

London Underground

Change Assurance Plan - live

Title:	Continued safe operation of the London Underground train service through the coronavirus pandemic
Date:	15 July 2021
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Approved by:	Approved by Lilli Matson, TfL Chief Safety, Health & Environment Officer

1. Purpose

- 1.1. This Change Assurance Plan (CAP) sets out the safety considerations, risks assessed and the underpinning strategy that London Underground (LU) will adopt during the continued running of train services and the operation of stations through the coronavirus pandemic.
- 1.2. Key risks and planned mitigation measures have been identified and reference is made to existing line contingency, service, congestion control and network emergency plans.
- 1.3. This CAP and LU's operational plans recognise that the current situation is one where we will need to respond to changes and developments. In response, LU's plans will continue to develop as necessary. This CAP and the risks considered in the appendix will be reviewed on a regular basis as it covers a prolonged period of operation where circumstances and risks are likely to change.
- 1.4. To provide a train service and operate stations, overtime may be worked by staff across several functional areas. This will be managed in line with existing procedures to control risks from excessive hours and fatigue.

2. Introduction and background

- 2.1 The outbreak of the Covid-19 Pandemic continues to affect the London area. From 23 March 2020 when the Government announced lockdown restrictions for the UK, LU operated a significantly reduced train service and closed a number of stations as a result of staff absences. Customer numbers on LU reduced at that time by approximately 95% compared to the same time period last year.
- 2.2 On 10 May 2020, the Government set out next steps in managing the pandemic in England.
- 2.3 Plans were put in place to ensure that LU could get London moving and working safely and sustainably, as quickly as possible. LU increased the train service from 18 May 2020 by re-introducing working timetables on most lines, with additional health and safety precautions in place for our colleagues and customers. The operation of the service has considered the customer demand as well as the availability of colleagues, readiness of our assets and the necessary implementation of the additional health and safety precautions required to operate safely. LU increased train service capacity to near normal levels to help maintain social distancing for our customers and staff. Extensive travel demand management and communication measures have also been introduced to manage customer demand at lower levels than normal.

- 2.4 Between May and September 2020 LU saw a steadily increasing customer demand network wide. This was as a result of the re-opening of non-essential retail from 15 June 2020 and the leisure industry from 4 July where an increase in demand was seen at weekends and other off-peak times. A further increase was seen when schools re-opened in September. This most significantly impacted on the fringes of and less congested areas of the LU network.
- 2.5 Throughout this time, while some parts of the LU network continued to experience very few customer numbers, certain locations experienced some congestion and high demand at key times (between 0530 and 0730).
- 2.6 In mid-September 2020 the UK saw an increase in the numbers of confirmed positive cases of COVID-19 reported. As a result, on Saturday 31 October 2020, the Government announced that the UK would move back into lockdown restrictions from Thursday 5 November to Tuesday 2 December. No changes to the control measures in place to manage exposure to COVID-19 were identified as necessary at this time.
- 2.7 On 23 November 2020, the Prime Minister announced that the national lockdown would come to an end as planned and would be replaced with an updated system of three Tiers which was applied regionally according to the conditions in place. It was announced on 26 November that London would enter Tier 2, along with the other local Council areas where London Underground operates. London subsequently moved to Tier 3 on the 16th December, Tier 4 on Sunday 20th December and full lockdown from the 4th January 2021 as a result of increasing COVID transmission due to a new strain of the virus (which is 50-70% more transmissible than the previous strains of the virus) becoming evident. Government requirements were that people should only leave their homes for limited reasons permitted by law, with a national 'stay at home' requirement taking effect. This included a requirement that any travel should remain local and schools, the retail, leisure and entertainment industry were closed. LU saw a reduction in customer demand as a result.
- 2.8 On 22 February 2021 the Government announced a new 'roadmap' outlining the key phases over the next 6 months on the phased lifting of restrictions. The first of these was schools reopening from 8 March 2021. As was seen in September 2020 when schools reopened after the first lockdown there was an increase in customer numbers primarily affecting the fringes and less congested areas of the LU network. When non-essential retail and the leisure industry, including bars and restaurants serving customers from outdoors re-opened from 12 April 2021, there was an increase in demand at weekends and off-peak times. This is in line with what we saw when these industries re-opened in June and July 2020 after the first wave of the pandemic. Customer demand increased again as stage 3 of the government 'roadmap' was implemented from the 17th May 2021. This saw the easing of some limits of social contact outdoors and indoors and included indoor hospitality re-opening (e.g. pubs and restaurants).
- 2.9 On 12 July 2021, the Government announced that England would move into Step 4 of the lifting of COVID related restrictions on 19 July 2021. This includes the removal of social distancing and the legal requirement for face coverings to be worn on public transport. The Prime Minister noted that it is "expected and recommended that people should wear face coverings, unless they're exempt, in crowded, indoor settings like public transport."
- 2.10 LU's goal throughout the pandemic has been to provide a safe environment for our colleagues and our customers. As we move into Step 4, the infection rate in London remains high, so we will not be removing any of our existing controls on 19 July 2021. We will update the TfL Conditions of Carriage to require any customers who travelling on the TfL network to wear a face covering (unless exempt). We will maintain the requirement for colleagues to wear face coverings in the workplace, as well as maintain the requirement for social distancing and our other controls (enhanced cleaning, testing, testing, provision of

hand sanitiser, etc.). These controls have provided a safe working environment for our colleagues and a safe travelling environment for our customers over the past 16 months.

