

Safety, Sustainability and Human Resources Panel

Date: 16 May 2024

Item: Safety Risk Management on TfL Services

This paper will be considered in public

1 Purpose

- 1.1 Transport for London (TfL) is clear in its public commitments to put safety at the heart of our operations. Our Safety, Health and Environment (SHE) Directorate exists to advise, support and hold to account the business in discharging their legal and policy responsibilities. Strengthening our pan-TfL strategic safety risk management is a key SHE priority and we provide, in this paper, an update on our continuing journey.
- 1.2 The tragic events of the Sandilands tram overturning on 9 November 2016 continues to serve as a constant reminder of the need to put safety at the heart of everything we do. Following the sentencing remarks at the court hearing on 27 July 2023, and a further review of our approach to safety, we brought to the Panel, [on 15 November 2023, our proposals for addressing those concerns](#). These proposals have served to accelerate our ongoing journey to continuously improve systemic, cultural, and organisational safety at TfL and has strengthened our strategic safety risk management approach. We will continue to do everything we can to ensure a tragedy like Sandilands can never happen again.

2 Recommendation

- 2.1 The Panel is asked to note this paper.

3 Managing Safety Risk

- 3.1 We have set an ambitious Vision Zero target for safety improvement, and public transport remains the safest way to travel in London. Our approach combines multiple lines of defence to control the risks that arise from operating transport services, alongside strategic and structural improvements, active assurance of safety and continuous learning.
- 3.2 We are fully committed to strengthening and maturing our strategic approach to safety risk management and are taking steps to make improvements across all modes. In response to the sentencing remarks, we reviewed our programme and accelerated a number of these steps. We will maintain this momentum by continually improving management of safety within our existing programmes – embedding change, continually learning and improving the way we work, aided by simplified tools and by empowering our colleagues, contractors and customers.
- 3.3 Our plan for delivering strengthened safety management focusses on ensuring:

- (a) there is adequate focus on SHE risks throughout the organisation;
 - (b) we have established effective governance with a specific focus on risk management;
 - (c) we are effectively flagging areas of concern with increasing visibility of leading indicators (things that indicate something may happen or needs attention) before an incident or harm occurs;
 - (d) we have confidence in how we diagnose and control our risks;
 - (e) we have sufficient influence over each business area and the wider operating model; and
 - (f) we robustly hold ourselves to account.
- 3.4 Key to achieving this is the principle of 'making safety easy'. We are committed to ensuring progress is built on firm foundations and building/updating systems, tools and guidance that are accessible, easy to navigate, easy to interrogate and relevant/easily updated. We aim to empower our people to effectively manage safety risk appropriate to their role. Progress and performance are regularly monitored within existing governance processes.
- 3.5 In November 2023, we brought to the Panel a number of specific actions addressing the systemic failings outlined in the Sandilands sentencing remarks. These actions were designed to further strengthen and accelerate the progression of our strategic safety risk management and were grouped under six core themes:
- (a) risk identification, assessment and management;
 - (b) governance;
 - (c) Concessionaire management;
 - (d) safety culture;
 - (e) precursors and near-misses; and
 - (f) design and maintenance of assets.

Progress in each of these areas is summarised below.

4 Risk identification, assessment and management

- 4.1 TfL's different delivery models and the evolution of the organisation, means that we have different risk methodologies and processes for different TfL modes as well as our various concessionaires and contractors. To better understand the complexities of this in our operational areas, and to ensure our assessment and management of risk are fully in line with our standards, we have carried out a deep dive review exercise.
- 4.2 Between January and April 2024, we held a series of workshops with operational areas of the business (Bus Operations, Victoria Coach Station, On Demand

Transport and Compliance, Policing, Operations and Security (CPOS)) looking at the identification of hazardous events, leading to refreshed operational risk registers for the Bus business and new high level risk models for Bus Operations, Victoria Coach Station and On Demand Transport. We are now in the process of commissioning new risk models that will support safety decision-making for these parts of our operations.

