4 HSE Objectives / Key Performance Indicators (KPIs)

CRL 2009/10 Health and Safety Objectives were agreed in April. These objectives have been checked against the TfL objectives. There are

monitored by the CRL Board and in the health and safety sub-committee on a regular basis.

2.5 Risk Assessments

CRL's Strategic Risk Management Plan (SRMP) defines CRL proposed arrangements for the overall management of project risk, covering cost, programme and organisational risks.

The SRMP has established five core work-streams, and their associated key work activities as the main framework for review of strategic risk and uncertainty; each having the ability to influence the project's outcomes.

The five core work-streams constituting Level 1 of the Risk Hierarchy are Sponsorship, Railway Services, Engineering & Construction, Legal & Commercial and Programme Management.

2.6 Meetings and Consultations

Crossrail has an integrated process for communications that includes Health, Safety, Environment and Security. The Strategic Health and Safety Management Plan maps out all CRL meetings and how they interface with regard to H&S. The Health and Safety manual gives details of the terms of reference and function of all the health and safety meetings.

2.7 Incident Reporting and Investigation

Crossrail have drafted both an Emergency Management process and an Accident and Incident Investigation process and are awaiting the arrival of the Delivery and Programme partners to allow their input and comments to the systems before they are presented to the CRL Board for approval.

2.8 Assuring HSE Performance

The annual audit programme has been agreed by the Board. The plan that has been created is an integrated plan that covers all areas except finance, which has its own specific audit plan.

2.9 Procurement Management

CRL ensure the TfL requirements have been adhered to through the Health and Safety in Supply Chain Management process. CRL are further ensuring this process is meeting both CRL and TfL requirements, and in a drive to improve the process, by undertaking a review of the Supply Chain Management process and incorporating it within existing procurement processes. During this review the TfL requirements will be reviewed again to further ensure CRL compliance.

2.10 Review of the HSE Management System

The suitability of the HSE Management System is continually reviewed through the CRL audit programme. A full review will be completed when the Delivery Partner and Programme Partner are on board. All new systems will be designed to established international standards and will follow an appropriate review mechanism.

3. Future HSE MS Developments

The following improvements to the HSE Management System over the coming year are:

- Integration of the Health and Safety, Quality and Environmental systems into a HSQE management system.
- Review the Management System against the requirements of the new programme and delivery partners
- Undertake a compliance review against TfL standards.

MD's SIGNATURE AND DATE

Transport for London

TfL Corporate Directorates

Subject: Health Safety and Environment Assurance Letter for TfL Corporate Directorates

Date: April 2009

1. Introduction

This Letter documents the status of the Health, Safety and Environmental Management System for the TfL Corporate Directorates at the end of March 2009. The Corporate Directorates (Finance, General Counsel, Marketing and Communications and Planning) were restructured during 2008/09. This Letter follows the modified organisational structure. Section 2 of the Letter addresses the generic HSE matters that are common to all Directorates, Section 3 identifies planned improvements to generic HSE matters and Section 4 addresses those HSE matters that are the specific responsibility of individual Directorates.

2. Status of Health Safety and Environment Management System

2.1 Health Safety and Environment (HSE) Policy

The TfL Group Health, Safety and Environment Policy Statement was reviewed in March 2008. It is available on notice boards and via the intranet. The Policy Statement is provided to new employees as part of the Corporate Induction.

2.2 HSE Management Systems

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

2.3 Management Competence

A Group HSE Competence Framework was finalised during 2008/9. Corporate Directorates HSE is currently performing a gap analysis against the requirements and will implement a programme to address areas that require improvement during 2009/10.

2.4 HSE Objectives / Key Performance Indicators (KPIs)

KPIs, including injury rates and sickness absence are monitored and reported through the Business Management Review process and to the Safety Health and Environment Committee (SHEC) through Quarterly and Year-End reports.

2.5 Risk Assessments

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

2.6 Meetings and Consultations

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

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

2.7 Incident Reporting and Investigation

Accidents are recorded in accident books. Additionally, to aid real-time reactive measurement, HSEMS Standards require that an electronic Accident and Incident Report be completed and emailed to the Corporate HSE Advisor. Compliance with electronic reporting continues to improve and the objective remains to maximise electronic reporting. Investigations of incidents take place as required under HSEMS Standards and actions are closed out in an auditable manner.

2.8 Assuring HSE Performance

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

An HSE Assurance Letter is completed annually and provided to the Commissioner and Safety, Health and Environment Committee.

2.9 Procurement Management

Goods, Works and Services are procured in compliance with TfL Procurement Policy and processes. Compliance with all applicable health and safety legislation is a standard, contractual requirement. A programme of common contract clauses on environmental issues, with guidelines for their use is currently being developed.

2.10 Review of the Management System

The Corporate Directorate HSEMS contains a Standard that requires the HSEMS to be reviewed against the requirements of the TfL Group HSEMS and to ensure it continues to meet the needs of the Corporate Directorates. The next review is scheduled for 2009. Group HSE is responsible for ensuring that findings from the review are incorporated into the Corporate Directorate HSEMS. In addition, reviews of elements of the HSEMS are undertaken as necessary to address legislative change, to meet best practice and to improve future HSE performance.