- 2.11 The impact of the Government's announcements on 12 July 2021, and any further changes to Government guidelines, including the publication of transport-specific guidance (which is expected), staff availability and the impact that this has on operations will remain under review in line with our existing arrangements. This risk assessment updated as necessary.
- 2.12 The railway must always operate within an envelope whereby services can meet demand and maintain the safety and wellbeing of colleagues and customers. This document sets out how LU plans do to this in moving to Step 4 of the Government's roadmap.

3. Assessment of risk

- 3.1 Since the initial phases of the COVID-19 pandemic, LU has been operating in line with the guidance issued by the Government and Public Health England (PHE). This has been reviewed regularly by the TfL Occupational Health & Wellbeing Team. Where any changes have been made, TfL guidance has been updated and shared accordingly. LU has also continued to work with other Rail Operators to ensure best practice is shared and that a consistent approach is being taken across the rail industry. As a result, a number of changes to working practices across the network have been introduced to increase the ability for social distancing. Where social distancing has been identified as not possible for some essential tasks a number of changes have been made. This includes providing PPE or face masks to our people in line with the very clear guidance and direction given to us by the Government. We offer PPE to some of our teams in line with Public Health England's advice, for example when dealing with an ill customer who needs urgent attention. These will remain in place in the immediate term following the move into Step 4. Before we make any significant changes to our COVID-19 controls, we will carry out appropriate H&S risk assessments and will consider other implementation risks.
- 3.2 From 15 June 2020 the Government made the wearing of face coverings mandatory for customers on trains. On LU this was extended to the wearing of face coverings for customers and staff when in any public facing areas that are not behind a physical barrier. The Government recommended face masks or coverings, but not PPE in these environments. As part of the move to Step 4 on 19 July 2021, the Government is no longer mandating the wearing of face coverings on public transport but has noted that it is "expected and recommended that people should wear face coverings, unless they're exempt, in crowded, indoor settings like public transport." As noted above, we will update the TfL Conditions of Carriage to require any customers who travelling on the TfL network to wear a face covering (unless exempt). We will also maintain the requirement for colleagues to wear face coverings in the workplace This will contribute to how we manage the risk of transmission of the virus to our colleagues and customers, particularly those who may be more vulnerable.
- 3.3 LU will continue to respond and adapt our response as the Government's advice develops in the future. These measures (in addition to operating with lower than normal customer numbers) have enabled LU to manage the associated risks to as low as reasonably practicable.
- 3.4 The overarching risks associated with the continued operation of the train service have been assessed. As part of this assessment consideration has been given to the mitigation measures that have already been implemented to manage risk of exposure to COVID-19 as well as to the additional mitigation measures that will be implemented. Based on these, no significant change in risk levels to customers or colleagues have been identified. The full assessment is included in Appendix 1.

- 3.5 The principles and details as to how train services and stations will be operated shall rely on established processes and procedures. This also applies to Asset Performance & Capital Delivery activities.

4. Train Operations

- 4.1. From 18 May 2020, LU re-introduced working timetables which significantly increased train frequency. Increasing the train service to near normal levels increased available capacity and has enabled social distancing to be more easily maintained across the network. Where a reduced service operates on a line, this has the potential to impact customer services, change customer travel patterns and will, if not effectively mitigated, lead to congestion and crowding and less potential for social distancing to be maintained.
- 4.2. Throughout the COVID-19 pandemic the Government and Public Health England emphasised the importance of applying the 2-metre social distancing guidance where possible. From 4 July 2020, they recommended that this remained the case, however if it could not be maintained then a '1 metre plus' principle should be followed. This meant that with additional mitigation measures in place the risks associated with this are broadly the same as they are at 2-metres. The additional mitigation measures include the wearing face coverings which are in place for staff and customers. This revision did not fundamentally change LU's current approach of trying to maintain social distancing at 2-metres where possible and this remains the case. Where it is not possible, additional steps have been taken to mitigate the risks associated with working / being less than 2 metres. In line with this, and the recognition by the Government that maintaining 2-metre social distancing in a public transport environment may not always be possible the social distancing signage on the network was updated to remove reference to 2-metres and remind customers to social distance and wear face coverings. This also brought the LU network in line with the messaging across other rail operators. Signage for staff facilities has remained the same. These measures will remain in place immediately following the 19 July 2021 when Step 4 of COVID restriction easing comes into effect.
- 4.3. To help improve and continue to maintain social distancing, from April / May 2020 the train service was increased as far as possible specifically to create extra capacity on the network (not to attract more customers). This change was combined with very strong and clear messages to our customers aimed at discouraging them from travelling, unless essential. This messaging then changed from 1 August 2020 in line with the latest Government guidance. We no longer told people to only use public transport for essential purposes and we removed any messaging intended to discourage customers as we did at the start of the pandemic. A TfL Go App was also launched to support this change in messaging. It has allowed customers to better plan their journeys to enable social distancing.
- 4.4. Due to the movement of London firstly into the new Tier 4 restrictions and from the 4 January 2021 to full lockdown, as a result of the increase in COVID-19 cases across the country, Government messaging focussed on requiring people to stay at home except for specific purposes. The restrictions introduced from this date included working from home where this is possible, avoiding travel where possible and the closure of the leisure & entertainment industry and non-essential retail. As part of the Government 4 step plan to move out of lockdown, the 'stay at home message was lifted' on 29 March 2021 and the 'Rule of 6' outdoors was re-introduced, and outdoor sports facilities reopened. The Government rules changed again on 12 April 2021 and non-essential retail and the leisure industry was allowed to re-open. The next step occurred on 17 May 2021 with cinemas, theatres and sports grounds reopening with some restrictions still in place, and for hospitality venues to allow customers inside their premises.
- 4.5. Step 4 of the COVID roadmap will be implemented in England on the 19 July 2021. This will see most of the measures implemented throughout the pandemic lifted including removing all legal limits on social contact and the reopening of all business activities and events

