

# Health and Safety Policy

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## 1.0 BFK Joint Venture Health and Safety Policy Statement

It is the policy of BFK to ensure, so far as is reasonably practicable, the health, safety and welfare of its employees and the health and safety of other persons who may be affected by its activities.

The Board of Directors and Senior Managers have given their commitment to this Policy.

To achieve this objective BFK is committed to:

- Establishing, implementing and maintaining a procedure(s) for the ongoing hazard identification, risk assessment, and determination of necessary controls.
- Ensuring the requirements of the Health & Safety Policy are communicated to all employees and the involvement of all individuals in the management of health and safety is actively promoted through effective consultation and involvement.
- Providing the resources necessary to safeguard the health, safety and welfare of its own and sub-contractors employees whilst at work.
- Providing and maintaining safe plant, equipment and systems of work.
- Making arrangements for the safe use, handling, storage and transport of articles and substances.
- Providing information, instruction, training and supervision to all employees to ensure that they properly discharge their responsibilities and duties.
- Providing and maintaining safe places of work and means of entry to and exit from them.
- Providing and maintaining a healthy and safe working environment for all employees.
- Carrying out its activities in compliance with the requirements of current Occupational Health and Safety legislation.
- Promoting best practices which minimise the risk of injury and occupational ill health.
- Embracing behavioural based training and development programmes and exemplary standards of behaviour.
- Continually improve upon health and safety performance and systems.
- Regularly set objectives and review performance.
- Implementing and promoting the Beyond Target Zero behavioural safety programme

To meet these standards, BFK have a Safety Management System in place that complies with Occupational Health and Safety Assessment Series, BS OHSAS 18001:2007.

This Policy shall be communicated to all personnel working on behalf of the Joint Venture through their project inductions, and shall be prominently displayed at all project locations. The Policy shall also be made publicly available via the Joint Venture's website [www.teambfk.co.uk](http://www.teambfk.co.uk).

The BFK Board and Safety Manager shall review this policy on a regular basis and nominate a Board member as responsible for the policy's implementation, this will be the current chairman of the JV board.

It is the duty of every employee to be aware of and conform to the Health and Safety Policy and Codes of Practice and to accept and carry out defined responsibilities.

This policy will be issued to other interested parties upon request.

Signed for and on behalf of the Joint Venture Board

**Adrian Savory**

**Luis Amorim**

**Peter Bimson**

04 April 2012

## 1.1 Construction (Design and Management) Regulations

The BFK duties as principal contractor under Regulations **4 to 7**, **22**, and **24 to 44** are listed below:

***BFK, as Principal contractors shall:***

- (a) satisfy ourselves that the client is aware of their duties, that a CDM co-ordinator has been appointed and HSE notified before we start work;
- (b) make sure that we have competent persons in place to address the health and safety issues likely to be involved in the management of the construction phase;
- (c) ensure that the construction phase is properly planned, managed and monitored, with adequately resourced, competent site management appropriate to the risk and activity;
- (d) ensure that every contractor who will work on the project is informed of the minimum amount of time which they will be allowed for planning and preparation before they begin work on site;
- (e) ensure that all contractors are provided with the information about the project that they need to enable them to carry out their work safely and without risk to health. Requests from contractors for information shall be met promptly;
- (f) ensure safe working and co-ordination and co-operation between contractors;
- (g) ensure that a suitable construction phase plan ('the plan') is:
  - (i) prepared before construction work begins,
  - (ii) developed in discussion with, and communicated to, contractors affected by it,
  - (iii) implemented, and
  - (iv) kept up to date as the project progresses;
- (h) satisfy ourselves that the designers and contractors that we engage are competent and adequately resourced;
- (i) ensure suitable welfare facilities are provided from the start of the construction phase;
- (j) take reasonable steps to prevent unauthorised access to the site;
- (k) prepare and enforce any necessary site rules;
- (l) provide (copies of or access to) relevant parts of the plan and other information to contractors, including the self-employed, in time for them to plan their work;
- (m) liaise with the CDM co-ordinator on design carried out during the construction phase, including design by specialist contractors, and its implications for the plan;
- (n) provide the CDM co-ordinator promptly with any information relevant to the health and safety file;
- (o) ensure that all the workers have been provided with suitable health and safety induction, information and training;
- (p) ensure that the workforce is consulted about health and safety matters;
- (q) display the project notification.

To formalise the respective health, safety and environmental contribution of each Industry Partner and Stakeholder, a Crossrail Health Safety and Environment Agreement has been developed and agreed. The Agreement sets out a number of key health safety and environmental leadership behaviours and values that underpin our shared determination to deliver health safety and environmental excellence across the Programme. See: **1.2, below:**

## 1.2 Health Safety & Environment Agreement

This agreement signed by the principal parties involved in delivering Crossrail sets out a number of key HS&E leadership behaviours and values that underpin our shared determination to work together to deliver HS&E excellence within the Crossrail programme.

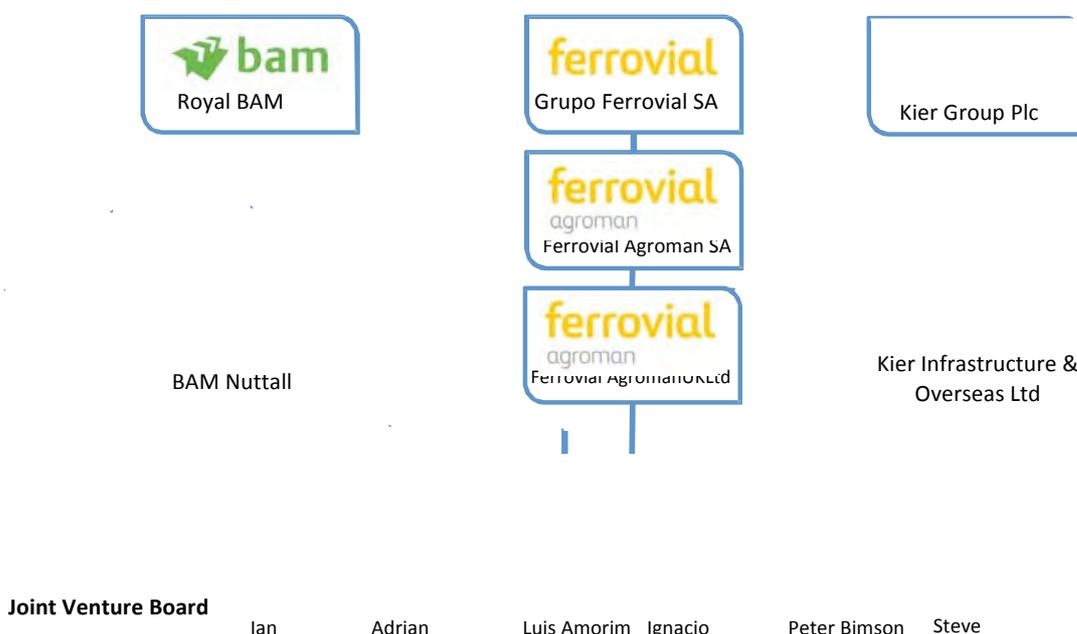
We will commit to:

1. **Policies:** Work to meet the spirit and intent of the Crossrail HS&E Policy Statement
2. **Commitments:** Demonstrate our personal commitment to HS&E excellence, so people on works under our control and influence go home safely
3. **Best Practice:** Innovate, share and adopt HS&E best practice so that together we may deliver a world class railway
4. **Health:** Promote occupational health and wellbeing as key areas
5. **Arrangements:** Work to the framework set out within the Crossrail publication “Health Safety Environment: Contractors and Industry Partners”.

