NORTH LONDON WASTE AUTHORITY

REPORT TITLE: HEALTH SAFETY AND WELLBEING STRATEGY

REPORT OF: PROGRAMME DIRECTOR

FOR SUBMISSION TO: PROGRAMME COMMITTEE

DATE: 2 March 2020

SUMMARY OF REPORT:

This report covers the proposed strategy for health, safety and wellbeing on the North London Heat and Power Project.

RECOMMENDATIONS:

The Committee is recommended to note the approach set out in the Health, Safety and Wellbeing Strategy in Appendix A.

SIGNED: Programme Director

DATE: 19 February 2020

1. INTRODUCTION

1.1. The North London Heat and Power Project (NLHPP) team are currently developing and implementing a programme manual - a suite of documents designed to guide successful delivery of the programme. Within this, a series of strategy documents will form the top level of the manual defining the challenges to be addressed, and the strategic approaches to meeting these. The initial set of strategies identified for development and their outline purpose is included as below.

| Strategy | Outline Description | |
|----------------------------|---|--|
| Resourcing | Addresses the need for people, assets and funds. | |
| Health, Safety & Wellbeing | Considers all aspects of keeping all parties associated with the NLHPP safe and well | |
| Technical Assurance | Addresses how the Authority will oversee the development of the technical solution and design development | |
| Commercial | Considers the procurement and subsequent delivery of contracts | |
| Risk Management | | |
| Monitoring & Control | & Considers aspects associated with scheduling, controlling costs and reporting on the programme. | |
| Information Management | Looks at the control of our information, data and knowledge. | |
| Stakeholder Engagement | Addresses the challenges associated with the range of stakeholders in the programme. | |
| Financing | Considers the challenges associated with planning, obtaining and managing the necessary financing for the programme | |

| Strategy | Outline Description |
|----------------------------|--|
| Social Value | Looks at the aspects of social and community benefits that the works will bring. |
| Construction Management | Deals with the core construction activities and the challenges linked to interfaces, operational site working and logistics. |

Table 1 - List of NLHPP Strategy Documents

1.2. These strategies will be provided to Members at suitable opportunities to enable an understanding of challenges within those elements of the project, and how the project team will address them.

2. HEALTH, SAFETY AND WELLBEING PROGRAMME DEVELOPMENT

- 2.1. The Project Health & Safety lead has initiated a programme to further develop the Authority-led Health, Safety and Wellbeing (HSW) management in advance of the increased volume of construction work expected during 2020 and beyond. The purpose is to develop the role of the Authority and actions to be taken by the team as the client across the programme, to drive the highest standards of performance by the contractors and suppliers. The programme will define an assurance and monitoring system which will raise standards across the whole delivery team to achieve our ambition of 'zero incidents'.
- 2.2. A strategy has been created to ensure that excellence in health, safety and wellbeing is delivered. This strategy is described in more detail in Section 4 of this report. However, the fundamental essence of the Development Plan is as follows:
 - 2.2.1 Firstly, the Project team will lead by example and consistently demonstrate an all-encompassing commitment to Health Safety and Wellbeing.
 - 2.2.2 Secondly, every person on the project will be invited to contribute in any way they can to increasing their and others' awareness of health, safety and wellbeing. They will be encouraged to take action whenever they feel it appropriate to prevent poor practice when they see it and similarly to recognise and applaud good practise when it occurs. There is a training and awareness programme to facilitate this.
- 2.3. The first step in this process is to put in place a process to survey our current understanding and attitudes to health, safety and wellbeing so that we can determine how good we are now and re-survey at a later date to monitor improvements over the programme period; this is imminent. Further surveys will determine how well and how quickly we are improving.
- 2.4. Following this survey, the Development Programme activities will be rolled out over the next few months.

