

Occupational Health & Safety Annual Report Year ended 31 March 2019

SAFE at all times

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Executive Overview

Welsh Water is the sixth largest of the ten regulated water and sewerage companies in England and Wales. Responsible for providing over three million people with a continuous, high guality supply of drinking water and for taking away, treating and properly disposing of the wastewater that is produced; we are fully committed to delivering best quality service at least possible cost. We operate 66 impounding reservoirs and supply an average 828 million litres of water every day through a network of 26,500km of water mains. We also collect waste water (including surface water and highway drainage) through a network of 30,000km of sewers, which is treated at 838 wastewater treatment works located next to rivers and along the coast of Wales. We are operating, maintaining and upgrading these assets and their associated pumping stations on a daily basis. These essential public health and customer services (and the ancillary activities that support them) are delivered by over 6,000 people who work either for Welsh Water or for one of the Company's outsourced service partners.

Ensuring the health and safety of all our employees, contractors and members of the public is always a key priority and a big responsibility.

The financial year ended 31 March 2019 (2018-19) saw us continue to improve our health and safety management systems and processes. It was the fourth year of the regulatory period ('AMP6') and during this year we have further increased the amount of construction works being delivered as part of our 5 year capital investment programme. In 2009-10, only 220 people were directly employed by Welsh Water. Following 'in sourcing' in 2010 Welsh Water now has over 3,500 employees including our Water, Waste, Retail, Commercial and Support functions.

Where the nature of business activities has changed, or we have taken on additional responsibilities, we have assessed the health and safety impacts to ensure that the risks associated with these changes were effectively managed.

Safety performance In 2018-19 overall performance has continued to improve. There has been a significant reduction in the number of RIDDOR reportable injuries alongside an increased number of employees and contractor worked hours in the year. We have had a reduction in the rate of HSE RIDDOR reportable incidents (RIR) and we have had the lowest RIR and All Injury Rates for over 12 years. The Water business is approaching nearly 4 years without a RIDDOR reportable employee injury. All Lost Time Injuries (LTIs) have also reduced and they will continue to be subject to additional focus to ensure that we are preventing harm and managing absence effectively with appropriate health support in place for employees.

We have continued to encourage our employees and contractors to make 'Positive Interventions' and take action where there are unsafe acts or conditions observed. We place emphasis on these leading indicators as a precursor to a positive safety culture. There was a further increase in the number of near misses and positive interventions reported during the year.

There have been some significant incidents and near misses reported during the year, including a dangerous occurrence with a contractor excavator that overturned in the highway. All of these incidents were thoroughly investigated and process changes / additional controls implemented, as appropriate.

We will continue to encourage the reporting of significant incidents and will treat them seriously to ensure we are learning from them to effectively manage risks.

While our safety performance has continued to show improvements. we cannot be complacent. We will continue to ensure that we are making Positive Interventions to prevent injuries and that all employees and contractors are involved, as Safety Takes Every Person

Health and wellbeing performance

We work closely with our Occupational Health service provider to monitor and improve employee health and wellbeing. Working alongside Human Resources, this service enables managers to obtain information and advice to manage employee health and wellbeing and to support employees with long and short term health conditions.

The Human Resources and Health and Safety teams have also worked together during the year to support managers to further improve our attendance management and monitoring systems. Specifically introducing a new training course for managers. We have looked at our workforce demographics and identified future health challenges, including the needs of older workers as many employees now choose to continue working later in life.

Our latest programme of targeted occupational health surveillance for Welsh Water employees commenced in September 2018. This process enables us to effectively support employees and to identify and manage potential health risks before they result in ill health and sickness absence.

There has been a significant reduction in the total number of working days lost from injuries during 2018-19. While the majority of incidents have resulted in under 7 days off work, there has been a small number of employees and contractors who have been unable to work for an extended period of time. Health and wellbeing is an area we will continue to focus on with both our own employees and our contract partners.

We are also continuing to support external bodies such as HSE and IOSH to promote good health and wellbeing. We have increased our use of occupational health specialists, including working with an ergonomist to help review our management of manual handling tasks and DSE risks.

We will be working with a range of partners in the coming year to support managers and employees to remain 'Safe, Healthy and Happy' in their work. We will also continue to promote our annual 'Healthy Working Award' that was launched at our 2016 H&S conference.