We will regularly monitor progress against the above commitments and embed them within our organisational cultures. The extent of our success will be made publicly available.

## 2.0 Organisation

### 2.1 BFK Joint Venture Board of Directors



## 2.2 BFK Project Organisation Chart

For details of the current BFK organisation chart refer to the Construction Phase Health and Safety Plan. This shows lines of responsibility for the project team.

## 3.0 Safety Responsibilities

### 3.1 Directors / Members of the Senior Management Team

Directors are responsible to the Board of Directors for ensuring the implementation of this policy within the projects under their control.

In particular they will:

- ensure that adequate resources are made available for health and safety
- communicate directives from the board to senior managers and ensure compliance
- periodically attend health and safety advisors meetings
- conduct regular safety tours
- implement and promote the Beyond Target Zero behavioural safety programme
- initiate disciplinary action, where appropriate, for breaches in health and safety
- set a personal example of safe behaviour

### 3.2 Director with Health and Safety Responsibility

The director responsible for health and safety promotes and champions the cause of health and safety. The director responsible for health and safety will be the current chairman of the JV board.

In particular they will:

- initiate the annual review of the policy
- monitor the performance of the safety department
- periodically attend safety department meetings
- ensure that the health and safety system is established, implemented and maintained in accordance with BS / ISO Standards
- chair the annual health and safety management system review meetings
- set annual health and safety targets
- implement and promote the Beyond Target Zero behavioural safety programme
- authorise health and safety department expenditure
- arrange for the head of health and safety's monthly and annual reports to be circulated to all senior managers and heads of department
- conduct regular safety tours
- set a personal example of safe behaviour

### 3.3 Project Director

- ensure that adequate resources are made available for health and safety
- communicate directives from the board to senior managers and ensure compliance
- ensure the site is established to present a professional and safe image
- consider at the planning stage and subsequently as any works proceed any hazardous activities, and define by risk assessment appropriate safe systems of work
- ensure the appointment of competent and appropriately qualified senior managers
- ensure that personnel with the appropriate competency are involved in the risk assessment process
- inform the JV board of accidents/incidents/near misses which fall within RIVO categories 1, 2 or 3.
- satisfy themselves that adequate resources have been provided to enable the work to be undertaken safely
- ensure that all line managers, supervisors and appointees are trained, competent and aware of their responsibilities
- ensure that all personnel attend training courses
- co-operate with the Health and Safety Executive in connection with their site visits
- periodically attend health and safety advisors meetings
- conduct regular safety tours
- implement, monitor and report on the health and safety targets
- implement and promote the Beyond Target Zero behavioural safety programme
- initiate disciplinary action, where appropriate, for breaches in health and safety
- set a personal example of safe behaviour

### 3.4 Health and Safety Manager

The Health and Safety Manager is accountable to the director responsible for health and safety for the promotion and monitoring of this policy at all locations in which BFK

operations are conducted.

In particular they will:

- ensure the appointment of competent health and safety advisors
- ensure that health and safety advisors receive such further training as is necessary for them to fulfil their responsibilities
- periodically review and advise the board on the adequacy of the resources allocated to the safety department
- review annually the policy and safety management system with the director responsible for safety and arrange for revision when appropriate
- ensure that the policy is distributed in accordance with the general statement
- review and authorise for issue new and revised health and safety procedures
- liaise with heads of department and senior managers by attendance at management meetings
- manage and organise the health and safety department in such a manner as to provide BFK managers with comprehensive information and advice on current and forthcoming health and safety legislation
- implement and promote the Beyond Target Zero behavioural safety programme
- co-operate with the Health and Safety Executive in connection with their site visits
- initiate and maintain inspection and monitoring procedures for all BFK activities
- establish and maintain the occupational health and safety management system
- control and co-ordinate the activities of BFK health and safety advisors
- undertake the role of senior health and safety advisor when no such appointment is made
- undertake regular safety tours of BFK sites, offices and depots
- review all accident reports and ensure appropriate distribution
- devise and promote initiatives to deal with the causes of recurring accidents
- maintain statistical records of injuries, diseases, near misses and dangerous occurrences which have resulted from BFK activities and review them regularly for trends
- arrange for the publication and distribution of health and safety information
- submit monthly, to the board a summary of:
  - incident statistics
  - lessons learned
  - regulatory authority contacts
  - examples of best practice
- report annually, to the director responsible for health and safety, on BFK health and safety performance
- organise and chair regular health and safety advisors meetings
- liaise with the human resources team in the preparation of an annual health and safety training plan
- advise on the content of and monitor provision of all health and safety training
- provide resource and competent trainers to deliver health and safety training
- set annual performance targets for the health and safety department
- set a personal example of safe behaviour

### 3.5 Health and Safety Advisers

Health and safety advisers are accountable to their health and safety manager for the promotion of safe and healthy working practices and for monitoring the implementation of BFK policy and procedures.

In particular they will:

- advise managers and supervisors at BFK sites, depots and offices of statutory health and safety requirements
- provide assistance in the preparation of risk assessments and in the development of project management plans
- liaise with senior managers by attendance at systems review meetings
- provide support in their role as a BFK representative with respect to the principal contractor's duties under CDM
- regularly inspect BFK work locations and activities, preferably accompanied by a senior member of the site staff
- verify that temporary works procedures are implemented
- implement and promote the Beyond Target Zero behavioural safety programme
- submit inspection reports to the agent with copies to the relevant construction manager and health and safety manager
- monitor subcontractors during site visits to ensure that safe systems of work are being adopted
- carry out health and safety audits to the audit programme
- ensure that all accidents and dangerous occurrences are thoroughly investigated and

reported detailing causes, conclusions and recommendations to avoid recurrence

- collect all accident book entries for archiving
- assist in the identification of safety training needs for site based personnel and bring these to the attention of managers and training department
- participate in the provision of staff training as directed by the head of health and safety
- assist in the provision of safety training for site operatives
- report in writing monthly to the health and safety manager on the implementation of the policy
- provide site personnel with advice, support and encouragement in order that they may fulfil their duties effectively
- co-operate with the Health and Safety Executive in connection with their site visits
- assist in the production of health related risk assessments
- keep abreast of health and safety legislation
- suggest, communicate and promote initiatives for accident prevention
- set a personal example of safe behaviour

### 3.6 Project Manager

Project Managers are accountable to the Project Director for ensuring that the works are planned and undertaken in such a way as to give foremost regard to health and safety.