- 4.3 London Underground already has a very detailed Quantified Risk Assessment (QRA) model that supports our ability to mitigate and control risks alongside other specialist topic assessments and generic assessment frameworks.
- 4.4 Our SHE Management System (SHEMS) underpins our Risk Management framework. In June 2023, we completed a project to update SHEMS, simplifying and deduplicating the system and moving it entirely onto an interactive digital platform. We continue to enhance SHEMS, and ensure individuals are clear on their specific personal accountabilities regarding management of safety risk. We have refreshed the capture and presentation of our legal safety accountabilities, in a simplified way on our SHEMS. Supplementary to this, we have carried out detailed conversations with each Chief Officer who have been briefed on the specific legal accountabilities and regulations that apply to their business area. We have also taken this opportunity to update specific information on Working with Regulators to add to our SHE governance guidance, to ensure the essential basics are understood, followed and cascaded through the organisation.
- 4.5 We are due to update the software package that we use to capture Risk Assessments in the next two years and will use this opportunity to ensure we improve our capture, storage, communication and tracking of assessments. We carried out a full review of the current risk assessment framework with a view to simplifying this where practical. Improvements identified through this process will inform the specification of the new tool.
- 4.6 It is crucial that we hold ourselves to account regarding our management of safety risk. Our Quality, Safety and Security (QSS) Assurance team has reviewed TfL's risk-based assurance planning processes to ensure that the principles (as outlined in the Public Sector Internal Audit Standards) are explicitly documented within the TfL Management System. We have now revised the internal documentation to ensure risk-based planning is clear requirement. Both TfL's Internal Audit team and QSS Assurance team apply this risk-based assurance planning approach.

5 Governance

- 5.1 In addition to regulation by our safety regulators, we ensure that there are relevant layers of internal scrutiny and challenge around safety. The Panel will be aware that ultimate oversight of our performance is provided by the Board. Under the Board structure the Panel provides specific scrutiny and advice on our safety performance. Opportunities to further strengthen this scrutiny are currently under review and the results of that review will be brought to the Board this summer.
- 5.2 Our dedicated Safety Executive Committee (Safety ExCo) meeting, co-chaired by the Commissioner and the Chief SHE Officer, meets every eight weeks to review strategic trends in both lagging and leading indicators and to discuss specific

safety topics and projects. This forum also provides pan-TfL safety assurance for changes affecting more than one TfL business area.

- 5.3 Under the overarching structure, each Chief Officer has their own regular SHE meeting as well as scrutinising safety in their performance meetings. Each operational mode has their own Safety Change Assurance process governing proposed changes that affect them specifically and are relevant to their operational duties.
- 5.4 It is crucial that we have good oversight of all safety operational decision-making meetings, to ensure that actions are adequately and effectively closed. We have centralised a list of relevant meetings, secretariats and reviewed the Terms of Reference (ToR) against our SHEMS requirements. This confirmed opportunities to improve consistency and embed good practices. All Directors responsible for these identified meetings have been made aware of the requirement for consistent ToRs and have committed to progress to completion any of the outstanding safety related actions.
- 5.5 TfL's centralised SHE Action Tracker has been made accessible to all areas of the business, providing a consistent, easy to use tool for logging, tracking and escalating relevant actions. This will enable continuing oversight of actions raised in the meetings identified above, including automated reminders to action owners, and visibility of actions that are overdue, to allow accountable Directors to ensure that they are being closed out.
- 5.6 We have also begun a review of the status and maturity of our technical governance and technical engineering accountabilities relative to best practice principles and examples in similar organisations. The findings of this review will inform immediate and longer-term actions to address the findings.
- 5.7 Whenever a serious incident or high potential near-miss occurs, Directors are required to trigger a Local Investigation, or in the most serious instances an internal Formal Investigation. All Formal Investigations are led by trained investigators supported by the SHE team. Lessons-learned summaries of our Formal Investigations have been routinely created since 2021 and circulated widely within the organisation. Action delivery is actively tracked and reported to the Safety ExCo. Following a review of our Formal Investigation process, we are introducing further steps in 2024 to improve the rigor of the lessons-learned process and application and assurance of action completion. We are also increasing the resources available for investigations to enable us to initiate and complete them more rapidly.
- 5.8 We have taken steps to increase visibility of Local Investigation Reports (LIR), requiring that they be circulated across relevant teams regardless of modes, and actions arising from those investigations are tracked via the centralised Action Tracker (see above). Our SHEMS has also been updated to provide clear, consistent guidance on the LIR process. Specific guidance on how to manage LIR recommendations, reports and lessons learned has been produced and an updated report template provided to make the process as simple and consistent as possible.