including nightclubs. The rollout of the vaccine and reduction in the potential for serious illness to those vaccinated has enabled this.

- 4.6. LU has a detailed Recovery plan which has been developed in response to the operational situation as it evolves. Each line has a plan in place which details the service that will be operated. These plans combined form the basis of the COVID-19 operational plan.
- 4.7. The LU Network Operational Event & Response Plan, STEPPED EASING OF PANDEMIC RESTRICTIONS “STEP 3” that has been effective from 17 May 2021, will be withdrawn from Start of Traffic on Monday 19 July 2021. This plan will not be replaced with a further network plan. The various iterations of the LU Network Operational Event & Response Plan have invoked Event Plans for Social Distancing, that have set out station specific measures to support our customers maintaining a social distance, coordinated through a pan-network oversight. While the pan-network arrangements will be removed with the withdrawal of the LU Network Operational Event & Response Plan, local managers will maintain existing measures (such as one-way systems, queuing, signs, barriers etc.) that have been introduced on their stations over the course of the pandemic to help to maintain customer flows and reduce crowding and thus support social distancing.
- 4.8. Whilst we continue to aim to operate as full timetables as possible, train services may change (introduced/increased/decreased/withdrawn) throughout the day to reflect any changes to the resources available. Any changes to customer train services will be made by the Service Manager in conjunction with the Senior Operating Officer (SOO).
- 4.9. Where LU is directed by a regulatory authority to close or part close the Underground network, other than in an emergency, for the purposes of this CAP, this shall be assumed to take place at the end of the traffic day in which that direction was made.
- 4.10. Train operations and associated roles (e.g. signalling and service control) will only be undertaken by suitably licensed and competent members of staff who will be able to deal with any incidents which arise as set out in the Rule Book. Trains will only be operated where it is safe to do so.
- 4.11. The consideration of the factors outlined above by the line Service Manager and the SOO will ensure that where reduced train services are run, the risks to customers, staff and contractors will not be significantly changed during this period.

5. Station Operations

- 5.1 LU intends to continue to maximise the number of stations that are open for customers to use. This will help distribute customer demand more evenly across the network, supporting social distancing. Stations will be operated in accordance with the existing Rule Book, with the required number of competent staff.
- 5.2 Stations in open sections have no legal minimum number of staff required to remain open for customer use. Whilst LU intends to staff these stations as normal, there may be stations that are unstaffed due to staff not being available through the impact of COVID-19. This will be managed through existing business as usual arrangements.
- 5.3 Sub-surface stations have an operational minimum as defined by the relevant Congestion Control and Emergency Plan (CCEP) which details arrangements required to safely evacuate the station.
- 5.4 As part of the initial phases of LU’s response to COVID-19, a number of stations were closed indefinitely to ensure that other key interchange stations had the minimum numbers of staff required to operate. As LU changed its service from 18 May 2020, the potential for these stations to re-open in phases was assessed and all have since re-opened except for

Heathrow Terminal 4 which remains closed at the request of the airport. Prior to any being opened to customers again all relevant maintenance activities and inspections were undertaken to ensure that it was safe to do so. The same approach was not taken for the most recent lockdowns with respect to closing stations. The ability to keep stations open, stations prioritised to remain open and the need to close stations remains under review. We have robust systems in place to respond to any issues with staff shortages or other reasons why we might have to close stations.

- 5.5 At all stations across the network, surveys have been completed that have identified social distancing requirements. To manage these requirements, a suite of measures have been implemented (as necessary for that station) including:
- Barriers and one-way systems
 - Signage and floor markings
 - Escalator management arrangements
 - Management of interchanges
 - Triggers to close stations to maintain social distancing
 - BTP engagement
 - Managing queues outside of stations
- 5.6 These will remain in place in the immediate term once England moves into Step 4 on 19 July 2021. The controls will be reviewed, updated and staff briefed as necessary. Where we propose any changes to existing controls, we will consult with the relevant functional council as appropriate.
- 5.7 Lifts and escalators will remain in service at stations where there are lift licensed staff available to operate them. They will be taken out of service where appropriately licensed staff are not available. This will be communicated to customers via the normal methods including public address announcements, social media and the TfL internet.
- 5.8 These arrangements will reduce the network's accessibility to customers with reduced mobility and specific changes to the availability of lifts and escalators will be advertised as quickly as possible through public address announcements, social media and the TfL website.
- 5.9 LU may support station operations through the deployment of Special Requirements Team (SRT) staff inside the station, and stewards to assist queuing outside. As part of their own plans, certain Train Operating Companies (TOCs) and other TfL services will also supplement normal staff with additional people.
- 5.10 Any additional staff deployed to assist on stations will only carry out duties for which they are licensed to carry out in line with Rule Book procedures.
- 5.11 TfL TSEOs (Transport Support and Enforcement Officers) have been deployed to key stations on the LU network from late August / early September to support station staff, dealing with anti-social behaviour and the enforcement of the wearing of face masks. They are predominantly operating on the unpaid side of the station ticket barriers. TSEOs (or any other member of TfL staff) will encourage rather than enforce the TfL conditions of carriage requiring customers to wear face coverings on the TfL transport network after the 19 July 2021. This will include offering face coverings to customers travelling without them.
- 5.12 Where stewards are provided, their duties are the stewarding of the space immediately outside the station entrance and reminding customers to maintain distance between themselves and other customers using the station and LU staff. Briefings are provided to the station Customer Service Manager/Customer Service Supervisor and the steward to ensure that their role is fully understood.

