

Date: 10 December 2024

Item: Enterprise Risk Update – Failure to Prevent Safety Incidents or Meet Safety Commitments (Places-L0-01)

This paper will be considered in public

1 Summary

- 1.1 This paper provides an overview of Places for London Limited's Level 0 Enterprise Risk 01 - 'Failure to prevent safety incidents or meet safety commitments' (Places-L0-01).
- 1.2 The risk is defined as 'failure to prevent a major safety incident, comply with safety law or systemic failure to meet safety commitments and targets as laid out in the Mayor's Transport Strategy, TfL's Vision and Values roadmaps or Places for London's corporate strategy.'
- 1.3 Significant work has taken place over the last 12 months which has moved the current assessment of this Enterprise Risk from 'High' to 'Medium' and from 'Requires Improvement' to 'Adequately Controlled'. This paper, together with the paper included within Part 2 of the agenda identifies further actions with the aim of reducing the risk assessment to 'Low' in 12 months' time.
- 1.4 A paper is included on Part 2 of the agenda which contains exempt supplementary information. The information is exempt by virtue of paragraph 3 of Schedule 12A of the Local Government Act 1972 in that it contains information relating to the business affairs of TfL. Any discussion of that exempt information must take place after the press and public have been excluded from this meeting.

2 Recommendation

- 2.1 **The Committee is asked to note the paper and the exempt supplementary information on Part 2 of the agenda.**

3 Background

- 3.1 This Enterprise Risk relates to the potential impacts arising from a failure to prevent a major safety incident or meet safety commitments by Places for London. These could include a fatality, major injury or reduced mortality of a colleague, contractor, tenant or customer, regulatory action, prosecution and fines, and also result in additional unplanned spend to achieve homes targets or fund increased maintenance. A major safety incident in a Places for London property close to the transport network could also result in a failure or disruption in service delivery.

- 3.2 A major safety incident could also negatively impact public, Mayoral, stakeholder market and investor perception of Places for London's risk management capability and lead to lenders taking a more risk averse approach or potential partners not wanting to participate in Places for London projects. It could also make Places for London a less attractive proposition to existing and potential employees.
- 3.3 Previously, the risk level was assessed as 'High' with a target assessment of 'Medium' within 12 months. The 'Overall Control Effectiveness Rating' of this risk was assessed as 'Requires Improvement'. Working closely with TfL's Safety, Health and Environment (SHE) team, we have developed and embedded further key controls and completed actions to mitigate this risk.
- 3.4 The current risk level is now assessed as 'Medium' with a target assessment within the next 12 months of 'Low'. The 'Overall Control Effectiveness Rating' is now assessed as 'Adequately Controlled'. Specific actions taken over the last 12 months include embedding the team of SHE Business Partners, dedicated to Places for London, into our business, the completion of our programme of asset condition surveys and the establishment of annual SHE improvement plans.
- 3.5 We have continued to build our assurance framework, through for example our Safety, Health and Compliance Advisory Group. This Group provides a forum for in-depth discussion and peer review on matters of safety, health and property compliance. It performs deep-dives on safety, health and compliance related topics and reviews the effectiveness of improvement actions taken.
- 3.6 Last year we also undertook an assessment of our SHE culture, which indicated that our culture was 'Structured'. Measures taken to improve on this include the development of our Safety, Health and Wellbeing Strategy which is based around three pillars, Health and Wellbeing, Beyond Bricks and Mortar and Learning and Collaborating. That was launched at our successful Safety, Health and Wellbeing Stand Down Day in April. We have also increased the number of SHE Leadership Engagement Tours we undertake and extended the group that undertakes these to include the wider senior leadership team. We undertook a review to pinpoint any skills gaps and identified several areas where further training was required. This is now being delivered.
- 3.7 We have also increased our use of data and systems, including TfL's Information Exchange system to record and manage incidents, and iAuditor (now called SafetyCulture) to record the findings of planned general inspections across our estate. We have introduced a safety and compliance scorecard which enables us to better understand our risk profile and inform our investment planning and decision-making. We have also begun to share best practice and benchmark our performance against that of other organisations.

4 Controls and Mitigations

- 4.1 The controls to manage this risk, consisting of 14 preventative controls and six corrective controls are detailed in the related paper on Part 2 of the agenda together with a list of actions, that will ensure that the controls are effective in both design and operation and meet the 'Target Assessment' of 'Low' within 12 months. All actions have been assigned an owner and we are targeting their completion within the next 12 months.
- 4.2 The three key mitigations for this risk actions include development of a tailored version of the SHE Management System, for Places for London, developing a long-term approach to how we manage and maintain our assets and continuing to enhance our assurance activities. Alongside embedding the TfL Colleague Safety Plan together, these measures will enable us to better protect people and assets, gain better insights, and make more informed decisions. Progress against these actions will be reviewed and reported to the Committee in 12 months' time. Places for London leadership will review progress periodically.
- 4.3 The following actions are considered to be the key mitigations which will move the assessment of the risk from Medium to Low within 12 months:
- (a) SHE Management System – we currently operate under TfL's SHE Management System. We will build on this to create a tailored version more appropriate for a property business rather than a transport authority. This will include a framework for technical assurance for all projects across our estate which is being produced in conjunction with TfL Engineering. Another key focus will be on embedding the recently published TfL Colleague Safety Plan, including at our next Safety Stand Down day in January where the theme will be on personal safety;
 - (b) Long-term approach – we have recently completed a procurement for a new computer-aided facility management system. This is an important milestone in the journey towards taking a more long-term approach to the way in which we manage and maintain our assets. The system will enable us to use the insights gained from the recently completed asset condition surveys to develop a five-year planned maintenance programme, targeting investment where it is most needed, and to establish performance metrics that will enable direct comparison with companies in our sector. We will continue to work with the TfL SHE team, to identify further ways of gaining better insights to inform our decision making; and
 - (c) Assurance, monitoring and benefits realisation – we are using insight to drive action, alongside training for all Places for London colleagues. This includes assurance frameworks, health and safety tours and leading indicators to monitor compliance, infrastructure performance, project benefits realisation and the efficacy of the SHE Management System and activities. Assurance also extends to the activities of third parties on our estate. We have an extensive programme of monitoring tenant compliance, that has reduced our exposure to risk. We will continue to build on this alongside assurance of our suppliers and partners. Working with the SHE team, we will rerun the SHE Culture Assessment during 2025/26 to measure improvements. We will also extend the role of the Safety, Health and Compliance Advisory Group to include evaluation and peer review of

significant proposed changes to organisation or management arrangements for Places for London to consider their impact on safety, health and compliance management.

List of appendices to this report:

A paper containing exempt supplementary information is included on Part 2 of the agenda.

List of Background Papers:

None

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