Our proactive approach to managing Occupational Health and Safety

To maintain the focus on improving our occupational health and safety performance, we have continued to develop and deliver occupational health and safety strategies and report back to the Board Quality and Environment Committee (QEC) on progress. This provides a clear framework for how we will achieve our aspirations (our 'Journey to Zero') and aims to ensure that good occupational health and safety practice is embedded across the business. The last review of our health and safety performance was held with the Board in May 2018 and we were able to demonstrate good improvements against all the identified areas in our AMP6 strategy. We have a focus on 5 key themes: Leadership and Management, Health and Wellbeing, Risk Management, STEP and Culture and Contractor Management.

Specific activities during the last year have included:

ISO 45001 Training – To support our transition from OHSAS 18001 to ISO45001 in 2019, members of the Health and Safety, IMS and Business Assurance teams completed formal training in this new standard.

HSL H&S Climate Survey – An initial employee survey was carried out in 2017. This was repeated in February 2019 with 74% of all employees completing a survey. The responses show that the company is above the HSE averages and in most areas the scores have further improved since 2017. We will be using the survey findings to develop local and corporate action plans for 2019 onwards.

Communications and Awareness –

our 2018 annual employee engagement survey continued to show very high scores for health and safety. 97% of all our employees were clear what was expected of them with regard to health and safety and 94% believed that health and safety is taken seriously at Welsh Water. Delivery of our annual programme of monthly toolbox talks and regular health and safety days has kept the focus high and employees actively engaged in making improvements. During 2018 our programme included Mental Health, Manual Handling/ Back Care, Healthy Bodies and Winter Preparations/Slips, Trips, and Falls.

2018 Health and Safety Conference and Awards – this was attended by

over 300 employees and contractors and allowed them to showcase best practice and share new ideas. This event is the highlight of our annual health and safety awareness programme. The 2018 event focussed on 'Stepping Forward' and how everyone has a part to play in ensuring we all remain Safe, Healthy and Happy.

Working with our Partners – we

have continued to work closely with our contract partners during the year. During 2018 we held a series of contractor workshops where we reinforced our health and safety expectations and allowed companies to share their health and safety improvement plans and learn from each other. We have also established a programme of quarterly site manager forums for our capital partners bringing together the key influencers of health and safety on our construction sites.

Safety Takes Every Person – Our Health and Safety Culture Challenge

In previous annual health and safety reports we have highlighted that we believe that we experience too many avoidable injuries. We recognise the importance of human factors as contributors to incidents and have continued to focus on improving our culture and behaviours. This is part of our Company Values and Code of Conduct where we expect everyone to ensure that we are 'Safe at all times'.

The avoidable incidents that we experience include slips, trips and falls and injuries from handling, lifting and carrying. We need to ensure we are identifying and addressing the root causes of these incidents. These injuries are not good for employee health and wellbeing and also affect the operating efficiency of the business. During 2018-19 142 injuries were linked to manual handling and slips, trips and falls; compared to 190 injuries in 2013-14. We have focussed on these areas as part of our awareness campaigns and STEP training sessions over the last few years.

We encourage managers and employees to hold health and safety conversations and we measure the number of Director and senior manager conversations as a leading performance indicator. We also have an established 'STEP' health and safety culture training programme for operations. We have been cascading the STEP programme and messages throughout our support functions during 2018 and providing refresher training for operational managers.

Governance of Occupational Health and Safety

Welsh Water has an occupational health and safety management system that is certified to the internationally recognised OHSAS 18001:2007 standard.

Occupational Health and Safety (OHS) performance is detailed in reports which are reviewed by the Board and QEC. QEC also reviews and when appropriate, briefs the Board on significant incidents, near-miss reports and matters arising from the regular updates they receive on key OHS issues, developments and legislation. Under our management system, each tier of OHS management (e.g. the Board, executive directors, steering groups and consultative committees) has a defined responsibility to encourage a positive culture in the business.

We continue to use the Institute of Directors and HSE 'Leading Health & Safety at Work' guidance as a benchmark for Board involvement. Over the last 2 years Welsh Water Board and Executive team members have participated in Royal Society for the Prevention of Accidents (RoSPA) workshops for Directors and Leaders in health and safety governance and best practice.

We have clearly identified and risk assessed the 'Top 10' health and safety risks associated with Welsh Water activities. There is a rolling programme of major risk ongoing assurance reviews has been built into our AMP6 health and safety improvement plans.

