



This is the policy of Railway Drainage Limited (RDL) for 2017-18. It is subject to review at least annually to ensure that it remains appropriate to the business' purpose, the context within which we and all interested parties operate and continues to support our scope of work:

The provision of rail and non-rail project management, including drainage works, minor track works, supply and operation of plant in possessions on Network Rail controlled infrastructure and private sites.

We ensure a continued understanding of policy throughout the company by initial induction, ongoing briefing and discussion at all levels. The policy is available on company noticeboards and on our website ensuring its availability to relevant interested parties including Network Rail, client and supplier organisations, enforcement agencies, employees, visitors & neighbours.

Safety, Health, Environment & Quality (SHEQ) Management

Our SHEQ policy ensures continued compliance with all legal and regulatory requirements including ISO9001(2015), ISO4500(2015) & ISO14001(2015) standards and those of our interested parties.

Business objectives are set and implementation measured against key performance indicators to support our policies and business plan, to ensure continual improvement of our processes, people and performance. Responsibility and accountability are disseminated through job descriptions and supplemented with personal objectives, set, measured and reviewed by line managers. Monitoring of the effectiveness of key areas of policy and process are measured on a risk basis by line managers and through internal and external audit. The executive take responsibility for the effective implementation of corrective action.

The executive will disseminate a behaviour based leadership role by example of a positive attitude and good communication towards safety, health, environment & quality issues and the protection of the environment and a sustainable future.

Operational and business risk is managed through assessment and control to identify potential improvement to policy, process and behaviour.

Injury and ill health is prevented through the assessment and control of risk by providing appropriate resources including work environment, welfare facilities, equipment, supervision, information, training and time. Instances of accident, operational incident and close call will be reviewed through our fair culture process to identify potential improvement to policy, process and behaviour.

Protection of the environment is assured through the assessment of aspects and control of impacts to prevent pollution and maximise the efficiency of the use of natural resources and maintain sustainability.

Safety, health, environmental and quality behaviour will be measured though executive tours, management site visits, informal discussion and formal site checks.



Health, Fitness & Wellbeing

RDL is committed to providing a working environment which promotes and maintains the health, fitness and wellbeing of its staff. Individuals are our most valued resource and their health, fitness and wellbeing is essential to effective work performance. RDL shall positively encourage individuals to participate in behaviour that promotes physical and mental wellbeing. This will be achieved through:

- Encouraging confidential disclosure of individual's health when starting with the company to identify appropriate opportunities to promote a holistic approach to health, fitness & wellbeing improvement.
- Tailoring a health surveillance programme for individuals to promote the maintenance and improvement of levels of health, fitness & wellbeing.
- Making appropriate external expertise available to individuals for advice.
- Liaising with individuals to design work patterns to support a healthy work/life balance whilst meeting the requirements of the business.
- Supporting individuals to take responsibility for their own health, fitness and wellbeing by providing appropriate resources and initiatives.

Worksafe

The executive and management team support individuals to work safely throughout the company and recognise their legal duty under the Health & Safety at Work Etc. Act 1974 and moral obligation.

Individuals are encourage to remain vigilant for opportunities to improve safety through raising close-calls. Where there is an immediate threat to themselves or others, individuals must challenge the planned system of work and if necessary prevent commencement or suspend works until risk has been reasonably controlled.

The company operates a fair culture policy which ensures that individuals implementing our workplace process are supported when needing to challenge a planned system of work or the status quo. The Safety Director will oversee that individuals are worked with professionally and courteously to resolve a perceived issue without fear of blame or reprisal.

Worksafe interventions will be discussed at management meetings (including management review) in order to consider change to policy, process and behaviour.

Sustainability

The company shall adopt a policy of material, product and personnel procurement that ensures a sustainable operating future in the areas of workplace, marketplace and community. Our goal is:

"Meeting the needs of the present, without compromising the ability of future generations to meet their own needs"

RDL plans to safeguard a sustainable future for itself and our interested parties.