3. HEALTH, SAFETY AND WELLBEING STRATEGY

- 3.1. The purpose of the health, safety and wellbeing strategy is to ensure that the NLHPP programme sets appropriately high standards and has the commitment and facilities sufficient to deliver the project's vision.
- 3.2. This strategy highlights the challenges faced by NLHPP in this context. Key aspects relate for example, to the lack of large construction experience of the Authority; the range of construction activities being and to be carried out; the numbers of different construction companies that will be involved; the longevity of the programme; and the impact of changing personnel and technology over such a period.
- 3.3. A further exercise is to set SMART (Specific, Measurable, Achievable, Realistic, Timely) objectives (particularly the measuring of positive health, safety and wellbeing characteristics) so that improvements can be monitored and maintained.
- 3.4. In order to monitor the implementation and effectiveness of the health, safety and wellbeing strategy we have a team of expert health, safety and wellbeing advisors. They will monitor on a weekly basis the performance of the construction contractors who are already carrying out works. We also have further resources that will be mobilised when further contracts are let. This is expected to be within few weeks.
- 3.5. The strategy covers the following points
 - 3.5.1 The programme will be aimed at maturing the Authority management team's attitude and commitment to achieving HSW excellence on the Project (i.e. how we feel),
 - 3.5.2 developing the Authority team's HSW leadership controls, communications, etc to positively influence standards and performance of others (i.e. how we are seen by others), and
 - 3.5.3 to define the actions associated with delivering 2.4.2) and 2.4.3), especially those which are "leading" indicators of a positive approach to HSW, and what data/statistics we will collect and act upon (i.e. how we act). Further detail contained in the strategy, which is at appendix A.
- 3.6. The model we are using for the development of our health, safety and welfare performance is based upon the Health and Safety Executive (Keil Centre) maturity model. It has five levels:
 - 3.6.1 Emerging Level 1. Safety is defined in terms of technical and procedural solutions and compliance with regulations.
 - 3.6.2 Managing Level 2. The accident rate is average; safety is perceived solely in terms of adherence to rules, procedures & controls.
 - 3.6.3 Involving Level 3. Accident rates are low but have reached a plateau. The involvement of the frontline employees in health and safety is recognised as critical

- 3.6.4 Cooperating Level 4. All and especially frontline staff accept personal responsibility for their own and others' health and safety
- 3.6.5 Continually improving Level 5. HS&W is a core company value (but paranoid that the next accident is just around the corner). All employees share the belief that health and safety is a critical aspect of their job and accept that the prevention of non-work injuries is equally important.
- 3.7. Our estimation is that we are currently satisfying level 2:

Level Two: Managing. The organisation's accident rate is average for its industrial sector, but they tend to have more serious accidents than average. Safety is seen as a business risk and management time and effort is put into accident prevention. Safety is solely defined in terms of adherence to rules and procedures and engineering controls. Accidents are seen as preventable. Managers perceive that the majority of accidents are solely caused by the unsafe behaviour of front-line staff. Safety performance is measured in terms of lagging indicators such as Lost Time Injury (LTI) and safety incentives are based on reduced LTI rates. Senior managers are reactive in their involvement in health and safety (i.e. they use punishment when accident rates increase).

- 3.8. Our ambition is to achieve and consistently deliver Level 5. The pivotal point in this is the transition from a reactive, regulatory compliant attitude to one where everyone involved in the project has a personal commitment to health, safety and wellbeing and accepts responsibility not only for their own welfare but also recognises that they can, and must, contribute to others. This turning point from individual to group think is reflected in the Maturity Model Levels 3 and 4 where 'the involvement of all employees in health and safety is recognised as 'critical' and 'all staff accept personal responsibility for their own and others' health and safety' respectively.
- 3.9. To facilitate this the NLHPP health & safety lead is preparing a training and awareness programme that will mobilise all staff and give them the necessary skills and understanding of construction health, safety and wellbeing issues to allow, and encourage, them to comment on and contribute to the performance of the project. The key element of our strategy is to engage with and get the involvement of everyone.
- 3.10. With regard to the procedural aspects of our development programme, we have the HS&W Contractor's Requirements Plan which is already completed and presented to the contractors as our standard for a health, safety and wellbeing 'Best Practice Reference Document'. We expect them to hold these same ambitions for the Project.
- 3.11. The second element is the health, safety and wellbeing Assurance Plan which describes to the contractors the mechanics of how we will monitor and assess their performance.
- 3.12. The development and implementation of the Management and Assurance Plans will be delivered as a change programme to ensure it is properly embedded in the Project delivery. This programme is expected to last several months.

3.13. The strategic approach to meeting these challenges is based upon the principles of best practice. The risks, the resources required, and the stakeholders involved are presented in detail in the Health, Safety and Wellbeing Functional Strategy in Appendix A.

4. NEXT STEPS

- 4.1. This Health, Safety & Wellbeing strategy is supported by a suite of management plans and processes which are in varying stages of development or implementation, but which detail the specific methods, systems and roles required to deliver our strategies.
- 4.2. The strategy will be reviewed on a regular basis and updated to reflect the changing environment of the programme and its external environment. Updates will be provided to Members as they are brought into use.