We also continue to place great emphasis on monitoring contract partner performance and oversight of procedures that promote and share good practice across the wider Welsh Water business. This is reflected in the following Occupational Health and Safety Report, which covers the performance of Welsh Water and its outsourced service providers during 2018-19. The report includes the performance of our main contract partners along with data from our wider contractor base.

Our aim is not to detract from the legal responsibility of each outsourced service partner to have its own governance arrangements and to manage and monitor its own occupational health and safety performance and obligations. However, we do encourage continuous improvement in the performance of all partners via regular meetings between Welsh Water and contractor OHS specialists. Through this arrangement we share information right across the business, issue safety-alerts and generally oversee the management of OHS to a consistently high standard across all activities undertaken by or on behalf of Welsh Water.

In the year we saw more reportable injuries occur in our contract supply chain than with our direct employees. There are actions in place to monitor performance and share good practice in both our capital and operational supply chains. We have seen a number of reportable injuries where there has been a management system failure and contract partner improvement action plans and follow up audits have been used to address these risks. In order to fully reinforce this we have had 'face to face' meetings and workshops at Director and senior management level with both operational and capital contractors.



Peter Perry, Managing Director

Priorities for 2019-20

The priorities for the next year are to continue to manage and monitor our health and safety risks while delivering further business improvements. We will look at how we can all 'Go Home Healthy' at our 13th health and safety conference which will for the first time be held in North Wales in June 2019. This event will incorporate key messages on leadership and management, health and wellbeing, risk management, safety culture and contractor management.

Of particular focus during the year will be reviewing our occupational health and wellbeing service providers, further embedding our 'STEP' health and safety culture programme and working closely with our partners and supply chain as construction work on sites continues to increase during the final year of AMP6. We will continue to develop our competence and approach to process safety management, promoting good process management practices and learning from the improvements we have made at our COMAH site and from others across the industry. We will also ensure that we monitor our 'top 10' health and safety risks.

We will continue to work with the HSE in Wales as our regulator and actively support the HSE Strategy to 'Help Great Britain Work Well!

We will also work with HSE and our fellow Water Companies nationally via the Water UK Occupational Health and Safety Group and the Institution of Occupational Safety and Health (IOSH); where our Head of Health and Safety is an IOSH Council member.

Board and Executive members will undertake the new NEBOSH HSE Certificate in Health and Safety Leadership Excellence during 2019 to maintain their personal health and safety competence.

Conclusion

Our health and safety performance has continued to improve during 2018-19 and we have effectively managed our OHS to protect the health and wellbeing of the people who work to deliver services to Welsh Water's customers. It has been particularly encouraging to see a sustained focus on reporting 'leading indicators' with employees and contractors making Positive Interventions as well as a reduction in the rate of RIDDOR incidents.

We know that there is more to do on health and wellbeing and that this continues to be a driver of employee engagement within the company. This will continue to be a priority area during 2019-20 as we deliver our improvement plans and consolidate our Healthy Working Wales Platinum status.

We were proud to be invited to the 2018 HSE Board event in Cardiff and to be able to provide case studies on our supply chain engagement for this event. We were also delighted to be able to share the work we have done on health and wellbeing at the HSE's 2019 Connect conference and to obtain a Wales CIPD Award for our health and wellbeing initiatives. We are committed to delivering our AMP6 health and safety strategy, learning from others and working with the Health and Safety Executive and other regulators and the wider water industry.

Our challenges next year include further improving our health and safety culture in the support functions via our STEP campaign. Just over 50% of all injuries were due to slips, trips and falls or manual handling. We will also be developing new corporate and local action plans from our 2019 HSL Climate Survey findings alongside our business plan. This will help us to continue to reduce the number of lost time injuries and to further improve our employees' health and wellbeing.

We maintain our belief that everyone has the right to return home safely at the end of every day and strive to ensure that we are 'Safe at all times'

Peter Perry Managing Director

Review of performance 2018-19

This report details the occupational health and safety performance of Welsh Water, its contract partners and their main subcontractors in the twelve month period that ended on 31 March 2019.

The report covers the following activities:

- Asset Operation and Maintenance (all reservoirs, sewage/water treatment works and pumping stations, water and sewerage network systems including; mechanical/electrical/instrumentation work/CCTV surveys);
- Asset Investment (ownership/design/construction/refurbishment);
- Sampling and Laboratory Services (water and sewage);
- Meter Installations; and Provision and Maintenance of IT Systems.
- Commercial business functions.

Performance data

During 2018-19 we saw sustained improvements in our occupational health and safety performance.