Our marketplace will be safeguarded through:

- Liaising with interested parties and adapting to their requirements where practicable.
- Agreeing sustainability goals with clients for the duration of works together.
- Encouraging the adoption a common sustainability approach throughout the supply chain reflecting current best practice.
- Identify, measure and monitor key performance indicators to provide guidance to improvement initiatives.
- Support the supply chain to reach a minimum acceptable level of sustainability.

Our workplace will be safeguarded through:

- Including a sustainability objective in individual's performance reviews where applicable.
- Inclusion of sustainable outcomes from our environmental impact register.
- Progressively raising the expected outcome of our health, fitness and wellbeing policy.
- Ongoing review of the impact of business processes on our sustainability (premises, vehicles, plant, personnel, materials supply, task methodology etc).
- Ongoing review of the impact of company vehicle choices on sustainability.
- Provide employee social opportunities that will encourage fitness and a healthy lifestyle.

Our community (interested parties) will be safeguarded through:

- Identifying the greater communities of our interested parties and ensuring the integration of their ideals in to our own.
- Maximise resourcing from within the community to greater mutual benefit.
- Remaining open to expanding our community.
- Involvement in community initiatives and triggering new ones.

Equal Opportunities

No employee or outside party will be discriminated against either directly or indirectly on unlawful grounds by any member of RDL. Any challenge to this principal will be managed through the company disciplinary process directly by the executive and referred to the appropriate enforcement agency where necessary.

It is a mandatory requirement that RDL's personnel agency supply chain adopt the same stringent approach in order to qualify for and remain an approved supplier.

RDL will maintain a neutral working environment in which no worker feels under threat or intimidated.

This policy will be assured through:

- Sourcing recruiters from appropriate professional sources with anti-discrimination policy in line with that of RDL.
- Train internal recruiters in anti-discrimination skills.

- Including at least one independent individual in the interview process outside the management line.
- Including a diverse and multi-cultural panel approach to the selection process.
- Building a culture of promotion and advancement on merit.
- Review of all company documentation against the values of this policy to ensure no inadvertent discrimination.
- Maintain accurate pre-interview selection, interview and employee company records so as to ensure transparency of process for review by an independent arbiter.
- As the company becomes sufficient in size to generate meaningful statistical information, provide access to records to an independent confidential body to monitor company diversity.

Modern Day Slavery

RDL maintain arrangements to prevent offences under the Modern Day Slavery Act (MDSA) 2015. We recognise that slavery and human trafficking remain a threat to individuals and business alike. Though not required to make a formal disclosure of activities under the MDSA, the executive wish to provide the following slavery and human trafficking statement in accordance with Section 54 of the MDSA:

- The executive ensure senior managers monitor the company recruitment and contracting process to ensure their integrity.
- The executive shall ensure relevant staff are provided with sufficient knowledge to be able to recognise the signs of slavery & trafficking abuse.
- The executive and senior managers are open to anyone who wishes to discuss any suspected slavery and trafficking abuse, suspected abuse will be reported to the police.
- All employees have been empowered to report any suspected slavery & trafficking abuse.
- Individuals joining the company are required to embrace this policy.
- Staff supervising agency staff specifically remaining alert for the signs of coercion.
- Supplier approval and maintenance requires acceptance of this policy and complete transparency in the maintenance of its values down the supply chain.
- The company will consider involvement in initiatives to accelerate MDSA improvement to the industry.

Bribery & Corruption

The company executive strictly implement policy to ensure that bribery and corruption do not take place within the business. Any transaction at risk of abuse is closely monitored by the executive and any suspicion will be investigated in line with the company's fair culture. The CEO will preside over any such incidents which may include:

- Dealing with a government intermediary.
- Political donations.
- Money laundering.
- Relationships with third parties.
- Falsification of the company books and records.
- Charitable contributions.
- Travel and hospitality.
- Gifts and entertainment.
- Conflicts of interest.



- Bribery of government officials.
- Commercial bribery.
- Whistle blowing mechanism (safe work).
- Facilitation payments.

Smoking & Vaping

Employees and other interested parties will be protected from breathing tobacco smoke and e-cigarette vapour.

The harmful effect of tobacco smoke is well publicised. Whilst it is recognised that there is no current vaping legislation, it remains unlicensed and little is known about its health risks.