6 Concessionaire Management

- 6.1 We recognise that, to provide a safe working environment for our customers, colleagues and members of the public, we must work closely with the organisations who provide services on our behalf, holding our suppliers to the same consistent high standard as ourselves and learning from good practice in the industry.
- 6.2 Prior to letting any concession or contract, we carry out a detailed assessment of the suppliers' safety history, experience, competence and approach. Since 2022, we have been working to establish a more standardised set of contract requirements for SHE performance, assisting in clarifying accountabilities between us and our contractors. Over time, the approach reduces complexity as requirements become increasingly consistent between contracts. We are piloting this approach with contractors in the construction and projects domain, with new requirements launched in October 2023.
- 6.3 Once in contract, we carry out regular SHE assurance of our operations and contracted services. We hold regular safety discussions with concession operators to review safety performance data, encourage them to raise safety issues or concerns and discuss emerging risks, investigation reports, safety alerts, briefings and bulletins from across TfL. Members of our Executive Committee also meet their counterparts in suppliers teams where necessary.
- 6.4 Contract requirements include SHE performance. In November 2023, we committed to develop a standardised framework for specifying concessionaire SHE performance in future contracts and to benchmark current concessionaires against the framework. Since then, we have carried out a full review of performance management arrangements.
- 6.5 Each of our concessions are managed under a bespoke contract and management of safety differs due to complexities that arise as a result of the regulatory framework the systems operate under. Whilst it is therefore not possible to specify an entirely standardised safety framework, there are common practices that we follow to ensure that the performance of safety is managed appropriately.
- 6.6 During any re-franchising process, all bidders are required to meet a minimum safety threshold or their bid will be rejected. Once a contract goes live, there are additional obligations on the operator to meet safety requirements during the contract term e.g. having a safety management system in place, undertaking regular safety audits (TfL will have the right to carry these out), compliance with the Fleet Operator Recognition Scheme (FORS) for road vehicles and reporting safety metrics as specified by TfL (that will appear on the TfL scorecard).
- 6.7 The Safety Performance Index (SPI) is a measurement across all the concessionaires and is regularly jointly reviewed by the respective management teams with appropriate attention given to any negative trends. Moving forward, concessions will be required to report against specific safety metrics which will appear on the TfL scorecard (see above). The SPI will be used as a benchmarking indicator and our Rail and Sponsored Services team will carry out benchmarking comparisons within their portfolio each period. Currently this does

not include the Elizabeth Line performance so there is scope to include their performance in wider TfL Operations meetings alongside LU performance.

7 Safety Culture

- 7.1 Tools and procedures will not be effective if people do not want, or do not feel empowered, to use them effectively. As well as the simplification and digitisation described above, core to improvements in safety performance will be the safety culture of the organisation as articulated and demonstrated by leaders and as evident in the behaviour of our people and suppliers.
- 7.2 All Directors in operational or project areas are required to have risk informed SHE Improvement Plans. We have worked to standardise the template of these Improvement Plans and align them to our SHE priorities.
- 7.3 Within these SHE Improvement Plans, Directors are asked to include plans to assess the maturity of the safety culture in their area using TfL's SHE Cultural Maturity Model (CMM). Developed in 2021/22, the CMM allows us to measure, understand and improve SHE cultural maturity. This is part of a wider SHE Culture programme that includes a focus on SHE leadership, building a just and fair culture and becoming a learning organisation, where colleagues are encouraged and enabled to raise concerns and suggest improvements. This programme and progress date is described in more detail in a separate paper on the agenda for this meeting.
- 7.4 Creating a just and fair working environment at TfL is fundamental to building a positive and proactive SHE Culture, increasing our opportunities to learn as an organisation and drive improvements in our SHE performance. Just and fair describes a culture built on psychological safety, where individuals feel able to speak up without fear of being unfairly blamed when things go wrong. We have embedded these principles into our incident investigation guidance and created a just and fair digital decision support tool which is now accessible via our SHEMS. We are also taking steps to ensure that these principles are embedded into our wider HR Policies.
- 7.5 We subscribe to the Confidential Incident Reporting Analysis Service (CIRAS) and ensure the service is available and promoted both to directly employed staff and to London bus operator employees. CIRAS is independently run and allows our people to raise safety (or other) concerns anonymously and we are reviewing how we can further promote the tool and meaningfully utilise the data collected.
- 7.6 Internally, we are developing a pan-TfL colleague safety reporting system to enable our people to speak up about SHE issues and feel heard without fear of reprisal. Additionally, we have full structure of consultation and meaningful engagement with our recognised Trade Union colleagues in a range of Health and Safety forums allowing issues to be raised and addressed collectively.
- 7.7 Since 2021, we have been implementing the development of a digital assurance tool and digital checklists to cover the most common safety inspections and checks. This makes it easier to complete assurance checks, report faults and provide oversight that necessary checks are taking place. These digital tools have been mandated for use among our operations teams from the start of this financial year.