The RIDDOR Incident Rate (RIR) (per 100,000 employees) for 2018-19 was 156; this is the lowest it has been in the last 12 years.

The total number of all injuries was 281 and we continue to see a high level of reporting for minor incidents, which is positive. There is a continued focus on preventing all Lost Time Injuries, not just those that meet the RIDDOR criteria. There were 30 Lost Time Injuries last year compared to 49 in 2014-15.

Incident category	2018-19	2017-18	2016-17	2015-16	2014-15	2013-14	2012-13	2011-12
Reportable injuries	8	14	12	19	20	23	24	29
Non-reportable injuries	261	236	238	207	275	313	292	261
Dangerous occurrences	2	1	3	2	1	4	4	4
Near misses	5414	5,779	4,963	5,020	2,574	1,986	2,224	1,174
Positive Interventions	56457	45,698	28,510	19,457	17,691	16,299	10,662	5,193
Reportable diseases	0	1	1	0	0	0	1	0
Enforcement actions	0	0	0	0	0	0	0	0
Days lost to injuries*	548	925	730	1,007	872	997	727	1,822
Days lost due to illnesses **	30,836	29,922	26,240	28,416	25,114	25,905	29,051	26,355
Average no employees (FTE)	6,419	5,765	5,275	4,860	5,324	4,924	4,508	3,878
Total hours worked in year	12,594,112	11,727,759	10,643,211	9,544,613	10,538,730	10,077,398	8,969,199	7,167,448

*Days lost within the year, including any carry-over days from previous year **All illness, including non-work related absence

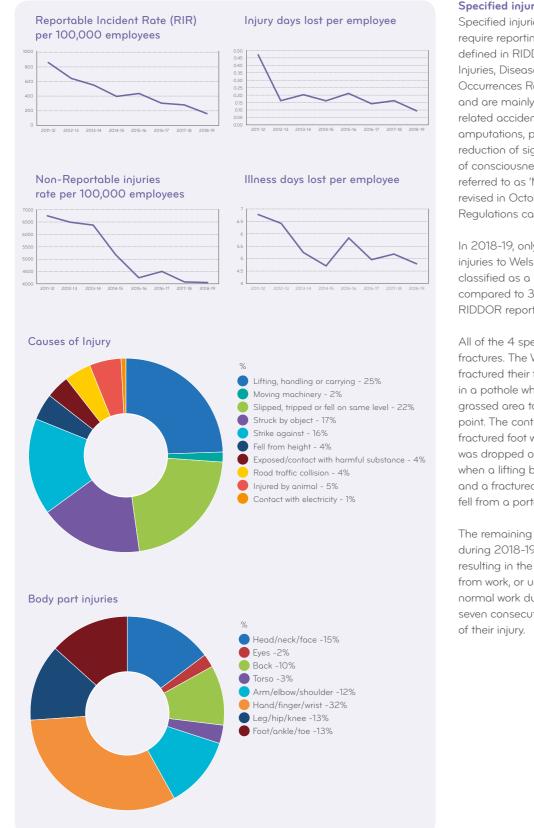
RIR – RIDDOR reportable incidents*	156	278	303	423	394	548	643	851
AIR – non-reportable injuries	4066	4094	4,512	4,259	5,165	6,357	6,477	6,730
Working days lost to injury per employee	0.09	0.16	0.14	0.21	0.16	0.20	0.16	0.47

*Includes all RIDDOR Injuries, Diseases and Dangerous Occurrences

It is worth noting that these numbers do not take account of the hours worked by the many smaller companies who work for Welsh Water, while the performance data does include all incidents reported by them while working our activities.

- Customer Services (including billing and income, credit management, call centre management and meter reading);

The days lost due to injuries has significantly reduced compared to 2017-18. There were a small number of injuries that resulted in longer term absences, but most resulted in fewer than 7 days off work.



Specified injuries to workers

Specified injuries to workers that require reporting to the HSE are defined in RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) and are mainly concerned with work related accidents resulting in fractures, amputations, permanent loss/ reduction of sight, serious burns, or loss of consciousness. This list was formerly referred to as 'Major Injuries' and was revised in October 2013 when the new Regulations came into force.

In 2018-19, only 1 of the 3 reportable injuries to Welsh Water employees was classified as a 'specified injury'. This compared to 3 out of the 5 contractor RIDDOR reportable injuries in the year.