- 5.13 The briefing for stewards also includes information that will enable them to be vigilant for security related issues and how to take action should they become aware of anything to be deemed as suspicious.
- 5.14 Where a queue forms outside a station, London Underground has no responsibility for the management of the queue, save for the area immediately outside the station entrance, nor for the behaviour of any person within that queue.
- 5.15 These will remain in place in the immediate term following the move into Step 4. Before we make any significant changes to our COVID-19 controls, we will carry out appropriate H&S risk assessments and will consider other implementation risks.

6. Wider Network Impacts / Other Transport Providers

- 6.1 All lines are aligned to LU's overall plan and are taking a consistent approach to the planning for customer services. LU is working with the other transport modes in TfL to ensure that our services support the wider TfL transport services. LU is also working with other transport providers to ensure that our plans are coordinated and aligned with their plans.

7. Network Delivery

- 7.1 The pandemic operational plan includes the arrangements by which LUCC Operations, Assets, Power Control and TACC shall continue to operate.
- 7.2 The response to incidents across the network provided by the Emergency Response Unit (ERU) and Network Incident Response Teams (NIRT) will be maintained throughout the period of the pandemic flu, although the number of available teams may be reduced.

8. Asset Performance & Capital Delivery

- 8.1 All LU asset teams have plans in place to maintain the network in line with the service provided. These plans include the ability to maintain safety critical and mandatory activities.
- 8.2 There may be a requirement for some asset concessions or Temporary Approved Non-Compliance (TANCs) to be required as a direct result of the increased train service and potential for an ongoing reduction in staff availability during the period of the pandemic. The application and approval of these concessions will follow the normal processes.
- 8.3 During the January 2021 lockdown, consideration was given to a 'safe stop' of projects (as we did in the first lockdown in March 2020). Further to this it was been decided that TfL projects would continue as there are appropriate mitigation measures in place to manage associated risks. We have a significant range of controls in place now which we did not have in place for the first lockdown in March 2020. Additionally, stopping a number of TfL projects would have future implications for the safe operation of the railway in terms of the essential maintenance renewals planned for the remainder of this financial year and potentially into future year. There will be no impact on the continuation of projects as a result of the Government announcement relating to stage 4 and the further lifting of restrictions. Site visits to project sites will continue to be of an essential nature only. Before we make any significant changes to our COVID-19 controls, we will carry out appropriate H&S risk assessments and will consider other implementation risks.

9. Competence

- 9.1 There is no deviation from defined competence arrangements for the roles being undertaken during the effects of a pandemic.

10. Working Hours

- 10.1 A maximum 12-hour shift will be worked by any individual, (planned shifts are 8 hours or less) and a minimum of 11 hours rest between shifts will be taken in line with LU standard S1548 *Safety Critical Work*. Other parameters such as the number and duration of rest breaks and rest days will be in accordance with existing procedures. Booking in and out of staff will follow existing procedures. Meal reliefs will be covered between those on duty as is normal practice.

11. Command and Control and Contingency Arrangements

- 11.1 Arrangements are in place for effective command, control and coordination provisions to be enacted to support the management and control of the risks highlighted in this CAP.
- 11.2 Incidents that occur on the network shall continue to be dealt with in accordance with the provisions of LU Rule Book 2.
- 11.3 An enhanced incident management process has been introduced to respond to incidents across the network. This is based on the existing incident management structure and Rule Book principles. This will ensure that that incident management is applied in a more expansive and expeditious manner, recognising the reduced threshold for trains and stations to become overcrowded and the impact this has on social distancing. Guidance on this has been provided to Senior Operating Officers and Service Managers.
- 11.4 The implementation of the LU pandemic flu plan will be driven by the LU Recovery Steering Group, supported by the LU Recovery Working Group.

12. Potential Refusal to Work on the Grounds of Health & Safety

- 12.1 LU continue to recognise our colleagues right to refuse to work should there be serious and imminent danger to their health or safety. This CAP sets out how we are managing the risks associated with Covid-19 which is fully in line with the advice from the Government and Public Health England (PHE) and with LU's operational response and plans. Based on this approach, we believe that it is safe for our colleagues to continue to work as long as we follow the new arrangements, or any new medical advice from the Government and PHE.
- 12.2 In the event of refusals to work on the grounds of safety, the steps detailed in LU Standard 5-547 *Refusal to Work on the Grounds of Health & Safety* shall be followed. A SHE Business Partner shall be available to assist and advise as detailed within the standard.