Where appropriate they will:

- ensure the site is established to present a professional and safe image
- consider at the planning stage and subsequently as any works proceed any hazardous activities, and define by risk assessment appropriate safe systems of work
- ensure that personnel with the appropriate competency are involved in the risk assessment process
- inform the health and safety department of accidents/incidents/near misses which require investigation in accordance with company procedures
- confirm by regular monitoring, at least weekly, that the policy, procedures and standards are complied with
- satisfy themselves that adequate resources have been provided to enable the work to be undertaken safely
- ensure that all line managers, supervisors and appointees are trained, competent and aware of their responsibilities
- ensure that all personnel attend training courses
- co-operate with the Health and Safety Executive in connection with their site visits
- implement and promote the Beyond Target Zero behavioural safety programme
- implement, monitor and report on the health and safety targets
- verify that procedures for the control of temporary works are implemented
- appoint, in writing, the following, where appropriate
  - first aiders
  - appointed persons (lifting)
  - COSHH co-ordinator
  - fire safety co-ordinator
  - electrical safety co-ordinator
  - buried and overhead services co-ordinator
  - temporary works co-ordinator
  - plant co-ordinator
  - office safety Supervisor
- ensure that all statutory registers, reports, records, certificates, notices, placards, and posters are properly maintained and/or displayed
- ensure that health and safety records are maintained
- confirm through regular meetings with the client, BFK personnel, subcontractors and the visiting health and safety advisor that satisfactory arrangements for health and safety are in place and their effectiveness is kept under review
- ensure that health and safety policy, guidance and procedures are kept up to date and made available for reference to all managers and supervisors on site
- ensure that adequate arrangements are made for engagement with the workforce on health and safety issues
- arrange for the provision of safety induction training, toolbox talks and method related briefings
- ensure that personal protective equipment needs are assessed and that an adequate supply is available, issued and properly used and that the issue is recorded
- arrange for the provision of adequate welfare facilities and first aid
- assist the health and safety manager to investigate, record and report on all accidents and dangerous occurrences and ensure that remedial measures are taken to avoid recurrence

- advise the health and safety manager promptly of visits by the regulatory authorities (HSE, EHO, Fire Brigade, etc) of any comments or recommendations and of any remedial measures taken. In the event of an improvement or prohibition notice being served the project director and health and safety manager must be informed immediately
- ensure the security of the works/depot/office to prevent unauthorised access
- when employing a contractor ensure that they have adequate health and safety arrangements in place prior to work commencing. Then monitor their activities to ensure compliance with agreed arrangements
- return all health and safety documentation to the health and safety advisor at agreed intervals
- when BFK is appointed principal contractor, the Project Manager will:
  - undertake the role of BFK representative with respect to the principal contractor's duties under CDM
  - prepare a project management plan taking into account any pre construction information which sets out the arrangements for the management of health and safety on site and review the plan at regular intervals
  - provide the CDM co-ordinator with any relevant information for inclusion in the health and safety file
  - collate risk assessments made by subcontractors and other contractors and make arrangements to convey the relevant information to those at risk
  - prepare, communicate and display safety rules and make arrangements to ensure that they are observed by all personnel on site, including subcontractors, other contractors and the self employed
  - liaise with the emergency services and prepare appropriate emergency procedures
  - ensure adequate provision is made to prevent unauthorised access to site
  - make arrangements for discussion with and taking advice from persons at work
  - establish a safety committee where appropriate
- allocate responsibilities and provide support to managers and supervisors on the the project
- ensure that all company occupational health requirements are met in accordance with procedures
- set a personal example of safe behaviour

### 3.7 Construction Manager

Construction Managers are accountable to the Project Manager for ensuring that the works are planned and undertaken in such a way as to give foremost regard to health and safety.

Where appropriate they will:

- ensure the site is established to present a professional and safe image
- consider at the planning stage and subsequently as any works proceed any hazardous activities, and define by risk assessment appropriate safe systems of work
- ensure that personnel with the appropriate competency are involved in the risk assessment process
- inform the health and safety department of accidents/incidents/near misses which require investigation in accordance with company procedures
- confirm by regular monitoring, at least weekly, that the policy, procedures and standards are complied with
- satisfy themselves that adequate resources have been provided to enable the work to be undertaken safely
- ensure that all line managers, supervisors and appointees are trained, competent and aware of their responsibilities
- ensure that all personnel attend training courses
- co-operate with the Health and Safety Executive in connection with their site visits
- implement and promote the Beyond Target Zero behavioural safety programme
- implement, monitor and report on the health and safety targets
- verify that procedures for the control of temporary works are implemented
- ensure that all statutory registers, reports, records, certificates, notices, placards, and posters are properly maintained and/or displayed
- ensure that health and safety records are maintained
- confirm through regular meetings with the client, BFK personnel, subcontractors and the visiting health and safety advisor that satisfactory arrangements for health and safety are in place and their effectiveness is kept under review
- ensure that health and safety policy, guidance and procedures are kept up to date and made available for reference to all managers and supervisors on site
- verify, in conjunction with the plant department, that persons who operate plant,

- 
- machinery and equipment are competent and adequately trained
- arrange for the provision of safety induction training, toolbox talks and method related briefings
  - identify operative and staff training needs and arrange training provision with the training department
  - ensure that personal protective equipment needs are assessed and that an adequate supply is available, issued and properly used and that the issue is recorded
  - arrange for the provision of adequate welfare facilities and first aid
  - assist the health and safety manager to investigate, record and report on all accidents and dangerous occurrences and ensure that remedial measures are taken to avoid recurrence
  - advise the health and safety manager promptly of visits by the regulatory authorities (HSE, EHO, Fire Brigade, etc) of any comments or recommendations and of any remedial measures taken. In the event of an improvement or prohibition notice being served the project director and health and safety manager must be informed immediately
  - ensure that defects noted in safety inspection reports are properly remedied
  - ensure the security of the works/depot/office to prevent unauthorised access
  - when employing a contractor ensure that they have adequate health and safety arrangements in place prior to work commencing. Then monitor their activities to ensure compliance with agreed arrangements
  - return all health and safety documentation to the health and safety advisor at agreed intervals or on contract completion
  - allocate responsibilities and provide support to managers and supervisors on the the project
  - ensure that all company occupational health requirements are met in accordance with procedures
  - set a personal example of safe behaviour

### **3.8 Managers, Supervisors and Foremen**

Managers, supervisors, general foremen and foremen are accountable to their line manager for the implementation of the policy.