All of the 4 specified injuries were fractures. The Welsh Water employee fractured their foot when they tripped in a pothole while walking across a grassed area to reach a fire evacuation point. The contractor injuries where a fractured foot when a trailer tow bar was dropped on it, a fractured arm when a lifting block came off a runway and a fractured hip when a contractor fell from a portable ladder.

The remaining 4 reportable injuries during 2018-19 were lost time injuries resulting in the individual being away from work, or unable to perform their normal work duties, for more than seven consecutive days as the result

Dangerous occurrences

There were two RIDDOR dangerous occurrences recorded during 2018-19.

There was an incident with a contractor who overturned an excavator while working in the highway. No-one was injured as a result of this incident. An incident investigation review was held with the contractor's senior management. It was identified that the road was narrow and the working space had been constrained, resulting in the excavator working too closely to the edge of the trench. The need to stop when faced with changes on site and re-assess the risks was reinforced.

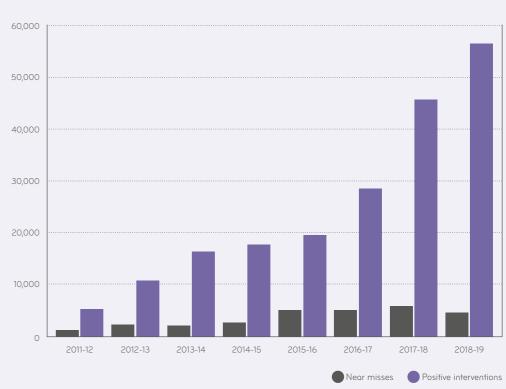
There was also a report of a contractor demolishing a small structure on site that included some asbestos containing materials without full controls being in place. The contractor identified several contributory factors to this incident including the competence and role of the site manager, the amount of contract supervision and insufficient training and hazard awareness.

Near miss reporting and positive interventions

We have continued to focus on encouraging employees and partners to report near misses and have defined them as 'an event or incident that had the potential to cause harm, without actually doing so'.

Near misses are investigated by managers and the resulting information is used to notify others of potential risks and to revise safe working processes and procedures.

Near Misses / Positive Interventions



During 2018-19, 4,514 near misses were reported. The number of these types of incidents being reported has increased as a result of several companies actively promoting near miss reporting and the development of better reporting tools allowing employees to easily make reports.

During 2018-19 we also encouraged our employees and contractors to make Positive Interventions and take action where there are Unsafe Acts or Conditions are observed. Over 55,000 interventions have been reported, which is over a 20% increase on the number recorded during 2017-18.

We believe that taking action to address these hazards and unsafe behaviours this has led to the prevention of some near miss incidents and also prevented accidents and injuries.

Reportable diseases

There were no RIDDOR reportable diseases during 2018-19.

Enforcement actions

There were no enforcement actions taken against Welsh Water during 2018-19.

There were some unannounced visits by HSE inspectors to Welsh Water construction sites during the year as part of HSE pro-active inspections. No actions were required as a result of these.

An HSE Construction inspector also visited a capital construction site in West Wales due to a concern raised by a third party. While no action was found to be required in relation to the concern; they did raise a Notice of Contravention for some pipe cutting work that was taking place on site. They raised concerns about the assessment of risks and controls to prevent respirable dusts and fumes. The contractor has put in place actions to ensure these are addressed.

Health and Safety Executive (HSE) **COMAH Audits and Process Safety** Performance Indicators (PSPIs)

We are subject to Health and Safety Executive (HSE) audits of our management controls at one of our Water Treatment Works which is a Lower Tier COMAH (Control of Major Accident Hazards) site. These audits have included reviews of the Process Safety Performance Indicators (PSPIs) we use to monitor that this site is operating safely, along with plant maintenance and management arrangements.

There were two HSE site visits in 2018. involving and HSE inspector and also an NRW representative. One visit was a review of our maintenance reaimes and the other was a review of our control of contractors and permit to work arrangements. The feedback from both visits was overall positive.

There are always some areas for further enhancement / continual improvements and we have worked with HSE on these. We have reviewed and revised some of the site risk assessments and further developed our procedures as a result.

Monitoring days lost due to Illness

In 2018-19, 30,836 working days were lost as a result of illness amongst the 6,419 Welsh Water and Partner employees giving an average number of days lost per employee of 4.8. This is an area we need to continue to focus on during the next year to ensure we are effectively managing absence and supporting employees and contractors to return to health and work.