8 Precursors and near-misses

- 8.1 Pre-cursors, or leading indicators, tell us more about the confidence we have in our controls and activity to prevent harm so as to work in a more proactive and preventative way, focussing on activities that will prevent harm before it happens.
- 8.2 We capture information about incidents involving our services safety incident reporting systems. This provides us with a growing evidence base from which we identify strategic trends, underlying causal factors and high-risk locations to develop strategic and local improvement plans. We are working to bring all safety data into a single system and improve the flow of information from our contracted service providers. This will enable greater insight and give us a stronger view of precursors and leading indicators.
- 8.3 Fundamental to improving the flow of information and data capture is simplifying and making clear the definitions we use, and we have done so for 'near-miss' and 'high potential incident' data across the business, to help encourage more reporting so we can better understand issues before they arise.
- 8.4 We have also developed a leading indicator framework to enable meaningful conversations around safety performance, for example rates of completion of safety inspections and close out of actions/issues identified. We have reviewed all the indicators available to identify what, where and why they will be reported as well as comparisons to other organisations (transport and other sectors) to see how they use leading indicators. A programme of improving indicators for wider reporting and continually improving the evidence base for trend analysis will be progressed this financial year.

9 Asset design and maintenance

- 9.1 TfL has a wide and complex asset base with maintenance approached in a variety of ways to best operate and maintain them, dependant on the business model.
- 9.2 TfL's assets in rail, street, office, bus and river are primarily maintained via tendered contractual agreements. These are all managed via service levels agreed at tender. With operational teams monitoring progress and concerns on a periodic basis, if service levels (SLAs) drop – improvement plans and contractual clauses are enacted to resolve and escalate concerns. Urgent and safety faults are prioritised with make safe activity in most cases happening within hours of reporting or inspection. Permanent repairs then follow within the SLA.
- 9.3 TfL faults reported to internal maintenance teams primarily in the Underground area are prioritised by safety and risk also. Safety faults are graded and followed up until completion if noted as a safety concern.
- 9.4 Customer faults being received via TfL apps such as Streetcare or the TfL Contact Centre also follow the above process and the internal safety risk assessment.
- 9.5 We have reviewed the various business processes for reporting and managing asset safety concerns and faults across the operational asset areas. This has involved discussions with the London Underground Asset Control Centre and the

Network Management Control Centre Asset Response Desk to fully clarify their roles. A process map identifying the different ways a report can be made, and where the report gets routed, has been produced. This has identified opportunities to simplify the process, remove barriers to reporting and improve the tracking of action closure.

- 9.6 As described above, London Underground already has a robust QRA model used to assess risks from major hazards. This is based on a number of assumptions, of which asset condition is one. Engaging with QRA experts and groups governing our Assets, we have tightened the connection between decisions affecting assets and information provided to update SHE risk modelling and profiling.

10 Moving forwards – progressive roadmap

- 10.1 Since the formation of the new SHE Directorate in 2020, we have been on a journey to review and strengthen our pan-TfL strategic safety risk management. The key focus of this has been ensuring we have the firm foundations in place to empower our people to manage risk out of our operations as far as reasonably practicable. Focussing on getting the basic processes, tools, skills and supporting materials as refined and effective as possible means we will be in a position to lead, innovate and change as safely and efficiently as possible moving forwards.
- 10.2 None of the improvements outlined in this paper are standalone items, they all connect and support each other and together, with our wider SHE strategies/roadmaps, we are confident that we will achieve, maintain and continue to improve our robust safety risk management culture.

List of appendices to this report:

None

List of Background Papers:

[Report on Safety Risk Management on TfL Services: to the Safety, Sustainability and Human Resources Panel on 15 November 2023](#)

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