5. EQUALITIES IMPLICATIONS

5.1. The strategy considers the need for all information to be accessible to stakeholders with disabilities and the use of appropriate tools for this purpose.

6. COMMENTS OF THE LEGAL ADVISER

6.1. Comments of the Legal Adviser have been incorporated into the report.

7. COMMENTS OF THE FINANCIAL ADVISER

7.1. The Financial adviser has been consulted during the preparation of this report and all comments have been incorporated.

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APPENDIX A: HEALTH SAFETY & WELLBEING STRATEGY





North London Heat and Power Project Health, Safety & Wellbeing Strategy

| Document Details | |
|--|---|
| Document Number NP-NLW-XXXX-XXX-PC-PM-090020 | |
| Confidentiality Level | Confidential (top confidentiality level) Restricted (medium confidentiality level) Internal use (lowest level of confidentiality) Public once finalised (everyone can see the information) |
| Revision No: | 3 |

| | Assurance Record | | | |
|-----------|---------------------------------------|--------------|----------------|------------------|
| | Owner's Organisational Approval | Author | Check & Review | Approval for Use |
| Name | S Borthwick | P Craddock | N Macdonald | D Cullen |
| Role | Arup PM | H&S Dev Mgr. | Prog Officer | Prog. Director |
| Signature | Soft Boothure | Allmaring | NMacDonald. | Leveleden |
| Date | 18/02/2020 | 18/02/2020 | 18/02/2020 | 18/02/2020 |

| | Revision Record | | |
|-----------------|--|---|--|
| Revision No. | 1)ate 1)escription of Revision | | |
| 1 | 24/01/2020 | Initial draft for HSW function and PMO comments | |
| 2 | 2 29/01/2020 Second draft for leadership team comments | | |
| 3 | 17/02/2020 | Final report for submission | |

| | Engagement Confirmation | |
|---------------------|-------------------------|--|
| Function | For Comment | |
| Programme Director | Consulted | |
| SRO | Consulted | |
| SHE&W | Consulted | |
| LEL | n/a | |
| Technical Advisor | n/a | |
| Technical Authority | Consulted | |
| Programme Office | Consulted | |
| Project Delivery | Consulted | |
| Legal & Governance | Consulted | |
| Commercial | Consulted | |

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1 Context and Vision

The North London Heat and Power Project (NLHPP) is the programme of works authorised by Development Consent Order (DCO) granted in February 2017 through which the existing energy from waste (EfW) plant at the Edmonton EcoPark will be replaced with a new Energy Recovery Facility (ERF). The programme of works includes provision of a Resource Recovery Facility (RRF) for reception and transfer of waste incorporating a public Reuse and Recycling Centre, and EcoPark House (EPH), a visitor centre which will be used to provide community / education space and back up office space. In preparing for and carrying out the works in the NLHPP programme, the management team is working closely with LondonEnergy Ltd (LEL) the operators of the EcoPark and the current EfW plant.

Create a waste management facility in which local communities take pride, which demonstrates value and is a model for public sector project delivery"

The NLHPP leadership team have developed a vision for the programme, highlighted above. Each function of the programme organisation will play a role in delivering the vision and this document, the "functional strategy", sets out the challenges to achieving the vision and the approach to overcoming them.

2 Purpose

This document is the function strategy for Health, Safety and Wellbeing. Its overall purpose is to create a roadmap and methodology which will allow all contributors to the project and all those affected by the project to contribute to its health safety and wellbeing performance.

We are committed to delivering a project achieving zero incidents by putting the health, safety and wellbeing of everyone involved in the project and those working and living in the local community as the number one priority.

3 Starting Point

Currently the project is compliant will all regulatory standards and has an adequate health, safety and wellbeing performance which is as good as, or slightly better than, construction industry norms.

In terms of the Health & Safety Executive (Keil Centre) maturity model we are currently satisfying only levels 1 and 2:

Level One: Emerging - Safety is defined in terms of technical and procedural solutions and compliance with regulations. Safety is not seen as a key business risk and the safety department is perceived to have primary responsibility for safety. Many accidents are seen as unavoidable and as part of the job. Most frontline staff are uninterested in safety and may only use safety as the basis for other arguments, such as changes in shift systems.

Level Two: Managing - The organisation's accident rate is average for its industrial sector, but they tend to have more serious accidents than average. Safety is seen as a business risk and management time and effort is put into accident prevention. Safety is solely defined in terms of adherence to rules and procedures and

engineering controls. Accidents are seen as preventable. Managers perceive that the majority of accidents are solely caused by the unsafe behaviour of front-line staff. Safety performance is measured in terms of lagging indicators such as LTI and safety incentives are based on reduced LTI rates. Senior managers are reactive in their involvement in health and safety (i.e. they use punishment when accident rates increase).