13. Communications / Consultation

- 13.1 Plans have been made for effective and timely customer and staff communication that will contribute to the control of risks highlighted herein. Emphasis will be placed on effective real time communication of all available information to both customers and staff to aid travel, the making of choices, manage customer expectations around services available, journey times and disruption and also, to influence customer decisions to reduce the risks of overcrowding and congestion at locations where services are affected.
- 13.2 A significant programme of customer communications continues to be delivered. These will remain in place following the move into Step 4 of the Government roadmap out of lockdown and will be supported by updated communications relating the wearing of face coverings on the network. This will be kept under review and will be developed as required.
- 13.3 This CAP will be shared with the Office of Rail and Road (ORR).

13.4 The CAP has been shared with the Trade Unions for their comments. All comments have been reviewed and the CAP has been updated where appropriate. Responses on all comments on the CAP have been sent to the Trades Unions.

14. Conclusion

- 14.1 The measures outlined in this CAP demonstrate how London Underground will continue to operate its network safely and sustainably through the COVID-19 pandemic. Our approach to managing this risk was considered in July 2021, particularly in the context of the move to Step 4 of the Government roadmap to the lifting of COVID-19 restrictions. Since the start of the pandemic, we have introduced a wide range of controls across the network – enhanced cleaning, hand sanitiser, face coverings, alternative ways of working, etc. The controls we have in place are all fully aligned with the extensive Government guidance on managing risks associated with the COVID-19 pandemic. Foreseeable hazards are considered in the risk table in Appendix 1 with the necessary mitigation measures that LU has and will continue to deploy to ensure that they are properly contained.
- 14.2 The level of service that is planned to run will be in accordance with existing LU standards, plans and procedures. Customer services will only be operated where this can be done safely in accordance with the arrangements outlined in this plan.
- 14.3 It is considered that the level of risk to customers, LU staff and contractors will not be significantly changed as a result of the arrangements outlined in this plan.
- 14.4 This Change Assurance Plan was reviewed by the Chief Safety, Health & Environment Officer and approved by Chair's Action on 17 June 2020.
- 14.5 This Change Assurance Plan has been reviewed periodically and after any changes to Government guidelines. For minor changes, the CAP is updated, published on the intranet and shared with the ORR. For significant changes, the CAP will be resubmitted to by the Chief Safety, Health & Environment Officer for review and approval.

ENDS

Appendix 1 - Risk Table

Hazard	Control	Risk	Accountable Person
<p>Health hazard biological – contact with COVID-19 leading to staff illness. This includes the risk associated with the new, more transmissible strain of the virus.</p>	<ul style="list-style-type: none"> • LU is following Government and Public Health England advice which is reviewed regularly by TfL’s Health & Wellbeing team. Guidance to managers and staff is implemented and updated as required • The health and safety risks associated with projects continuing during the January 2021 lockdown have been assessed and these projects can continue to operate safely as long as they continue to work in line with the TfL and Government guidance – visits to project sites will be essential visits only • Enhanced cleaning in place across the network • Availability of handwashing facilities and hand sanitisers for all staff • Guidance regularly issued to managers and staff including on dealing with ill customers, colleagues displaying symptoms and social distancing • Area Manger plans in place to manage social distancing at stations • Running as much of a train service as possible enables social distancing to be maintained as far as possible • Changes to some working practices introduced to ensure social distancing can be maintained where possible • Clear communication to our teams on how to remain safe and healthy in the LU Guidance on COVID-19 measures • Maintaining a requirement for our colleagues to wear face coverings at work (unless exempt, or behind a physical barrier)(in order to encourage customers to wear face coverings and to manage the risk of transmission of COVID-19) • Face visors available to staff to wear should they wish • Customers required to wear face coverings when travelling on LU services • First Responder packs issued which contain PPE (gloves, apron, Type IIR face mask and visor) for use when performing life-saving interventions • Hazard reporting • Customer communications on maintaining social distancing where possible and wearing face coverings - this messaging will be updated to reflect the arrangements in place across LU as the UK moves into stage 4 • Regularly refreshed Travel Demand Management plan in place • TfL Go App in place so customers can better plan their journeys to enable social distancing • Management support • Organisational support e.g. Human Resources and Health & Wellbeing COVID-19 phonelines and email 	<p>Medium</p>	<p>Head of Health and Wellbeing</p> <p>Heads of Customer Service / Line Operations</p> <p>Head of Stations & Structural Maintenance</p> <p>Internal / External Employee Communications</p>
<p>Health hazard biological – vulnerable staff (as defined by</p>	<ul style="list-style-type: none"> • LU is following Government, NHS and Public Health England advice which is 		

