

TRANSPORT FOR LONDON

SAFETY, HEALTH AND ENVIRONMENT ASSURANCE COMMITTEE

SUBJECT: ANNUAL HSE ASSURANCE LETTERS 2009/10

DATE: 20 JULY 2010

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 2009/10 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 Committee.

3 INFORMATION

- 3.1 The modes are provided with a pro forma and guidance detailing the elements to be addressed in their HSE Assurance Letters.
- 3.2 The 2009/10 Health, Safety and Environment Assurance Letters from each of the Modes are attached as Appendices 1 - 5:

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

4 RECOMMENDATION

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

5 CONTACT

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Transport for London

LONDON UNDERGROUND LIMITED

**SUBJECT: Health Safety and Environment Assurance Letter for
London Underground**

DATE: 30 April 2010

1 Introduction

This Letter documents the status of the Health, Safety and Environmental Management System for London Underground (LU) at the end of 31 March 2010.

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.

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.

2.2 HSE Management Systems

The LU Health, Safety and Environment Management System (HSEMS) has been refined over twenty years and drives the ever improving HSE performance of the business. The core standards of the HSEMS are mandated on LU's supply chain who make a significant contribution to LU's overall performance. These standards 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.

During 2009/10, London Underground undertook a three yearly review of the management system and integrated key standards into the newly developed company management system guidance documentation for operational managers. Integration of the HSEMS into LU's new and comprehensive management system makes it easier for managers to comply with the requirements of the system and facilitates efficient compliance verification.

2.3 Management Competence

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

LU has established and implemented a range of internal health and safety training courses for junior, middle and senior management/directors. The emphasis in respect of these courses is on those managers whose roles have the greatest impact on risk in the LU operational environment. A training needs analysis for environmental competence was carried out in 2009/10. Areas for improvements were identified during the project and work is underway to improve environmental competence where required across the business.

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 2009/10 programme, which builds on from previous programmes, was endorsed by the LU Health, Safety and Environment Committee in May 2009. 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.

2.5 Risk Assessments

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

LU standards require that our risk assessments are subject to thorough review periodically, at times of change and following significant events, as appropriate. Our on-going programme of review has been adhered to, with work commencing in 2009/10 to integrate the former Metronet and LU procedures. In this way we ensure that our health and safety risks are maintained at levels that are as low as reasonably practicable.

2.6 Meetings and Consultations

The LU Health, Safety and Environment Committee met on a quarterly basis in 2009/10. The Committee is chaired by the Director of Safety with members drawn from LU Directors and senior management representatives. Tube Lines have standing invitations for their Managing Director and Safety Director as non-members, and the latter attends 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 2009/10, and special meetings were held when necessary. The remit of the Group encompasses the peer review/validation of change where this has 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 actions 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.

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 on to 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 LU HSEC.

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 2009/10 was approved by the LU HSEC and covered key LU health, safety and environment processes, operational and maintenance risk controls and specific topic areas. The audit programme also covers LU's 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.

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.

During 2009/10, a tool was developed to ensure appropriate environmental criteria were identified and subsequently introduced at each stage of the procurement process for capital works. The effectiveness of the application of this tool will be verified in 2010/11.

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 review 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.

3.0 Future HSEMS Developments

As part of the ongoing review and development of the LU HSEMS, a number of significant improvement actions are scheduled for this year. LU has a commitment to continuous improvement in health, safety and environmental management and performance. This means that LU regularly considers how performance can be improved. This is achieved through the respective health, safety and environmental improvement programmes each year. These programmes are 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 part of the LU Plan, which is available on the LU intranet.

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

- Integrating the HSEMS into the new company management system guidance documentation for all maintenance managers and project managers
- Ongoing integration of the LU and former Metronet HSE standards and procedures
- Ongoing review and updating of our top event major accident hazard risk models
- Continued implementation of the safety critical communications programme
- Continued delivery of health fairs to maintenance and operational staff
- Environmental improvement actions including:
 - improving environmental management competence across the business,
 - developing and implementation of new tools for improving project and maintenance noise management,
 - reviewing and updating the LU Biodiversity Action Plan,
 - improving recycling at our stations, depots and project sites,
 - delivery of a Low Carbon Stations project and completion of the LU traction energy efficiency savings programme

This programme of improvements is an integral part of The Plan for 2010/11 and will be overseen by the LU Executive Committee and reviewed in detail by the LU HSEC.