4 Challenges

The programme challenges that this strategy will address are:

| Challenge | Description |
|--|--|
| 1. Lack of experience as a Construction Client | NLWA does not routinely engage in major construction projects and is managing the build as Client directly. Systems to deliver this role are developing. |
| 2. Systems to measure safety performance of contractors not in place | Contractors have their own internal systems, but the Project has no overall system to standardise and feed in to reporting of incidents and status of HS&W maturity. |
| 3. Stated aim of world class safety culture not defined | The project has committed to having a good safety culture, but this is not defined and there is no agreed plan to either define it or achieve it. |
| 4. External stakeholders impacting upon project HS&W | There are numerous interfaces including with LEL and neighbouring businesses which interact with the Project sometimes in unpredictable or negative ways. HSE are also expressing a keen interest in the project. |
| 5. Supply chain management of safety | Subcontract organisations especially short-term transient ones are removed from direct influence by client and are consequently a higher HS&W risk. Having a series of projects and separate procurements means that there may be a range of skills and abilities in HS&W management of contractors and other contributing parties |
| 6. Supply chain management of occupational health/wellbeing | the transient and separate nature of the construction projects and means influence over long-term health issues is difficult |
| 7. Information management | Large, complex project with multiple stakeholders – potential for confusion in accuracy of information, including procedures) |

5 Strategic Approach

The approach to meeting these challenges will be based around the following key areas:

| Area | Explanation | Addresses |
|-------------|---|------------|
| Leadership | Develop management commitment | 1 |
| Ownership | Realise the importance of frontline staff and develop personal responsibility | 1, 3, 6 |
| Involvement | Engage all staff to develop cooperation and commitment to improving safety | 3, 4, 5, 6 |

| Area | Explanation | Addresses |
|--|--|---------------|
| Commitment | Develop consistency and fight complacency | 1, 3, 6 |
| Attitude | Improve the safety culture. Need to get all parties to recognise that they have a facility to influence or affect HS&W ie CDM | 1, 3, 6, 7 |
| Durability | Increase consistency and repeatability of practices and management approach. | 6 |
| Assurance plans and processes | Project to develop compliance, inspection, reporting and audit tools and techniques to illuminate progress, success, weaknesses; informing lessons learned and improvement plans. | 1, 2, 3, 5, 6 |
| Stakeholder/Externals engagement | Both formal and reactive engagement with stakeholders – formally via Project communication structures, reactive by action where necessary. Engagement with industry bodies. Open engagement with enforcement agencies. | 4, 3 |
| Contractual requirements on supply chain | Contract requirements to enable project management and contractors to understand and deliver beyond narrow compliance HS&W performance | 5, 6, 3, |
| Safety culture monitoring and feedback | Tools to be brought in to formally measure safety culture, for analysis of progress, reasons for success/weakness | 3, 1, 5, 6 |

6 HS&W and Supporting Plans

The following HS&W and supporting management plans and documentation will be required to implement this strategy.

| HS&W Plans |
|------------------------------------|
| Health, Safety & Wellbeing |
| Management Plan |
| HS&W Assurance Document |
| HS&W Best Practice Reference |
| Document |
| CDM Health & Safety Risk Register, |
| Pre-Construction Information and |
| Construction Phase Plans |

| ; | Supporting Plans & Documentation |
|---|----------------------------------|
| I | Development Programme |
| (| Communications Plan |
| | Risk Management Plan |
| (| Change Management Procedure |
| | Reporting & Meeting Plan |
| | Digital Strategy/Plan |
| I | Information management plan |
| | Reporting forms |

| HS&W Plans | Purpose | Description |
|--|---|---|
| Health, Safety & Wellbeing Management Plan | The roadmap of what initiatives will take place, their sequence and timescales. | This will allow those involved to anticipate, in conjunction with the communications plan, what will happen and when. It will also allow those involved an opportunity to anticipate plan and resource the work. |
| HS&W Assurance Document | Set out actions on Project team to assure us as client that H&S is being properly managed within team and within contractor organisations | This document contains H&S goals, and the intermediate objectives and targets that will lead to achieving the goals; tasks to support this concept are contained within the document and assigned to team members. Reporting generated by this process. |
| HS&W Best Practice Reference Document | Set out the formal requirements (to meet and exceed legal expectations) on contractors regarding | Document attached to Contract with detailed explanation of Client expectations – contractor safety management systems to be checked against these requirements prior to, and during, their work. |
| CDM Health & Safety Risk Register, Pre- Construction Information and Construction Phase Plans | Single source of truth for health, safety & wellbeing risk information. | This register will record the identification, assessment and monitoring of construction HS&W risks and act as the central record and control document. |