Hazard	Control	Risk	Accountable Person
<p>NHS guidelines) / those with pre-existing medical conditions contact with COVID-19 leading to illness. This includes the risk associated with the new, more transmissible strain of the virus.</p>	<p>reviewed regularly by TfL's Health & Wellbeing team. Guidance to managers and staff is implemented and updated as required. TfL's Health & Wellbeing team are providing extra support to those in our teams who are more vulnerable and to their managers</p> <ul style="list-style-type: none"> • Risk Assessment process implemented for BAME and vulnerable colleagues • Alternative ways of working introduced as necessary on an individual basis • The health and safety risks associated with projects continuing during the January 2021 lockdown have been assessed and these projects can continue to operate safely as long as they continue to work in line with the TfL and Government guidance– visits to project sites will be essential visits only • Enhanced cleaning in place across the network • Availability of handwashing facilities and hand sanitisers for all staff • Guidance regularly issued to managers and staff including on dealing with ill customers, colleagues displaying symptoms and social distancing • Area Manger plans in place to manage social distancing at stations • Running as much of a train service as possible enables social distancing to be maintained as far as possible • Changes to some working practices introduced to ensure social distancing can be maintained where possible • Clear communication to our teams on how to remain safe and healthy in the LU Guidance on COVID-19 measures • Maintaining a requirement for our colleagues to wear face coverings at work (unless exempt, or behind a physical barrier)(in order to encourage customers to wear face coverings and to manage the risk of transmission of COVID-19) • Type IIR face masks required to be worn by all staff considered to be vulnerable following risk assessment • Customers required to wear face coverings when travelling on LU services • First Responder packs issued which contain PPE (gloves, apron, Type IIR face mask and visor) for use when performing life-saving interventions • Hazard reporting • Customer communications on maintaining social distancing where possible and wearing face coverings - this messaging will be updated to reflect the arrangements in place across LU as the UK moves into stage 4 • Regularly refreshed Travel Demand Management plan in place • TfL Go App in place so customers can better plan their journeys to enable social distancing • Management support • Organisational support e.g. Human Resources and Health & Wellbeing COVID-19 phonedlines and email 	<p>Medium</p>	<p>Head of Health and Wellbeing</p> <p>Heads of Customer Service / Line Operations</p> <p>Head of Stations & Structural Maintenance</p> <p>Internal / External Employee Communications</p>

Hazard	Control	Risk	Accountable Person
<p>Removal of customer messaging to discourage them from using the transport network and removal of '2 metres' from social distancing messaging leading to a continued increased customer demand and not maintaining appropriate social distancing leading increased risk of staff exposure to COVID-19</p>	<ul style="list-style-type: none"> • LU is following Government and Public Health England advice which is reviewed regularly by TfL's Health & Wellbeing team. Guidance to managers and staff is implemented and updated as required • The health and safety risks associated with projects continuing during the January 2021 lockdown have been assessed and these projects can continue to operate safely as long as they continue to work in line with the TfL and Government guidance– visits to project sites will be essential visits only • Enhanced cleaning in place across the network • Availability of handwashing facilities and hand sanitisers for all staff • Guidance regularly issued to managers and staff including on dealing with ill customers, colleagues displaying symptoms and social distancing • Area Manger plans in place to manage social distancing at stations • Running as much of a train service as possible enables social distancing to be maintained as far as possible • Changes to some working practices introduced to ensure social distancing can be maintained where possible • Clear communication to our teams on how to remain safe and healthy in the LU Guidance on COVID-19 measures • Maintaining a requirement for our colleagues to wear face coverings at work (unless exempt, or behind a physical barrier)(in order to encourage customers to wear face coverings and to manage the risk of transmission of COVID-19) • Customers required to wear face coverings when travelling on LU services • First Responder packs issued which contain PPE (gloves, apron, Type IIR face mask and visor) for use when performing life-saving interventions • Hazard reporting • Customer communications on maintaining social distancing where possible and wearing face coverings - this messaging will be updated to reflect the arrangements in place across LU as the UK moves into stage 4 • Regularly refreshed Travel Demand Management plan in place • TfL Go App in place so customers can better plan their journeys to enable social distancing • Management support • Organisational support e.g. Human Resources and Health & Wellbeing COVID-19 phonelines and email 	<p>Medium</p>	<p>Head of Health and Wellbeing</p> <p>Heads of Customer Service / Line Operations</p> <p>Head of Stations & Structural Maintenance</p> <p>Internal / External Employee Communications</p>
<p>Psychological stress associated with concerns of COVID-19.</p>	<ul style="list-style-type: none"> • LU is following Government and Public Health England advice which is reviewed regularly by TfL's Health & Wellbeing team. Guidance to managers and staff implemented and updated as required. • The health and safety risks associated with projects continuing during the January 2021 lockdown have been assessed and these projects can continue 	<p>Medium</p>	<p>Head of Health and Wellbeing</p> <p>Heads of Customer Service / Line Operations</p>