Mike Brown
Managing Director, London Underground

Transport for London

SURFACE TRANSPORT

Subject: Health Safety and Environment Assurance Letter for Surface Transport

Date: 1 May 2010

1 Introduction

This Letter documents the status of the Health, Safety and Environmental Management Systems (HSEMS) for Surface Transport at 31 March 2010.

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

2.1 Health Safety and Environment (HSE) Policy

The TfL Group HSE Policy statement, amended August 2006 (reviewed March 2008), has been adopted by Surface Transport. In order to promote greater local ownership, the policy has been branded to individual directorates and modes and authorised at that level. The policy statement has been made available to all staff via the TfL intranet, notice boards and in health and safety and environmental training. This statement is currently under review TfL wide.

2.2 HSE Management Systems

Stages of implementation of HSEMSs vary across Surface Transport with some parts of the organisation (Streets) considered to be "*Implemented in full*". Implementation in other parts range between "*Under development*"¹ (Better Routes and Places) and "*Implemented*". This position follows extensive work to integrate environmental procedures into management systems for respective modes/directorates and in response to a series of organisational changes in recent years. Priority will be given to efforts towards attaining "*implemented in full*" status across Surface Transport during 2010 - 11.

The systems in Streets will be independently audited by RoSPA in 2010 as part of a bi-annual auditing arrangement. Internal audit programmes for areas regarded as "*Implemented*" are being developed.

¹ 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

Surface Transport strives to meet legal compliance through all of its operations, including waste management and drainage. The current focus is to ensure that relevant waste documentation (including site waste management plans) is in place and that drainage plans for TfL-owned and managed premises are current. Health, safety and environmental governance arrangements approve actions to achieve and to monitor legal compliance.

2.3 Management Competence

London Buses and London Streets Organisation and Arrangements (O&A) documents describe the health, safety and environmental 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. The O&A document for Surface Transport is currently under review to take account of organisational changes.

Safety Managers are supported by a recently appointed Safety Co-ordination Manager to coordinate the HSEMS assurance processes and H&S competency across ST. To meet policy commitments, a range of health, safety and environmental training comprising of induction and general/role activities are delivered across the organisation. Under a new arrangement, Surface Transport expects to see better co-ordination in efforts aimed at improving competence throughout the organisation.

Environmental awareness training is provided to relevant teams on a needs basis and to support the roll-out programme for recently updated HSEMSs.

2.4 HSE Objectives / Key Performance Indicators (KPIs)

Health and safety objectives are set annually and reviewed quarterly at two levels; as part of the Operations Directorates' service delivery planning process and at modal/directorate level.

All directorates have health and safety objectives, with a greater emphasis placed on modes managing significant risks. Steps are in place to ensure these objectives align to the Operational H&S objectives and that they are signed off and monitored at local safety governance meetings/committees. From 2010/11, environmental objectives will be included.

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

Surface HSE performance is reported to the Surface Strategy Board and SHEAC. Environmental data is submitted against TfL's

Environmental KPIs and reported through the annual TfL Environment Report.

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

Surface Transport recognises that more work is needed to further improve the way in which objectives are established and reviewed across the organisation. The work started in March 2010 to address this will further enhance the standardisation of processes and objective alignment.

Analysis of road casualty data is 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 are monitored locally and published on the TfL website.

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 have recently been revised as part of the implementation of modal/directorate HSEMS and risk assessment training continues to allow greater local risk management.

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

2.6 Meetings and Consultation

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

Health Safety and Environmental Governance Meetings for each directorate/mode, provide the opportunity to ensure that HSE assurance and performance are systematically monitored. Separate environmental governance meetings are held for London Buses to reflect the level of environmental assurance required.

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

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

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 implemented an enhanced incident reporting system offering a web-based solution for bus operators, Dial-a-Ride and London Bus Services. The system offers opportunities for application in other areas of the organisation. Incident reporting by bus operating companies forms part of the annual Contract Compliance Audit.