3. Future HSE MS Developments

As part of the ongoing review and development of HSEMS, a number of improvement actions are to be taken forward during 2009/10:

- Using outputs from the TfL Group HSE Competency Framework, a gap analysis will be undertaken to develop a training programme that addresses identified HSE competency requirements
- HSE Consultation arrangements will be rolled out across Corporate Directorates to an agreed structure
- Necessary HSE input will be made to the planning and implementation stages of organisational change
- HSE intranet pages relating to Corporate Directorates HSEMS will be updated
- Appropriate HSE input will be delivered at identified stages of the procurement lifecycle in conformance with TfL HSE Procurement Guidelines and the TfL HSE Impact Procurement Process Model.

4. Corporate Directorate 'Specific' HSE Responsibilities

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

4.1 Marketing & Comms Directorate 'Specific' HSE Responsibilities

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

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

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

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

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

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

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

Group Customer Services provides the lead 'information' interface with external customers using TfL modes of travel. It communicates real-time travel information to incorporate any required safety element - electronically, via contact centres (at Travel Information Contact Centre and Oyster Help Desk) and at strategically-located travel information centres. Imparted information addresses individual needs of customers where identified enabling customers using TfL modes of travel to complete their journeys in a safe, economic and time-efficient manner.

Vernon Everitt, Managing Director, Marketing & Comms

4.2 Finance Directorate 'Specific' HSE Responsibilities

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

Ten key business objectives, incorporating strategic environmental goals and targets, are set by Group Business Planning and Performance (GBPP).

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

HSE Objectives are addressed in the business plan.

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

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

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

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

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

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

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

Revised consultation arrangements will be rolled out across Corporate Directorates following final agreement with recognised trade unions during 2009/10.

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

Specific areas addressed include:

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

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

GPF have developed an environmental management system (EMS) which will be implemented during 2009/10.

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

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

Steve Allen
Managing Director, Finance

4.3 General Counsel Directorate 'Specific' HSE Responsibilities

a) Support the development of HSE policy and strategy.

The Group TfL HSE Policy Statement was reviewed in March 2008. The Policy Statement has been communicated to the modal senior managers and adopted as the sole TfL HSE Policy Statement.

The TfL Group HSEMS was agreed by the TfL Board in July 2004, setting a structure for all HSEMS across TfL and implementing the Group HSE Policy. The Corporate Directorates HSEMS has been reviewed against the TfL Group HSEMS as part of an external audit in 2007/08.

Group HSE will continue to lead work to ensure that the agreed HSE Competency Framework is applied across all Modes.

Agreements were made between TfL and Crossrail that ensure it follows the same arrangements for the management and provision of HSE assurance as the existing TfL modes.

Arrangements were made with London Underground to ensure that management and provision of assurance on HSE matters related to Metronet were in place.

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

The primary means of assurance to the Board is through the Safety Health and Environment Committee (SHEC) that addresses TfL HSE performance on behalf of the Board. Group HSE delivers Quarterly and Annual aligned modal HSEMS reports to SHEC detailing incident trends, audit activity, sickness absence and HSEMS status updates. An external audit of the Group HSE MS was completed in 2007/08. The audit recommendations inform the provision of further support to the implementation of the HSE MS. Additionally, from time to time, Internal Audit carries out audits where health and safety themes have arisen within wider audit areas. Specific HSE reviews are also scheduled as part of the Annual Audit Plan where appropriate.

An HSE Assurance Letters process has been developed and implemented by all modes.

A review of HSE Leadership at the Board level in TfL was undertaken in 2008/09 using the Institute of Directors and Health and Safety Commission's 'Leadership Checklist'. It concluded that the TfL Board and SHEC collectively demonstrated compliance with the requirements.

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

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

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

d) Assess compliance with HSE legislation.

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

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

e) Maintain HSE legal support.

TfL Legal provides HSE legal support and training as required.

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

Strategic objectives for HSE are set in the Business Planning Guidelines.

g) Set objectives that are consistent with the mayoral environmental strategies and reviewed annually.

Strategic objectives for health and safety are set by Planning with the support of the Sustainability Unit (situated within Group HSE) which coordinates the setting of environmental objectives.

h) Collate information on the progress against environmental objectives for reporting to SHEC.

Updates on environmental matters are provided to SHEC on a quarterly basis and the annual TfL Environmental Report is prepared and published.

Howard Carter
Managing Director, General Counsel

4.4 Planning 'Specific' HSE Responsibilities

- a) *Ensure HSE matters are fully addressed in the development of the Mayor's Transport Strategy.*

The drafting of a new Mayor's Transport Strategy was delegated to TfL and commenced during the year under Planning's leadership. There is a 'Guiding principle – Protecting the Environment' and an identified 'Thematic Outcome - Safety and Security'. Planning has been consulting widely across TfL to ensure that HSE matters are fully addressed in the drafting of the Strategy. An Integrated Impact Assessment is being undertaken on the Strategy and one of the key focus areas for the assessment will be safety.

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

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

Michele Dix
Planning