Hazard	Control	Risk	Accountable Person
	<p>to operate safely as long as they continue to work in line with the TfL and Government guidance– visits to project sites will be essential visits only</p> <ul style="list-style-type: none"> • Enhanced cleaning in place across the network • Availability of handwashing facilities and hand sanitisers • Guidance regularly issued to managers and staff including on dealing with PIOTs, colleagues displaying symptoms and social distancing • Area Manger plans in place to manage social distancing at stations • Running as much of a train service as possible enables social distancing to be maintained as far as possible • Changes to some working practices introduced to ensure social distancing can be maintained where possible • Clear communication to our teams on how to remain safe and healthy in the LU Guidance on COVID-19 measures • Maintaining a requirement for our colleagues to wear face coverings at work (unless exempt, or behind a physical barrier)(in order to encourage customers to wear face coverings and to manage the risk of transmission of COVID-19) • Customers required to wear face coverings when travelling on LU services • Type IIR face masks required to be worn by all staff considered to be vulnerable following risk assessment • Face visors available to staff to wear should they wish • First Responder packs issued which contain PPE (gloves, apron, Type IIR face mask and visor) for use when performing life-saving interventions • Hazard reporting • Customer communications on maintaining social distancing where possible and wearing face coverings - this messaging will be updated to reflect the arrangements in place across LU as the UK moves into stage 4 • Regularly refreshed Travel Demand Management plan in place • TfL Go App in place so customers can better plan their journeys to enable social distancing • Management support • Organisational support e.g. Human Resources and Health & Wellbeing COVID-19 phonelines and email 		<p>Head of Stations & Structural Maintenance</p> <p>Internal / External Employee Communications</p>
<p>Staff not wearing face coverings when in public areas leading to customers believing they do not have to wear them leading to an increased risk of exposure to COVID-19 to our staff and to our customers</p>	<ul style="list-style-type: none"> • LU requires that customers and staff in public facing areas wear face coverings on LU • Customer communications reinforce the requirement for customers to wear face coverings • Staff communications explaining the importance of wearing face coverings when in public facing areas which are not behind a physical barrier 	<p>Low</p>	<p>Heads of Customer Service / Line Operations</p> <p>Head of Stations & Structural Maintenance</p> <p>Internal / External Employee</p>

Hazard	Control	Risk	Accountable Person
	<ul style="list-style-type: none"> TfL Conditions of Carriage have been updated to reflect the requirement for customers to wear a face covering Clear plans in place in relation to the requirement for customers to wear face coverings when travelling on the Underground network. Clear comms to station and revenue staff to ensure that they understand that they will only encourage and not be expected to enforce this requirement. 		Communications
Customers not wearing face coverings once national legislation requiring this expires on 19 July or because of changing weather temperature (e.g. heating on trains) leading to an increased risk of exposure to COVID-19 to our staff and customers.	<ul style="list-style-type: none"> Customer communications reinforce the requirement for customers to wear face coverings TfL Conditions of Carriage have been updated to reflect the requirement for customers to wear a face covering Clear plans in place in relation to the requirement for customers to wear face coverings when travelling on the Underground network. Clear comms to station and revenue staff to ensure that they understand that they will only encourage and not be expected to enforce this requirement. 	Low	Heads of Customer Service / Line Operations Customer Experience / Customer Communications
Service Control confusion regarding the service to be operated due to reduced numbers of available staff leading to inappropriate services being operated.	<ul style="list-style-type: none"> Staff will be briefed on any plans in place to ramp down services where this is necessary – these are based on tried and tested plans Any changes to the train services will be made by the Service Manager in conjunction with the SOO Management Support 	Low	Service Control Manager
PTI duties not covered at hotspot locations leading to an increase in incident and customer injuries as a result.	<ul style="list-style-type: none"> PTI duties during ‘normal’ operations are based on customer numbers and many of these hotspot locations do not have PTI duties in place at weekends. PTI duties remain in place at stations (e.g. Baker Street) which have these in position permanently during customer services. This will remain under review against customer demand to ensure that they are reinstated when appropriate 	Low	Heads of Customer Service / Line Operations
Risk that a customer falls between a train and a platform leading to injury.	<ul style="list-style-type: none"> Continued application of PTI duties by train operators, including working to controls relating to PTI risk set out in the Rule Book. Review potential implications from COVID-19 (e.g. lower customer numbers, any changes in train service, etc.) every four weeks to identify if any changes to PTI risk during the pandemic. 	Low	Heads of Line Operations Head of SHE LU & PS
Train operator opens train doors in error at a closed station leading to customers alighting and unable to exist a station leading to stress and potential for injury.	<ul style="list-style-type: none"> Train operators are briefed / updated when stations are closed Correct Side Door Enable (CSDE) will be cut out on platforms of closed stations where this is available which reduces the potential for this happening Station closed boards and lights are displayed Notices on train operator noticeboards at stations before closed stations Regular LIS announcements include stations that are closed If a train operator becomes aware that they have allowed customers to alight at 	Low	Heads of Customer Service / Line Operations

Hazard	Control	Risk	Accountable Person
	<p>a closed station they will inform service control to ensure and appropriate response is provided</p> <ul style="list-style-type: none"> In the event that this is not realised by the train operator customers are likely to attempt to exit the station. The majority of stations have emergency release handles so customers will be able to leave closed stations should this be necessary. Where emergency release handles are not available, gates will be closed but not secured so that they can be opened from the inside in the event of an emergency 		
<p>The introduction of barriers and one-way systems to assist social distancing on station introduces risk in terms of ability to effectively evacuate, creating bottlenecks leading to a risk of injury to staff and customers.</p>	<ul style="list-style-type: none"> Area Managers have determined location-based plans, measures that need to be implemented to both maintain social distancing and ensure stations can continue to be managed effectively. Staff briefed on social distancing changes Customer demand remains lower than pre-COVID and this will continue to be reviewed against current plans Guidance will be provided to stations on recognising triggers for when stations need to close so that social distancing can be maintained No change to current rules for managing stations and crowding Customer communications and signage will support any changes made to the way that stations operate 	<p>Low</p>	<p>Heads of Customer Services</p>
<p>Customers queuing outside of stations leading to congestion and crowding on streets and roads leading to increased potential for exposure to COVID-19.</p>	<ul style="list-style-type: none"> Area Managers have developed location-based plans, measures that need to be implemented to both maintain social distancing and ensure stations can continue to be managed effectively Stewards will be used to manage crowding outside stations Barriers will be used outside stations if needed Customer communications and signage will support any changes made to the way that stations operate 	<p>Low</p>	<p>Heads of Customer Services</p>
<p>Delay in incident response should they occur on unstaffed surface stations.</p>	<ul style="list-style-type: none"> No changes to current rules with respect to unstaffed stations Unstaffed stations will be monitored by the LUCC where CCTV is available. If not available, the nearest available member of staff will be dispatched to monitor the situation. The situation on the Network will remain under review by the SOO and a blue light response by the NIRM will be requested from BTP should this be appropriate. 	<p>Low</p>	<p>N/A in line with normal operations</p>
<p>Increased congestion at key interchanges across the network as customers make use of trains on lines which are able to</p>	<ul style="list-style-type: none"> All LU lines have been involved in the general pandemic resilience planning process. Additional staff to be deployed where possible to support station congestion control measures 	<p>Medium</p>	<p>Resilience Team</p>