In particular they will:

- ensure the site is established to present a professional and safe image
- ensure that all work activities are adequately supervised by trained and competent Persons
- implement and promote the Beyond Target Zero behavioural safety programme
- provide health and safety induction to all operatives under their control, including subcontractors and the self employed
- conduct a programme of tool box talks and method statement briefings for all operatives under their control
- establish and maintain places of work, access and egress that are safe and without risk to health
- ensure that subcontractors conduct their activities in a safe manner and comply with safety rules and procedures
- encourage operatives to report any near misses, hazards observed and any defects in plant or equipment
- address any hazards reported or observed and take out of service any defective plant or equipment
- ensure that all plant and equipment used on site is safe, free from defect and has the required statutory certification
- confirm that all plant operators possess a valid certificate of training for the class of plant to be operated
- ensure that day to day lifting operations are controlled as defined by the appointed person (lifting)
- be responsible for the control of workplace transport in their areas of work
- ensure that personal protective equipment is provided and used as required by the site rules and procedures
- maintain a tidy site by arranging for the safe storage of materials and equipment and disposal of waste
- arrange for welfare facilities to be maintained in a clean and tidy condition
- reduce the need for manual handling, and ensure that any remaining manual handling tasks are undertaken only by trained workers of proven fitness
- use the BFK disciplinary procedures when appropriate to ensure compliance with health and safety law

- co-operate with health and safety advisors in all health and safety matters
- ensure that those with health restrictions are allocated appropriate tasks
- set a personal example of safe behaviour

### 3.9 All Employees

It is the statutory duty of all employees to comply with sections 7 and 8 of the Health and Safety at Work Act, ie:

- to take reasonable care for the safety of themselves and of any other person who may be affected by what they do or fail to do at work
- to co-operate with their employers or any other persons in the performance of their statutory duties
- not to misuse or interfere with anything provided in the interests of health, safety or welfare

All employees must also comply with the requirements of this policy and co-operate with BFK in its efforts to prevent accidents and ill health.

In particular they will:

- read and comply with the location rules
- behave in a responsible manner at all times
- develop and demonstrate a personal concern for the health and safety of themselves and others
- report all accidents, incidents and near misses to their line manager or health and safety manager as appropriate.
- report damage to plant and equipment to their immediate supervisor
- use only that plant and equipment for which they have received training and authorisation
- use and look after the protective equipment provided and report to their supervisor when it becomes worn or defective
- ensure that any personal injuries are recorded in the accident book
- propose to their immediate supervisor ways of eliminating hazards and improving safety at their workplace
- attend health surveillance when instructed
- set a personal example of safe behaviour

### 3.10 Sub-Contractors Employed by BFK

All contractors working on BFK premises or on any site where BFK has been appointed principal contractor will at all times co-operate with BFK rules and procedures.

They will in particular:

- attend a site health and safety induction
- take reasonable care for the safety of themselves and of any other persons who may be affected by what they do or fail to do at work
- provide the agent with a copy of their health and safety policy and any risk assessments, procedures and method statements relating to the work to be undertaken
- ensure that their activities are conducted safely, without risk to health, and in accordance with all relevant health and safety legislation
- ensure that all accidents, injuries or near misses sustained as a result of their activities are recorded and reported to BFK
- provide trained and competent operatives, and ensure their attendance at any training course arranged by BFK
- ensure that their employees and supervisors are provided with the appropriate personal protective equipment and that it is used as directed
- ensure that their employees co-operate fully in emergency drills
- co-operate with BFK health and safety advisors during inspections and audits
- conform to the requirements contained in the BFK Induction
- contractors' Will cooperate with company rules and systems for managing health and safety.
- set a personal example of safe behaviour

### 3.11 Visitors on BFK Premises

In order to ensure their safety and well being, all visitors to BFK premises must:

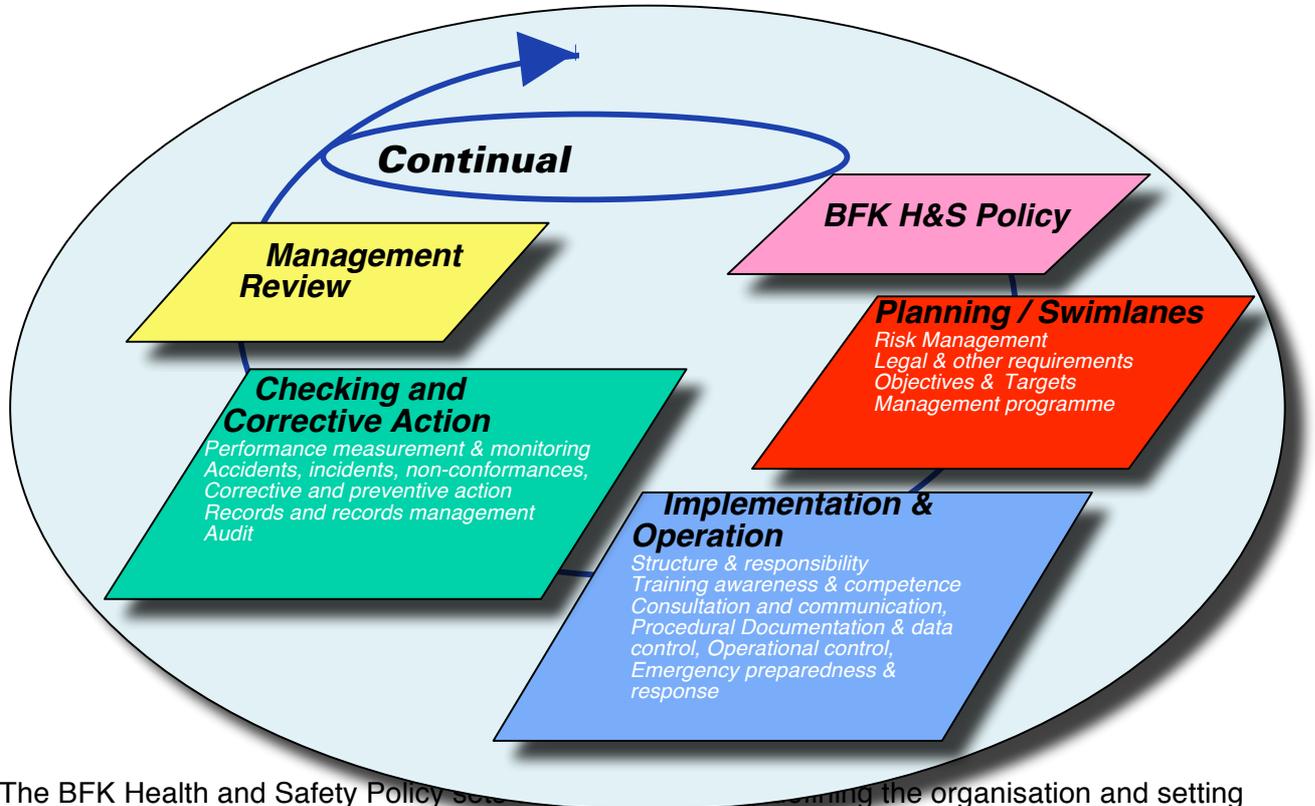
- attend a visitors site health and safety induction
- report to the BFK office and sign the visitors book
- not enter any working areas unless accompanied by a member of staff