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

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 is monitored at modal/directorate health and safety committee/governance meetings and at a four weekly Surface Board Meetings and quarterly SHEAC meetings.

2.8 Assuring HSE Performance

Assurance of HSE continues to be undertaken across the modes/directorates, through a combination of independent audits, physical condition surveys, planned general inspections and operational inspections. A recent exercise reviewing existing H&S assurance activities provides further opportunities for evaluating the activities.

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

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 into the project team.

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

2.10 Actions from review of Management System

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 been developed and implemented in co-ordination with the H&S process.

Following recent revisions to HSEMSs, work is now underway to develop and implement audit programmes for operational areas for the coming years. A key priority for Surface Transport in 2010/11 will be on ensuring the robustness of arrangements in place for reviewing the management system.

3.0 Future HSEMS Developments

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

MD's SIGNATURE:

DATE:

Transport for London

LONDON RAIL

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

Date: 18 May 2010

1 Introduction

This Letter documents the status of the Health, Safety and Environmental Management System for London Rail at 31 March 2010.

London Rail is made up of three separate modes Docklands Light Railway (DLR), London Overground and London Tramlink. The transport services themselves are delivered by Private Sector contractors.

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

2.1 Health Safety and Environment (HSE) Policy

| | | | | | |
|-------------------------|--------------------------|-------------------|--------------------------|-----------------|--------------------------|
| Docklands Light Railway | fully implemented | London Overground | fully implemented | London Tramlink | fully implemented |
|-------------------------|--------------------------|-------------------|--------------------------|-----------------|--------------------------|

London Rail has adopted the TfL Health, Safety and Environmental Policy. The policy is widely available on the TfL Intranet. It is also on display on Health and Safety notice boards throughout our offices.

2.2 HSE Management Systems

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|-------------------------|--------------------------|-------------------|--------------------|-----------------|-----------------|
| Docklands Light Railway | Fully implemented | London Overground | Implemented | London Tramlink | In place |
|-------------------------|--------------------------|-------------------|--------------------|-----------------|-----------------|

In each mode there is a management system covering the TfL operations, backed up in the case of DLR and the East London Line section of Overground network, by Safety Authorisation documentation assessed by the Office of Rail Regulation (ORR). There are complementary safety management systems set out in formal Safety Certification for each of the contractor operators. This documentation is also assessed the 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 London Overground system has been developed to incorporate Infrastructure Manager responsibilities, and will be further refined during the first 6 month of operation of the East London Line core route. The system in Trams is still being revised, with the aim of implementing a fully integrated system later in 2010.

2.3 Management Competence

| | | | | | |
|-------------------------|--------------------|-------------------|--------------------|-----------------|-----------------|
| Docklands Light Railway | Implemented | London Overground | Implemented | London Tramlink | In place |
|-------------------------|--------------------|-------------------|--------------------|-----------------|-----------------|

Job Descriptions summarise the key HSE competencies for specific employees.

DLR, London Overground Operations and London Tramlink have systems developed to identify and manage the competency of safety critical employees.

Further work is planned to build more robust competence management systems this year.

2.4 HSE Objectives / Key Performance Indicators (KPIs)

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|-------------------------|--------------------------|-------------------|--------------------|-----------------|-----------------|
| Docklands Light Railway | Fully implemented | London Overground | Implemented | London Tramlink | In place |
|-------------------------|--------------------------|-------------------|--------------------|-----------------|-----------------|

HSE objectives have been developed on a London Rail wide basis and then integrated into the planning of each of the modes.

DLR have a full set of operational KPIs. The changes to London Overground (as the construction project has moved to become an operational mode with Infrastructure Manager responsibilities alongside the existing Operations mode) means that whilst specific KPIs have been developed and are regularly reviewed they will need more time to demonstrate trends. London Tramlink have developed KPIs – benchmarking and tolerance criteria are now been applied.

2.5 Risk Assessments (including impacts from climate change)

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|-------------------------|--------------------|-------------------|--------------------|-----------------|--------------------------|
| Docklands Light Railway | Implemented | London Overground | Implemented | London Tramlink | Under development |
|-------------------------|--------------------|-------------------|--------------------|-----------------|--------------------------|

Programmes of risk assessments are implemented in DLR and London Overground. There is a need to further develop the risk assessments in terms of both procedures and detail in London Tramlink.