Hazard	Control	Risk	Accountable Person
maintain normal working arrangements or change to and between alternative routes.	<ul style="list-style-type: none"> Travel Demand Management advice will be issued to customers to manage their journeys 		
Risk to customers and other persons outside LU stations both in the street and within Network Rail/TOC stations as queues develop through the implementation of station control arrangements.	<ul style="list-style-type: none"> All parties have been involved in the general pandemic resilience planning process. Identification of areas of risk will be shared to allow for appropriate mitigation arrangements or the deployment of extra staff to be put into place by partners where possible. Regularly refreshed Travel Demand Management plan in place LUCC will maintain operational contact with the Surface NMCC, Network Rail NOC and BTP FCRL throughout the period of the pandemic 	Medium	Resilience Team
Increase in staff verbal / physical abuse as a result of stations being closed, increased likelihood of station control being implemented to maintain social distancing, implementation of one-way systems, conflict between Government guidance on face coverings being recommended (rather than legal) versus LUs requirement for face coverings to be worn etc. This may include use of COVID-19 as a threat to staff.	<ul style="list-style-type: none"> Management Support BTP Support Staff will follow normal procedures of removing themselves from potential conflict Provision of Body Worn Cameras to all staff Guidance to be provided to voluntary staff Customer communications to manage expectations – this will be updated to reflect move into Step 4 Stations closed if public transport services stop Trauma Support Group assistance Clear plans in place in relation to the requirement for customers to wear face coverings when travelling on the Underground network. Clear comms to station and revenue staff to ensure that they understand that they will only encourage and not be expected to enforce this requirement. 	Medium	Area Managers / Volunteer Team
Vulnerable persons coming to harm having accessed the network through unstaffed open section stations.	<ul style="list-style-type: none"> Unstaffed stations will be monitored by the LUCC where CCTV is available. Where no CCTV is available, a member of staff will be dispatched to check the station as they are available BTP patrols requested to actively patrol unstaffed stations. 	Low	Service Manager /SOO
Criminal damage and other activity taking place on unstaffed stations and train stabling points.	<ul style="list-style-type: none"> Security staff at train stabling points to be maintained as much as possible. Unstaffed stations will be monitored by the LUCC where CCTV is available. Where no CCTV is available, a member of staff will be dispatched to check the station as they are available BTP patrols requested to actively patrol vulnerable locations. 	Medium	Service Manager /SOO /Asset managers
Stations close if there are insufficient staff available to complete checks required to	<ul style="list-style-type: none"> No change to BAU process – legal requirement 	N/A	Heads of Customer Service

Hazard	Control	Risk	Accountable Person
meet the DfT mandated security regime.			
Track patrols not undertaken in line with LU Standards.	<ul style="list-style-type: none"> • Non-compliances will be addressed prior to the train service operating or mitigation measures will be implemented. • Concessions applied as appropriate 	Medium	Relevant AP&CD Heads of
Delays to track fault response leading to suspended train services and congestion on stations and trains.	<ul style="list-style-type: none"> • Work will be prioritised in line with current arrangements. • Implementation of mitigation measures e.g. speed restrictions, rails secured. • Availability of staff will be considered prior to decisions made to run increase train services. • Incidents will be managed in line with Rule Books and CCEPs. 	Low	Relevant AP&CD Heads of
Delays to signal failure response leading to suspended train services and congestion on stations and trains.	<ul style="list-style-type: none"> • Availability of staff will be considered prior to decisions made to run increase train services. • Incidents will be managed in line with Rule Books and CCEPs. 	Low	Relevant AP&CD Heads of
Delays to escalator / lift fault response leading to customers trapped in lifts or an escalator stopping in service.	<ul style="list-style-type: none"> • Lifts / escalators taken out of service. • Lifts / escalators taken out of service on open stations where no licensed staff available. • Managed in line with station management plans. • Stations closed as necessary. 	Low	Relevant AP&CD Heads of
Insufficient train preparation undertaken in time for start of traffic leading to cancelled trains and delays to the train service.	<ul style="list-style-type: none"> • Concession will be used. • Use of Concession monitored and reviewed by LU Head of Rolling Stock (no issues identified). • No trains will be offered for service that have not been prepared. 	Low	Relevant AP&CD Heads of