- 
- observe at all times BFK safety rules and any site safety procedures
  - wear the safety clothing and equipment provided and any additional personal protective equipment as instructed
  - report any accident or injury to BFK.

## 4.0 Safety Management System

### 4.1 Safety Management System

BFK's overall methodology for managing Health and Safety activities across all aspects of its operations is based on OHSAS 18001 and is represented in outline in the figure below. The Safety Management System (SMS) provides the means for implementing the Health and Safety Policy.



The BFK Health and Safety Policy sets out the vision, mission, and aims of the organisation and setting down the management structures and arrangements for delivering the Policy.

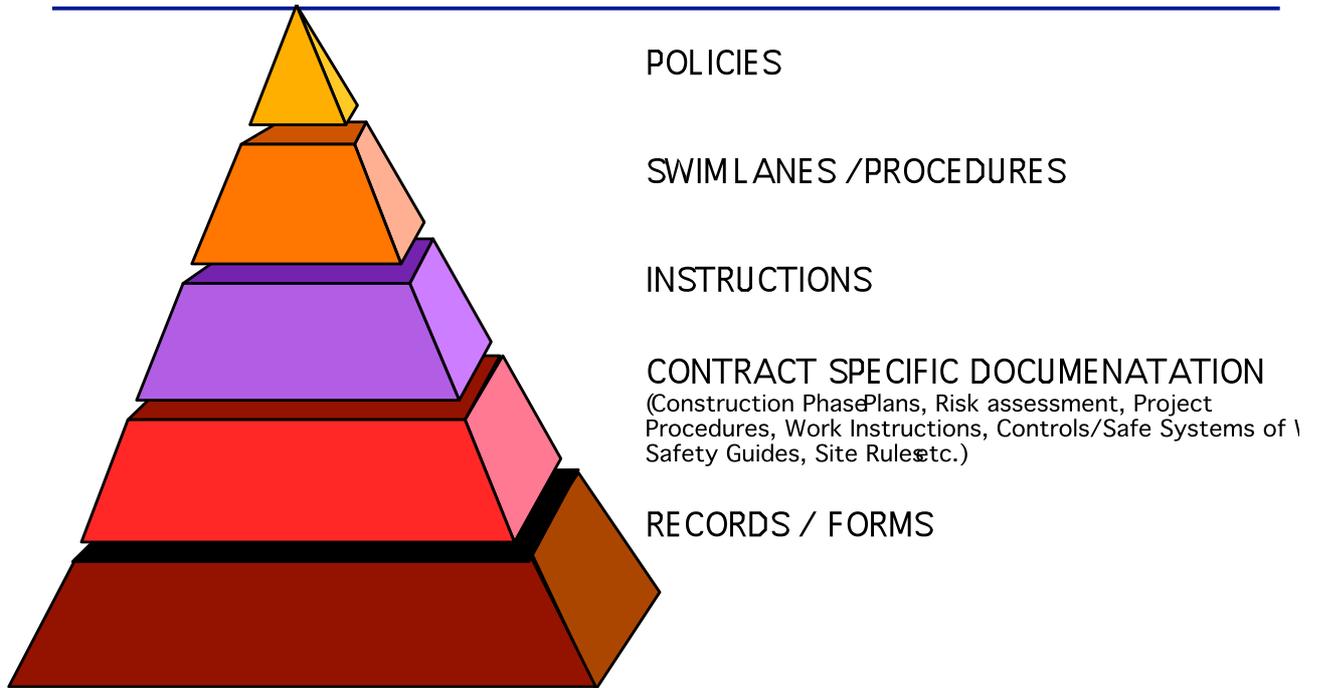
Planning uses Swimlanes and Procedures which respond to Legal requirements, company policy and good management practice.

The implementation and operation of the BFK Policy is defined in the Safety Management System (SMS), Swimlanes with written procedures, instructions, and local arrangements for managing Health and Safety.

Compliance with Policy and performance is checked by means of a continuous programme of monitoring. Corrective actions are issued whenever performance fails to comply with standards. Data from the monitoring and Audit programme is used to update Key Performance Indicators (KPI's).

Management review assesses the effectiveness of the Health and Safety Procedures and Standards and identifies areas requiring improvement. The Board of Directors regularly reviews the effectiveness of the SMS with the objective of ensuring continual improvement of the system.

### 4.2 Tiers of Documentation



In accordance with the requirements of OHSAS 18001, BFK has established and implemented a hierarchy of documentation to describe the SMS.

**Policies:** Set the direction for the company by providing a framework for health and safety. Defines the organization, management structure and arrangements and contains commitments to comply with legislation, other regulations and to continual improvement.

**Swimlanes and Procedures** are developed in an electronic flowchart format and describe safe work process activity, requirements, responsibilities, activity input and output and shows supporting Work Instructions.

**Work Instructions** are developed to describe and implement safe systems of work instruction for specific activity and task operations and are hyperlinked on the Swimlanes.

**Contract Specific Documentation** will be incorporated within the Swimlane system.

**Records and Forms** are hyperlinked to Swimlanes for ease of access.

## 5.0 Arrangements for implementation

### 5.1 Health and Safety Leadership

BFK shall utilise the Beyond Target Zero accident programme to ensure the provision of leadership training that will allow employees in positions of leadership to positively reinforce safe behaviours that prevent injuries, and to coach/ discuss at risk behaviours that may contribute to injuries or incidents.

