

This is the Company Policy Statement of Railway Drainage Limited (RDL) for 2019-20 which supports our prime policies covering:

- Health, Safety, Fitness & Wellbeing
- Environment
- Quality

The Company Policy Statement provides additional policy in the areas of:

- Sustainability
- Anti-slavery and Human Trafficking
- Smoking & Vaping
- Fatigue Management
- Equality & Anti-discrimination
- Bribery, Corruption & Fraud
- Drugs & Alcohol
- Fair Culture

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.

This policy ensures continued compliance with associated legal and regulatory requirements and those of interested parties.

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct. RDL unconditionally reserves the right to terminate a relationship with other individuals or organisations in the supply chain if they are found to be in breach of RDL policy.

Signed



Date

12th April 2019

Keith Moore, Managing Director



Railway Drainage Limited is registered in England & Wales, number 4424915. Registered office: Railway Drainage Limited, The Steadings, Maisemore Court, Maisemore, Gloucestershire GL2 8EY

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RDL shall manage its business to maximise sustainable efficiency in our workplace, the marketplace and wider community. Our goal is: *“Meeting the needs of the present, without compromising the ability of future generations to meet their own needs”*.

RDL recognises Network Rail’s environment and social performance policy incorporating environment, energy & carbon, weather resilience & climate change adaption and social performance policies. Company’s size will reflect the pace and level of our sustainability initiatives. RDL shall observe the principles of these four policies whilst working towards full compliance.

A sustainability planning and management process is being developed to standardise activities across projects. This provides guidance and a scoring system against which the company can measure progress against sustainability targets. This process shall ensure the consideration of all available initiatives and the implementation of the most suitable and effective for our workplaces, marketplace and community needs. Progress against targets will be monitored through the existing management review process.

When planning works we will maximise the use of local personnel, materials and equipment to benefit the local marketplace and economy and provide a “green travel plan” to minimise project costs and carbon.

RDL will maximise the use of existing interfaces and initiatives with the local community where applicable by liaising with:

- The Network Rail IP Environment Manager/Route Environment Specialist.
- The Wildlife Trust.
- The Canal & River Trust.
- Local authority Environment & Sustainable Development departments.
- Community environmental groups.
- Local colleges and schools (benefitting students by supporting the curriculum).

During works we will minimise detrimental impact on the local surroundings by leaving a lasting legacy through improving habitat and biodiversity, e.g. providing green areas, ponds, paths, rainwater harvesting, growing areas, composting and recycled materials.

RDL aim to cultivate a sense of ongoing community through providing the opportunity for local involvement to further develop and maintain community areas.

For further information on company sustainability initiatives please contact the Safety Director.



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No employee or outside party will be discriminated against either directly or indirectly on unlawful grounds (race, religious belief, sex, age, disability, sexual orientation, gender reassignment, marriage/civil partnership, pregnancy or maternity/paternity) by any member of RDL. This policy is provided to all employees, contractors and agencies responsible for recruitment. Any challenge to this policy or its principals will be managed through the company disciplinary process directly by the executive and referred to the appropriate enforcement agency where necessary. The Managing Director has overall responsibility for ensuring that this policy is implemented in accordance with statutory requirements, codes of practice and available guidance. Employment advice is provided by Citation.

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

It is a requirement of RDL's supplier approval process that contingent labour suppliers and consultancies adopt the same stringent approach to equality and anti-discrimination in order to qualify as and remain an approved supplier.

Those responsible for resourcing contingent labour and contractors will be skilled in equality and anti-discrimination to maximise the available diversity of personnel.

During recruitment independence and diversity of selection, shortlisting and interview will be ensured through the inclusion of a witness from outside the management line or the company.

Recruitment from within the company will be on equal standing as external recruitment, applicants being considered solely on their suitability to the position in to build a culture of promotion and advancement on merit.

Training will be identified through training needs analysis at performance reviews and by role requirement. Training will be equally available to all personnel with a requirement.