The company respects an individuals' wish to smoke or vape as an aid to reducing or quitting smoking and do not discourage its use in this respect.

Smoking and vaping is not allowed in any RDL building or vehicle. We expect people who are smokers or vapers to take all steps to prevent their smoke or vapour affecting others whilst at work or visiting RDL regardless of location.

A smoking and vaping location is provided to the rear of the Maisemore office. Smokers and vapers must segregate themselves to prevent inhalation of unwanted smoke or vapour.

RDL will not tolerate any contravention of this policy and will take disciplinary action in the event of any infringement of its policy. This may lead to sanctions or dismissal.

Drugs & Alcohol

RDL will maintain arrangements to prevent, drug or alcohol offences under the Transport and Works Act 1992, The Railways and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS) and to maintain compliance with NR/L1/OHS/051 Network Rail's Drugs and Alcohol Policy, RIS-8070-TQM Testing Railway Safety Critical Workers for Drugs and Alcohol and GE/GN8570 Guidance on the Management of Drugs and Alcohol.

Employees, visitors and subcontractors:

- Shall not come to work in an unfit state through Drugs or Alcohol.
- Shall not consume alcohol whilst at work.
- Shall not use, possess or supply any drug whilst at work or on Network Rail premises.
- Shall be aware that the consumption of alcohol, even in small quantities, and the consumption or use of any drugs may adversely affect their safety, performance, conduct or efficiency as well as the safety and wellbeing of others.
- Shall not discontinue an agreed course of treatment for a drug or alcohol related problem without good reason.
- Shall when requiring medication, find out if there may be side effects likely to impair their work performance and safety from the drug or other medication concerned, whether prescribed or available without prescription. Where this is the case, they shall seek advice regarding alternatives and advise their manager/supervisor when reporting for work.
- Shall tell their manager/supervisor if they believe they have or may have a drug or alcohol related problem.
- Shall undergo drug & alcohol testing when requested to do so.

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Pre-employment, promotional, unannounced, for cause and management discretionary drug and alcohol testing is undertaken in accordance with RDL procedure SSM028 Drugs & Alcohol. A minimum of 10% of employees will undergo an unannounced D&A screen per annum. Employees and those holding (or planning to) a track visitor permit will undergo drug and alcohol testing when requested to do so by an authorised individual.

RDL will not tolerate any contravention of this policy and will take disciplinary action in the event of any infringement of its policy or refusal to be D&A screened. This may lead to sanctions or dismissal. Individuals proactively declaring a drug or alcohol problem ahead of any issue will be supported to obtain necessary professional help without sanction.

Fatigue Management

RDL recognises the responsibility to manage the risk of fatigue under the following legislation and standards:

- The Health & Safety at Work Etc Act 1974
- The Road Traffic Act 1999
- The Management of Health & Safety at Work Regulations 1999
- The Working Time Regulations 1998
- The Railways and Other Guided Transport Systems (Safety) Regulations 2006
- NR/L2/ERG/003 Management of Fatigue: Control of working hours for staff undertaking safety critical work
- NR/L3/MTC/MG0224 Infrastructure Maintenance Process for the Management of Fatigue & Working Hours for Employees Undertaking Safety Critical Work
- NR/L3/NDS/006 NDS Process for the Management of Fatigue and Working Hours for Employees Undertaking Safety Critical Work
- RS504 Fatigue Management – A Good Practice Guide

RDL manages its activities through a behavioural based safety approach stemming from strong leadership, encouragement, involvement and ownership. The company acknowledges the increased risk to our employees and other interested parties by safety critical workers and others affected by fatigue.

The arrangements in place to implement this policy are contained in the RDL Systems Support Manual section 27, Fatigue Management and include:

- The proactive planning of work shifts so as to reduce fatigue.
- The allocation of personnel based on a priority of geographic suitability (shortest distance to travel).
- The management of travel and accommodation to maximise rest and minimise travel both before and after a work shift.
- Emergency arrangements for the assessment and support of personnel on site should their planned work or travel hours increase.
- The monitoring of hours rested, travelled and worked.
- Occupational health monitoring of individuals.

Signed



Date

11th April 2018

Keith Moore, Managing Director



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