The leadership teams shall be familiar with the content of the Health and Safety Commission/ Institute of Directors publication entitled “Leading Health and Safety at Work” which sets out an agenda for the effective leadership of health and safety. Its essential principles are as follows:

- Strong and active leadership from the top:
  - Visible, active commitment
  - Establishing effective downward communication systems and management structures
  - Integration of good health and safety management with business decisions
- Worker involvement:
  - Engaging the workforce in the promotion and achievement of safe and healthy conditions
  - Effective upward communication
  - Providing high quality training
- Assessment and review
  - Identifying and managing health and safety risks
  - Accessing and following competent advice
  - Monitoring, reporting and reviewing performance

BFK shall utilise safety climate tools and employee satisfaction measures such as behavioural safety, benchmarking, recognition and other mechanisms to create, embed and sustain an effective health and safety culture.

Directors and Senior Managers should be aware that they can attract personal liability and be subject to prosecution under the Health and Safety at Work etc. Act 1974 section 37 in circumstances where they have consented or connived with an offence committed by their employer, or where that offence is attributable to any neglect on their part.

### 5.2 Competence Fitness and Training

BFK has legal duties under Regulations 4 and 13 of CDM to ensure that employees and sub-Contractors are competent and fit to undertake their work and have received training for specific tasks and use of specific work equipment. Copies of training records will be available at the worksite. BFK will implement the policy that all site personnel will receive site safety awareness training and hold current CSCS or affiliated certification. Personnel working on or about the operational railway will be required to be in possession of current and appropriate track safety training certification.

In addition to all accidents, incidents and hours worked being recorded and reported, BFK, will submit a Period based work package health and safety report on specific inputs and controls in the areas of compliance, standards, behaviour and culture.

Competence through knowledge, training and information is one of the key steps within the Crossrail zero accident culture. BFK have a training regime in place so as to ensure that employees are sufficiently trained and understand the risk controls and behaviours expected. BFK shall produce and implement a training programme that takes account, as a minimum, of tasks, environment, behavioural and cultural influences, language, and best practice/lessons learned. This training programme includes a process of comprehensive briefings that ensures all employees are given a briefing on the task, risks and controls prior to beginning any work activity. Training also incorporates an appreciation that workers can show initiative and go beyond their instructions on a

particular task, and accordingly include instruction on what is to be briefed to workers both in respect of what is and what isn't to be undertaken as part of the task.

### 5.3 People-Based Behavioural Safety Programme

BFK and Contractors shall actively co-operate with CRL in promoting improved health and safety performance through behavioural safety measures. These measures are aimed at influencing desired behaviours and the effective communication of health and safety information. To underpin this approach BFK will implement the Beyond Target Zero behavioural safety programme. This will

be initiated with 2 day commitment workshops which will be followed by the establishment of a Safety Leadership Team comprising a range of project personnel. All personnel will then attend regular half day behavioural safety workshops.

As a key part of this approach, BFK and our Contractors will implement an appropriate number of behavioural observations per Period that fully reflects the scale and nature of the health and safety risks associated with the work activity. Reports shall be shared as a part of routine progress and associated KPI reports provided to BFK. These will then form a part of shared learning across the Programme via the BFK and/ or CRL Contractors Health and Safety Forum. The Stakeholder Forum is chaired by the Health and Safety Director and illustrates the importance assigned to this activity across the Programme.

#### **5.4 Recognition and Reward**

BFK shall develop and implement approved programmes which incentivise personnel and teams at all levels to make a positive contribution to excellent health and safety performance such as near miss reporting and safety observations. Where such initiatives are initiated by BFK and/ or Crossrail, then Contractors must participate.

#### **5.5 Workforce Engagement**

BFK is committed to encouraging positive engagement with the workforce on health and safety matters and recognises that effective consultation and engagement is fundamental for achieving high standards. BFK and its Contractors will develop effective mechanisms for engaging their site personnel in the development and implementation of effective health and safety arrangements. BFK and its Contractors will make appropriate arrangements and each Contractor will advise BFK of the nature and extent of worker engagement initiated based on the following:

- Compliance with statutory requirements
- Operatives understanding that they are permitted to stop work if they feel at risk
- Advising personnel of the mechanisms for reporting health and safety issues within the Contractor's team
- Taking no negative, critical action against any worker for raising a health or safety issue
- Every toolbox talk including an opportunity for operatives to ask questions and make comments
- Operating a consultation mechanism, and bringing this to the attention of all personnel in the Principal Contractor's area of control
- Where applicable, establishing arrangements for nominated Health and Safety Representatives to undertake their important work, and
- Forwarding minutes of formal consultation meetings held at local level to BFK, so that issues relevant beyond the project may be identified and addressed.

#### **5.6 Occupational Health**

BFK believes that an exemplary standard of occupational health across projects is essential in delivering its objectives and can have a positive effect on workforce health where actively managed. Our aspiration is to embed the concept of "fit for life, fit for work and fit for tomorrow".

Achievement in this area incorporates workforce overall wellbeing in addition to absence from illness as a result of their work on our projects. BFK recognise three key areas of occupational effects. These are discussed in the following sections:

- The impact of work on health
- The impact of health on performance, and
- Workforce well-being.

BFK shall minimise the impact of work on health and mitigate against these occupational health areas by:

- Utilising an approved occupational health service provider – Sygol Duradiamond
- Ensure that employees have available occupational health advice and allow for guidance to be given to management on ways of generally reducing the impact of work on health and to give confidential advice to employees where they have concerns
- Utilising occupational health provision for advice towards any incident or accident investigation; to evaluate the occupational health controls utilised and suggest improvements where necessary, and
- Ensuring that their audit and review regime includes occupational health to establish the effectiveness of the systems and guidance being utilised.
- BFK's occupational health service provider will be responsible for managing the health surveillance arrangements across the workforce engaged.

BFK's occupational health service provider will, as a minimum, have agreed occupational health protocols for the following:

- Hand Arm Vibration Syndrome (HAVS) related health surveillance
- Noise health surveillance
- Control of Substances Hazardous to Health (COSHH) health surveillance, where a situation has been identified where surveillance is deemed necessary
- Respiratory health surveillance, and
- Dermatological / skin health surveillance.

## 5.7 Alcohol and Drugs

There is a mandatory alcohol and drugs policy that applies to persons working on the Crossrail Programme. No alcohol or drugs shall be consumed by personnel on sites or offices, nor shall any such personnel report for work whilst under the influence of alcohol or drugs.

BFK shall carry out annual, random, unannounced and for cause testing of workers for alcohol and drugs in certain circumstances.

Persons suspected of being under the influence of alcohol and/ or drugs shall be refused entry to site or required to leave site. In accordance with the agreed policy in respect of testing, such individuals will be subject to testing.