RDL shall collect and monitor information associated with implementing its equality and anti-discrimination policy in accordance with the requirements of the General Data Protection Regulations as described in GDPR01 Privacy Notice – Information for staff.

The results of monitoring will be included in the existing management review process at which time consideration will be given to amending this policy to afford greater equality of opportunity.

As the company becomes sufficient in size to generate meaningful statistical information, the company will provide access to records to an independent confidential body to monitor company equality and diversity.



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This policy follows that of Network Rail and applies to the directors of the company, employees, contractors and suppliers.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. Through threats, violence or coercion, victims of modern slavery are forced to work for little or no money, live in squalid accommodation and may have their identity documents taken away from them.

RDL shall:

- Do all that we reasonably can to prevent all forms of modern slavery.
- Act ethically and with integrity in all our business dealings and relationships.
- Implement and enforce effective systems and controls.

This will be achieved through:

- Transparency of process in our own business.
- Requiring supply chains to adopt RDL anti-slavery and human trafficking policy or provide policy of equal worth under the Modern Slavery Act 2015.
- Vigilance in recognising the symptoms that something may be wrong with contractor's or contingent labour arrangements, e.g.
 - (a) No written contracts of employment.
 - (b) They have had to pay fees to obtain work.
 - (c) They are not able to prove they are legally entitled to work in the UK.
 - (d) Large number of people listed as living at the same address.
 - (e) Agencies charging suspiciously low rates.

The executive has overall responsibility for ensuring this policy continues to comply with legal and ethical obligations, and that it is complied with.

The Safety Director has is responsible for ensuring effectiveness of this policy including monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

The Resources Manager has primary responsibility for implementing this policy by resourcing through ethical sources of supply.

All managers are responsible for ensuring those reporting to them understand and comply with this policy. Those employees working in areas deemed to be of 'high risk' will be given adequate briefing on this policy and the issue of modern slavery in supply chains.

Responsibility for detection and reporting of modern slavery in any part of RDL or our supply chain is the responsibility of all those who work for RDL. You have a responsibility to raise concerns about any issue or suspicion of modern slavery in any part of the business or supply chain of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager as soon as possible.

TITLE
Company Policy Statement
Anti-slavery & Human Trafficking (modern slavery)



RDL will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The executive is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that any form of modern slavery is or may be taking place in any part of RDL or in our supply chain.



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This policy follows that of Network Rail and applies to the executive of the company, employees, contractors and suppliers.

Bribery is the practise of offering or receiving an incentive, in order to gain a reward or an advantage which can lead to corruption and fraud. RDL recognise that bribery can take place maliciously for personal gain or out of ignorance. RDL shall ensure neither of these are possible through:

- Maintaining a legal and ethical bribery, corruption & fraud policy.
- Briefing employees and the supply chain in the company bribery, corruption & fraud policy.
- Educating employees in legal and ethical business practice.
- Monitoring project processes.
- Recognising every employee's right to report wrong doing.
- Investigation all suspicion of bribery, corruption or fraud in line with the company fair culture policy.

Under the UK Bribery Act 2010 it is illegal to:

- Offer a bribe.
- Accept a bribe.
- Request a bribe.
- Bribe a foreign public official in order to obtain or retain a business advantage.
- Fail to prevent bribery in a commercial organisation. That is, failing to have adequate procedures in place to prevent anyone associated with a company committing offences against the UK Bribery Act, specifically:
 - Dealing with a government intermediary.
 - Political donations.
 - Money laundering.
 - Relationships with third parties.
 - Bribery of government officials.
 - Commercial bribery.
 - Falsification of the company books and records.
 - Charitable contributions.
 - Travel and hospitality.
 - Gifts and entertainment.
 - Conflicts of interest.
 - Whistle blowing mechanism (safe work).
 - Facilitation payments.