Work streams to record and then integrate into existing risk assessments the impacts of climate change began in 2009 and will carry on throughout 2010.

2.6 Meetings and Consultations

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|-------------------------|--------------------------|-------------------|--------------------------|-----------------|-----------------|
| Docklands Light Railway | Fully implemented | London Overground | Fully implemented | London Tramlink | In place |
|-------------------------|--------------------------|-------------------|--------------------------|-----------------|-----------------|

Scheduled meetings are fully implemented in both DLR and London Overground. Arrangements are also in place in London Tramlink but these need further development.

2.7 Incident Reporting and Investigation

| | | | | | |
|-------------------------|--------------------------|-------------------|--------------------------|-----------------|-----------------|
| Docklands Light Railway | Fully implemented | London Overground | Fully implemented | London Tramlink | In place |
|-------------------------|--------------------------|-------------------|--------------------------|-----------------|-----------------|

Full procedures have been developed for carrying out investigations in both DLR and London Overground. The approach in London Tramlink is being further refined with both the system operator and maintenance companies.

2.8 Assuring HSE Performance

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|-------------------------|--------------------------|-------------------|--------------------------|-----------------|-----------------|
| Docklands Light Railway | Fully implemented | London Overground | Fully implemented | London Tramlink | In place |
|-------------------------|--------------------------|-------------------|--------------------------|-----------------|-----------------|

A programme of audits has been in operation on DLR and London Overground throughout the last year. The audits actions and recommendations are monitored and tracked through to conclusion. London Tramlink has developed a comprehensive audit plan for 2010/11.

2.9 Procurement Management

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|-------------------------|--------------------------|-------------------|--------------------------|-----------------|-----------------|
| Docklands Light Railway | Fully implemented | London Overground | Fully implemented | London Tramlink | In place |
|-------------------------|--------------------------|-------------------|--------------------------|-----------------|-----------------|

DLR and London Overground Operations and Infrastructure 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

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|-------------------------|--------------------------|-------------------|--------------------------|-----------------|--------------------------|
| Docklands Light Railway | Fully implemented | London Overground | Fully implemented | London Tramlink | Under development |
|-------------------------|--------------------------|-------------------|--------------------------|-----------------|--------------------------|

DLR and London Overground have fully developed arrangements in place with regards to reviewing the performance of the Management System. In London Tramlink the key elements of the Management System are in place these will be subject to review during the latter part of 2010.

3.0 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.

- On DLR the development and introduction of a revised Accident and Investigation procedure
- On DLR the development and introduction of a Business Critical Process for assuring the operability of new or altered assets
- On DLR the introduction of the new engineering Competency Management System.

- London Overground will be further developing their existing safety risk models.
- On London Tramlink the completion of the IMS including the joint investigation protocols and full workplace risk assessments to replace the previous systems
- Risk modelling of London Tramlink based on the previous operating risk model which will create for the first time a fully integrated risk model.
- Development of key guidance for risk management (UK tram based) including off street crossings and tram/pedestrian/cycle interfaces.

Ian Brown
Managing Director
London Rail

Transport for London

CROSSRAIL LIMITED

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

Date: June 2010

1.0 Introduction

This Letter documents the status of the Health, Safety and Environmental Management System (HSEMS) for CRL at 31 March 2010.

2.0 Status of Health Safety and Environment Management System(s)**2.1 Health Safety and Environment (HSE) Policy**

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

2.2 HSE Management Systems

The Health, Safety and Environmental Management Systems have been reviewed against and are compliant with the TfL policies and procedures. They have also been certificated against the standards BS OHSAS 18001 occupational health and safety management systems and ISO 14001 environmental management system by LRQA.

2.3 Management Competence

A competence matrix has been developed and agreed by the executive team. A training programme to deliver the requirements of the matrix is ongoing in accordance with business priorities.

2.4 HSE Objectives / Key Performance Indicators (KPIs)

CRL 20010/11 health, safety and security objectives were agreed in March 2010 and came into operation in April.