Possession of illegal drugs, possession with intent to supply illegal drugs, and supplying illegal drugs are criminal offences. Possession whilst at work and/ or supply of illegal drugs whilst at work by all personnel is prohibited. Any worker found to be contravening this requirement will be reported to the police and removed from site. The status of any Contractor who is believed to have permitted their worker to possess or supply illegal drugs at work will be subject to review and probable exclusion from future works.

All Contractor personnel who are safety critical and are under any form of prescription medication shall advise BFK's occupational health service provider without delay and comply with any direction given.

BFK shall also ensure that adequate processes are in place to allow for undertaking of "for cause" drugs and alcohol testing of any person where it is deemed necessary as part of an investigation.

## 5.8 Risk Management.

BFK and our Contractors have a statutory duty to carry out suitable and sufficient risk assessments and to co-operate with other organisations working on or about CRL worksite locations.

Contractors are required to undertake suitable and sufficient assessment of the health, safety and fire risks involved in work activities and to implement appropriate preventive and protective

measures.

BFK and Contractors shall consider transport and plant movements on and off-site and how they may impact third parties and the general public i.e. abnormal loads and traffic routes past sensitive locations such as schools. These aspects shall be detailed in the Traffic Management Plan which should in particular include the following, where applicable:

- A dynamic risk assessment to take account of the changing site conditions
- Implementation and status of traffic routes
- The importance of vehicle and pedestrian segregation
- Restricted use of vehicles by authorised persons only/ driver competence and training
- Use of one way systems
- Safe access and loading/ unloading, and.
- The significant risks identified in the Health and Safety Executive Publication entitled "Protecting the Public" (reference HSG 151).

Contractors shall submit to BFK all health and safety risk assessment and method statement information for review and comment.

Where work is covered by generic risk assessments, copies of these shall be provided in the Construction Phase Plan prior to start of work. During the works the Contractor shall provide BFK with copies of task-specific risk assessments for any works outside the scope of the generic risk assessments provided.

For work items involving significant risk where a safe system of work is required and for all activities involving safety risks to the public or third parties, contractors shall provide BFK with task and location specific method statements.

## 5.9 Construction Phase Plans

The detailed arrangements for complying with the Crossrail Standard shall be included in the BFK's health and safety plans and associated method statements. These shall be based on comprehensive risk assessments incorporating legislative and planning requirements. The health and safety plans shall be submitted to Crossrail and the appointed CDM Co-ordinator in good time in advance of planned commencement of work/ first phase of the work.

### 5.10 Risk assessments and method statements

BFK and Contractors are required, for individual processes, to develop and maintain risk assessments and method statements that:

- Note adequately the hazards and risks advised by other Contractors including designers, the CDM Co-ordinator and others
- Identify hazards and evaluate significant risks associated with the site and work activity
- Develop methods for dealing with those hazards (e.g. employ a hierarchy of elimination, substitution) with a focus on arrangements designed to protect all construction personnel and others who may be exposed
- Document methods for risk control in the form of risk assessments and associated health and safety plans and method statements
- Develop and adopt method statements that address sequencing, work methodology and controls/ precautions to protect site personnel along with anyone else who may be affected
- Maintain the risk assessments and associated health and safety plans and method statements incorporating and communicating any changes required to reflect changes such as those associated with site conditions and work scope
- Propose amendments to the hazard and risk register
- Communicate the risk control arrangements to the BFK and Contractor's own personnel, to Crossrail, to the CDM Co-ordinator and others who may require this information for their own safety and security and to ensure efficient operations
- Review training plans including toolbox talks with reference to risk control. Ensure that changes are communicated appropriately
  
- Include a briefing on applicable method statements to all personnel at the point that they commence the work covered by each method statement and provide update briefings where a method statement is amended or otherwise where the risks merit re-briefing at regular intervals, and
- Throughout this process for developing and implementing risk management arrangements, to ensure effective liaison with the CDM Co-ordinator and the active engagement of the integrated team.

BFK and Contractors shall address the following issues, taking into account the information provided:

- Project-wide issues including fire, site transport, slips, trips and falls and welfare facilities
- Health hazards including asbestos, noise, vibration, hazardous substances, musculoskeletal issues, leptospirosis, waste storage and handling
- Safety issues associated with higher risk activities e.g. temporary works, work at height, works below ground, confined spaces, demolition, working adjacent to moving plant & machinery, lifting operations, wharfs & river work
- Management issues including responses to accidents, incidents and emergencies, and
- Support leadership culture including behavioural safety activity, leadership tours and other initiatives.

### 5.11 Accident/ Incident Reporting and Investigation

BFK shall report any accidents or incidents arising from the works in addition to the Contractor's duty to report accidents/ incidents to enforcing authorities. BFK is required to:

- Notify the CRL incident desk of any accidents and incidents and to make the entry into the RIVO Safeguard database in accordance with the timescales in the following table. The CRL 24 hour incident desk number is 020 3197 5000

Level	Notification to the CRL incident desk by telephone (020 3197 5000)	Entry into the RIVO Safeguard database as Incident Report
1	Immediately	By 11:00 the next working day
2	Immediately	By 11:00 the next working day
3	Within 24 hours of incident	During the next working day after the Incident
4	Not required	Within 3 days of the Incident

- Nominate a responsible person tasked with informing the enforcing authorities (and CRL) in relation to matters covered within RIDDOR
- Carry out prompt investigations of significant accidents and incidents and provide CRL with a copy of the investigation report within 5 working days of the incident
- Co-operate with the CRL health and safety teams in incident investigation and follow-up of incidents to identify root causes and lessons learned. This co-operation to include providing access to contract information, evidence materials, documentation, worksite and staff as part of any investigation that CRL may independently undertake
- Provide any documentation, information and reports requested by CRL as part of an investigation to an agreed timescale
- Fully utilise the CRL incident management system for recording of health, safety, security and environmental information, and
- Respond to all comments from CRL on investigations reports, within a reasonable timeframe and implement agreed actions.

## 5.12 Delivery Drivers

Drivers who remain in their cab during site visits (except to visit welfare facilities or offices where adjacent to parking areas) shall receive briefings/induction at the discretion of BFK.

BFK will ensure that where delivery drivers are required to operate their vehicles in operational areas, a suitable and sufficient risk assessment is conducted.

This is especially relevant where significant risks are identified. BFK will schedule delivery times where it is reasonable to do so, in order to mitigate any risk(s) posed by possible conflict with the programmed works.

As a minimum, drivers shall be provided with a short briefing and a supporting document outlining their duties, site traffic control arrangements and related matters.

Drivers who are required to work on site outside of their cabs, for example to assist in sheeting up vehicles and/or who shall operate their vehicles in construction operational areas and not be restricted to designated locations, shall either be holders of a valid CSCS card or affiliated certification and required to attend a full site induction or be under appropriate supervision at all times. In any event drivers will require relevant security clearance in accordance with the project security requirements.