| Supporting Plans & Documentation | Purpose | Description |
|---|---|--|
| Development Programme Communications Plan | Determine, describe what is going to be communicated, to whom, how and when | This document will describe the initiatives associated with the development programme and advise people on how they will be involved and their contributions, It will also show how progress is being achieved and incentivise commitment. |
| Risk Management Plan | Establish the programme-wide agreed approach to managing risk. | The document describes the procedures for risk management across the delivery organisation and for future contractors. All members of the delivery organisation will be expected to follow these procedures. |
| Change Management Procedure | Addresses the challenge of maintain control over scope and the core | Change and risk must be integrated to establish robust control measures for delivery and establish the mechanism by which project managers can draw down against their contingencies. |

| Supporting Plans & Documentation | Purpose | Description |
|----------------------------------|--|---|
| Reporting & Meeting Plan | Providing robust, reliable and timely HS&W information | This plan will set out the timescales and requirements for the NLHPP management reporting structure, within which HS&W will be a core part. |
| Digital Strategy/Plan | Examining opportunities for enhanced recording, management and reporting of HS&W data. | This plan will look at opportunities across the programme to enhance the delivery through use of advanced digital tools and |
| Information management plan | Method of management for Programme Information | Sets out in detail the systems and processes to be used for implementing the programme's information management strategy. |
| Reporting forms | Capture metrics from project activity. | Various forms for reporting and recording metrics on inputs and outputs relevant to accurate measurement of relevant behaviours. |

7 Risks

Potential risks which threaten the successful delivery of this strategy are:

| Description | Planned Mitigation(s) |
|---|---|
| Lack of focus within Project team on HS&W in a busy environment | Use of assurance processes to highlight any deviation/fall back; communications to keep HS&W at the forefront |
| Contractor organisations emphasising production over HS&W | Use of procurement processes to ensure contractors fit the vision; use of assurance processes to monitor progress towards goals; education/communication events and campaigns to keep HS&W as integral to delivery. Reminders that 'Safety First' is a project value. |
| Change in team | Personnel changes present potential to 'drift' in adherence to vision, and progress towards goals |

8 Development

This plan is valid over the period in which the above strategic approach is developing – to end of 2020; for review, feedback and modification at end of 1st Quarter 2020.

9 Resources

In establishing and delivering this strategy and its subsequent management plan, some key resource requirements have been identified:

| Description | Planned |
|-------------|---|
| People | One Health & Safety Development Manager |

| Description | Planned |
|--------------------------|--|
| | One Project Health & Safety Lead Two assurance advisors (1 x full time, one part time and further reserves for site work increasing during life of project) Admin support (varying with level of project activity) |
| Tools | Asite reporting system – incidents/observations Asite reporting system – metrics from contractors |
| Inputs from stakeholders | See section 10. |

10 Functional Stakeholders

A high-level summary of stakeholder interfaces is captured below. A full detailed stakeholder management plan with regards to this function will be prepared within the relevant management plans.

| Stakeholder | Relationship |
|------------------------------|--|
| Programme Office | Consult with HS&W function but need to be aware that what |
| | they do could influence HS&W |
| Governance and Legal | Consider HS&W function |
| Commercial | Consult with HS&W function |
| Finance | No direct contact, but need to be aware that they could |
| | influence HS&W |
| Technical Authority | Consult with HS&W function |
| Professional Advisors | Consult with HS&W function |
| Technical Advisors | Consult with HS&W function |
| Legal Advisors | No direct contact. but need to be aware that what they do |
| | could influence HS&W |
| Planning Advisors | No direct contact. but need to be aware that what they do |
| _ | could influence HS&W |
| Financial Advisors | No direct contact but need to be aware that what they do |
| | could influence HS&W |
| Supply | Accountable to this function |
| Chain/Contractors | |
| Operator/LEL | Consult with and advise/input to HS&W function |
| Officers | No direct contact; to be informed via a third party. |
| Members | Will receive reports; may seek clarifications or explanations. |
| Public | No direct contact; to be informed via a third party. |