The CRL environmental objectives were agreed in June 2009, and will be updated in June 2010. The HSE objectives support the TfL objectives. The objectives are supported by a suite of KPI's, which have been further developed over the last year. These monitor the effectiveness of the HSEMS. KPI's and progress on objectives are monitored by the CRL Board, CRL Executive and in the health, safety and environment board sub-committee.

2.5 Risk Assessments

Risk assessments are in place to ensure all risks are reduced to ALARP (as low as reasonably practicable) through implementation of control measures and ongoing review. All CRL assessments have been reviewed and if necessary updated during the year.

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. The last consultation meeting with employee representatives was held on the 12 April, with the next meeting being planned for the 14 June.

2.7 Incident Reporting and Investigation

CRL have in place incident investigation and reporting procedures which are supported by procedures operated by the Project Delivery Partner. The details of all incidents along with the investigation findings and corrective actions are logged in the CRL Incident management system enabling trends to be identified and Programme wide improvement action to be taken where necessary.

2.8 Assuring HSE Performance

The annual audit programme has been agreed by the 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

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

2.10 Review of the HSE Management System

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

3.0 Future HSE MS Developments

During the coming year the management systems will be reviewed with the plan to simplify and clarify all processes.

Rob Holden
Chief Executive Officer
June 2010

Transport for London

TfL CORPORATE DIRECTORATES

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

Date: April 2010

1 Introduction

This Letter documents the status of the Health, Safety and Environmental Management System for the TfL Corporate Directorates at 31 March 2010. Corporate Directorates comprise Finance, General Counsel, Marketing and Communications and Planning.

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

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

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 its requirements to aid the development of a training and information programme for managers.

2.4 HSE Objectives / Key Performance Indicators (KPIs)

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

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 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 agreed with recognised trade unions. The consultation arrangements that address the requirements of the Safety Representative and Safety Committees Regulations 1977 and the Health and Safety (Consultation with Employees) Regulations 1996 are being rolled out across Corporate Directorates.

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

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 SHEAC.

2.9 Procurement Management

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

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

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

2.10 Review of the Management System

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

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

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

Following the review of the Group HSEMS, the Corporate Directorate HSEMS will need to be reviewed and updated to also take account of organisational and legislative changes.

3.0 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 2010/11:

- Using the TfL Group HSE Competency Framework as a basis, a gap analysis is being undertaken to develop a training programme that addresses identified HSE competency requirements
- Corporate Directorates HSEMS will be updated to reflect outputs from review work and to address continuing organisational change
- HSE-specific pre-qualification questions will be developed to support the TfL standard pre-qualification questionnaire (PQQ) to strengthen HSE requirements

4.0 Corporate Directorate ‘Specific’ HSE Responsibilities

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

4.1 Marketing & 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 via agent response and voice recognition systems) 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 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.*

HSE consultation arrangements that meet the requirements of the Corporate Directorates will be fine-tuned to address organisational change arising during 2010.

- (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 has environmental management processes and procedures in place that cover the requirements of widely used International Standards Organisation (ISO) 14001 Environmental Management Standard and is looking into the requirements for meeting the ISO 50001 Energy Management Standard. The Corporate Directorates HSEMS will be reviewed to ensure the correct links are in place with the GPF documentation.

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

TfL Procurement is aligned to a consistent set of Standing Orders, procurement policy and processes. 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 Management System Policy was reviewed and updated in 2008/10.

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

Crossrail now follows the same arrangements for the management and provision of HSE assurance as the other TfL modes.

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

The primary means of assurance to the Board is through the Safety Health and Environment Assurance Committee (SHEAC) that addresses TfL HSE performance on behalf of the Board. Group HSE delivers Quarterly and Annual aligned modal HSEMS reports to SHEAC detailing incident trends, audit activity, sickness absence and HSEMS status updates. An external audit of the Group HSE MS was completed in 2007/08. 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.

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

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

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

(d) Assess compliance with HSE legislation.

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

Declaration assuring compliance with legal risk management processes. The CSA documentation is completed once each year.

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

(e) Maintain HSE legal support.

TfL General Counsel provides HSE legal support and training as required.

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

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

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

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

Howard Carter
General Counsel

4.4 Group Planning 'Specific' HSE Responsibilities

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

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

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

Michele Dix
Managing Director, Planning