No individual in RDL or its supply chain shall offer, make, ask for, or accept a payment, gift or favour in return for favourable treatment or to gain a business advantage. RDL does not tolerate any form of bribery. Suppliers in breach of this policy will be removed from the RDL supply chain. Employees in breach of this policy may have their employment terminated. Individuals suspected of breaking the law will be reported to the appropriate authority.



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The company does not condone smoking or vaping. This policy is provided to ensure employees and other interested parties remain 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 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. Where possible, similar arrangements will be made available on temporary sites.

The company encourages all smokers to stop smoking and will take all reasonable steps to encourage and support individuals in doing so. Individuals wishing to stop smoking should contact the Safety Director to discuss how the company can help.

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



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RDL maintains 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.

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.



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RDL is responsible for managing the risk that fatigue brings in accordance with:

- 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

The company acknowledges the increased risk to employees, contingent labour and other interested parties by individuals becoming affected by fatigue. Fatigue shall be managed through positive behavioural safety. Every individual in the company is responsible for preventing fatigue:

- a) The executive shall provide adequate financial resources for sufficient competent personnel, travel arrangements, rest, accommodation, meals, refreshment and welfare in order to prevent fatigue.
- b) Project managers shall ensure adequate resources are allocated and that works are managed in order to prevent fatigue.
- c) Competent planners must provide a suitable safe system of travel, rest, work and welfare arrangements to prevent fatigue.
- d) Resource managers must provide suitable competent personnel, travel arrangements, rest, accommodation, meals, refreshment and welfare to meet safe project requirements and prevent fatigue.
- e) Site managers and supervisors must ensure that safe planned arrangements continue to prevent fatigue. Where a change is required to the planned arrangements this must be reported, re-assessed and authorised prior to being adopted.
- f) Individuals must travel, rest, work and use accommodation and welfare as planned to prevent fatigue. Where fatigued this must be reported and alternative arrangement adopted.

The Safety Director shall investigate any deviation from this policy including exceedance of travel/working hours and insufficient rest.

Periodic occupational health monitoring shall be undertaken to ensure the effectiveness of this policy.

The arrangements in place to implement this policy are contained in RDL procedure 27, Fatigue Management.



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RDL has adopted the Network Rail Principles of a Fair Culture for managing the investigation and determination of accidents, incidents and close calls that may have been caused by an unsafe act.

This policy ensures that individuals are treated in a professional, consistent and fair manner throughout an investigation with the aim of identifying underlying causes and preventing recurrence.

The Safety Director shall lead any investigation using the following Network Rail processes:

- a) Principles of a Fair Culture December 2014
- b) A Guide to using the Fair Culture Flowchart version 1.1 July 2013
- c) Fair culture investigations frequently asked questions version 1.0 September 2013

The following principals shall be adopted:

Behaviours

- It is clear to everyone, through the Network Rail Lifesaving Rules, what behaviours are expected of them at work.
- RDL aims for a fair culture where we can have honest and open discussions about safety.
- Reporting shall be encouraged, valued and listened to.
- Anyone who reports a near miss, unsafe behaviour, unsafe condition or unsafe asset shall be able to do so in a blame-free environment and will be fully supported by their line manager, Safety Director and the executive.
- Failure to report an incident, near miss, unsafe behaviour, unsafe condition or unsafe asset by anyone in the company is unacceptable.

Consequences

- There must be consistent messages, processes and consequences to any breach of law, Lifesaving Rule or planned safe system of work.
- All potential breaches of law, Lifesaving Rule or planned safe system of work shall be independently investigated in a fair and transparent manner by the Safety Director.
- Where outcomes from an investigation require further action, this shall be a separate process between an individual and their line manager.
- No action will be taken against an individual without their recourse to a fair and transparent process.
- Any disciplinary action sanctioned by the company against an individual shall only be taken as a result of a thorough investigation and a hearing (and where necessary an appeal) with the right to independent observation.

This policy is provided to encourage the reporting of accidents, incidents and close calls and promote open and honest dialogue about health, safety and wellbeing issues and concerns.



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