Additional driver training in vehicle safety in alignment with UK best practice will be implemented by BFK where risk assessed as necessary.

As far as practicable vehicles and pedestrians shall be separated on site, and suitable controls and precautions employed where necessary crossing points and shared areas are identified. Roadways on the site shall be defined by signage and visual appearance. As far as practicable, site roadways and usage shall be designed and designated to reflect the general rules of the road and incorporate good sight lines and geometry. Where appropriate, barriers shall be used to maintain separation between vehicles and pedestrians and marked crossing points established at which drivers are required to give way to pedestrians. Site roadways shall have designated speed limits and these shall be indicated with appropriate signage. BFK shall ensure that every driver is aware of this limit, and all contractors shall cooperate to ensure compliance.

## 5.13 Machinery and Plant

All machinery and plant used by or on behalf of BFK shall be properly selected to ensure it is fit for

purpose, sited in an area suitable for its safe use, maintained and inspected properly and used only by competent operatives. Records of formal inspections shall be maintained in accordance with the Provision and Use of Work Equipment Regulations and Provision and Use of Work Equipment procedure.

#### **5.14 Mobile Phones**

Other than in respect of emergency use, mobile phones should be used only in designated areas such as within offices and welfare/ rest areas. Care must be taken to ensure that phone use does not create risks to the user or others. Users should be aware of the legal implications and ramifications of mobile phone use which creates risk to the health and safety of themselves and others, and the need to co-operate with their employers and other persons in this area. The use of personal radios and portable audio equipment are prohibited on any BFK worksites.

#### **5.15 Emergency Measures**

All BFK offices, projects and worksites will have adequate emergency arrangements which are known and readily available to those that may require them. This will include fire and emergency plans. Plans include BFK's arrangements for dealing with reasonably foreseeable contingencies, addressing:

- Notifications and reporting, including notification as soon as possible to Crossrail
- Arrangements to mitigate any incident, minimising harm arising
- Recovery arrangements
- Investigations, detailed report preparation and lessons learnt.
- Participating in training exercises, desktop and drills to ensure emergency response preparedness is effective.

The above arrangements will take into account CRL's project-wide incident management arrangements for responding to and reporting accidents and incidents.

#### **5.16 Welfare**

All new employees of BFK shall complete a pre-employment medical questionnaire which will be reviewed by the Human Resource department. When a new employee presents with information appertaining to his/her health that may impact on their Health and Safety or that of others, Human Resources shall share this information with the employees Line Manager and the Health and Safety Team. This shall lead to a Risk Assessment being undertaken the controls from which will determine how the employee may work safely.

In the event of an employee or person working under the management of BFK presenting with a recognized industrial disease, arrangements for the control of this situation will be managed in accordance with the BFK Procedure: Incident Investigation, Nonconformity, Corrective Action and Preventative Action.

Regular health check service shall be offered to all BFK employees to provide them with an opportunity to evaluate the status of their health and where required provide a personal service for health improvement advice and initiatives.

Where appropriate, Hygiene Measurement, Ergonomic or Psychological studies that may be required (assessed on the basis of risk), will be outsourced to external specialist providers.

The BFK health and safety team may accompany any outsourced specialist during their undertakings, will review the findings and reports of all measurements and studies undertaken making appropriate recommendations and where applicable amendments to the Safety Management System.

#### **5.17 Consultation and Communication**

BFK recognizes that there are various types of Health and Safety information which must be effectively communicated to its employees and those affected by its activities. The extent to which the information will be communicated will be dependent upon the residual risk associated with the work activity involved.

BFK shall pro-actively involve the participation of its employees in all aspects of Health and Safety. Specifically it will ensure;

- Employee participation and consultation in hazard identification and risk assessment, leading to the development of control measures.

- Employee participation and consultation in the investigation of injuries, diseases and dangerous occurrences.
- Employee participation in the development of the Health and Safety Policy and Objectives
- Employee participation and consultation when there are changes in operational Health and Safety activities.

BFK will consult with its external interested parties when required in respect of pertinent Health and Safety matters.

### **5.18 Proactive Monitoring and Measurement**

Four proactive monitoring and measurement controls shall be adopted.

These are:

- Site Inspections (Arrangement for Site Inspections shall be identified in Procedure: Inspection, Monitoring, Audit and Review)
- Site Tours (Arrangement for Site Tours shall be identified in Procedure: Inspection, monitoring, audit and Review)
- Visiting Manager Comments shall be recorded in the site register
- System Audits. (Arrangements for Auditing shall be identified in procedure: Internal and External Audit).

#### **Site Inspections**

An Inspection of either a facility (office, depot, workshop etc) or site is defined as a visit to that work place by a named individual(s). The purpose of the visit is to examine; maintenance standards, employee involvement, working practices, and standards of housekeeping and to check that work is being undertaken in accordance with the arrangements of the BFK Safety Management System (SMS).

#### **Site Tours**

A Tour is a scheduled recorded examination of a work area carried out by either a designated Director or Senior Manager of BFK. The Director or Senior Manager may request the local Site Safety Advisor and representatives from the local management team to accompany him/her on the Tour, but this is not a mandatory requirement.

On the Tour the Director or Senior Manager shall ensure that for instance; standards of housekeeping are at an acceptable level, fire protection measures are being observed and maintained and personal protective equipment is being used correctly. During the Tour, checks will also be made to ensure that work is being undertaken in accordance with the arrangements of the BFK Safety Management System (SMS) and that the Health and Safety Objectives are being met.

Directors and Senior Managers will also gauge the extent of the safety culture apparent at the site. This will be evaluated on the basis of the visual observations made, and also by taking account of comments and observations made by individual employees during questioning

#### **Visiting Manager Comments**

All visiting managers to BFK projects are required to provide feedback on the general health and safety observed during their visit as well as officially recording their presence on-site. Feedback shall not be required if completing a Tour Report.

#### **System Audits**

The Lead Auditor shall prepare an Annual Audit Programme for BFK. This will be reviewed by the Health and Safety Manager and approved by the Project Director. The Lead Auditor shall insure that audits are undertaken and completed in a timely manner.

Before the audit is performed, the auditor will prepare by reviewing the associated controlling documentation as well as considering evidence of performance from; Site Inspections, Directors and Senior Managers Tours, Incident Reports and Reports from previous Audits.

The audit may then be undertaken in accordance with Procedure: Internal and External Audit.

### **5.19 Records**

Copies of relevant and appropriate health and safety information and records identified by BFK will be retained and archived, as defined in Procedure: Control of Records. These will be legible, identifiable and traceable to the activities involved and maintained so that they are easily retrievable and protected against damage.