The Welsh Water Attendance Management policy has been reinforced with all managers. We also launched a new package of wellbeing initiatives to help support employee fitness to work.

This included some tailored health and wellbeing awareness campaigns, gym membership benefits, and a new employee healthcare provision to support employees to get back to work more auickly

During 2017 we launched a new process to guide managers through how to respond to an employee injury, ensuring both the incident investigation and employee absence procedures were effectively followed. This was incorporated into a new attendance management training module that was launched as part of the refreshed leadership and management training programme in 2018.

We have continued to carrying out best practice benchmarking on health, safety and wellbeing programmes and have met with Admiral, Ty Hafan and Coventry Building Society in the last 12 months.

Conclusion - performance data and future challenges

The performance detailed in this report shows that Welsh Water has shown improvements in many areas over the year. However, there is more work to do to further reduce lost time injuries and to focus on improving our health and wellbeing; thus reducing sickness absence.

Our goal for 2019-20 is to continue this improving trend and, in particular, to drive down the number of avoidable incidents. Safety culture and human factors will continue to be of focus within our improvement activities.



Director Safety Day visit 2018, Aberystwyth

Occupational health and wellbeing

As part of our management of occupational health within Welsh Water, we have a contract with Caer Occupational Health Services. The contract provides a proactive and comprehensive Occupational Health service to all our employees.

The oim of the service is to:

- Implement comprehensive occupational health programmes that, as a minimum, meet the requirements of appropriate legislation and recognised best practice.
- Assist managers to help employees return to work following illness, accidents or general sickness absence. Ensuring that employees are fit for role.
- Increase employee awareness of general health issues; which in turn will encourage them to make informed choices about their lifestyles and working practices.

Welsh Water receives no confidential information from Caer Health in respect of individuals. Where, as the employer, we are requested to make adjustments in the workplace to accommodate the circumstances of an individual employee, and the individual expressly consents; certain information may be shared. Monthly reports are produced by Caer Health on their services and reviews are held with them to identify trends and ensure that effective support is in place. 291 management referrals for advice on employees were made to Caer Health during the financial year along with 79 review appointments. The

majority of the referrals were for either musculoskeletal disorders or mental health issues (27% and 33% of cases respectively)

A programme of operational health surveillance by Industrial Diagnostics Company commenced in September 2018. A series of clinics have been held at 12 sites across Wales with over 1500 employees invited for screening. This process is enabling us to effectively support employees and to identify and manage potential health risks before they become ill health absence issues.

Caer Health Services have worked with us during the year to support managers and employees to identify health risks arising from work activities and any health conditions that may affect employee well-being and performance at work.

They provide confidential and objective occupational health advice to allow the business to make timely and effective interventions to both support employees and also enable managers to manage risks and further reduce sickness absence. We have worked closely with them to implement our attendance management policy. We have been using task analysis tools and phased return processes to support colleagues to return to and remain in work.

In addition Welsh Water continues to offer an Employee Assistance Programme (EAP) that is available to all employees and their families. As well as providing information, it includes free access to counselling sessions to support individuals to effectively manage their mental health and wellbeing. We have promoted this service as part of our mental health awareness campaigns and have participated in a MIND film to show how good management can have a positive impact on employee mental health and wellbeing.

We have signed a Time to Change Wales pledge and the Department of Health Public Health Responsibility Deal. We have pledged to support employees with chronic conditions to remain well and in work and have signed their 'Alcohol in the Workplace' pledge. In addition we are supporting the IOSH 'No Time to Lose' occupational cancer campaign and sharing/promoting their campaign materials.

We are determined to continue to ensure that employees remain fit for work and will continue to focus on employee health and wellbeing during 2019-20. During the last 2 years we have held 8 smoking cessation classes for 144 colleagues and 40% have confirmed that they were still smoke free 3 months afterwards. These will be offered again to colleagues during 2019.

In 2018 we hosted 5 voluntary wellbeing clinics and we now have 7 'Wellbeing Champions' to support colleagues and managers to maintain positive mental health and wellbeing. These roles were found to be very beneficial and we are increasing the number of colleagues trained as wellbeing champions. An overview of our wellbeing initiatives was presented at the HSE Connect conference in February 2019.

We have also worked with external organisations during the year, including Prostate Cymru and NHS Screening services. They have delivered presentations and provided information and advice to employees to help them manage their health and wellbeing.

Occupational health and safety (OHS) management system and risk

OHSAS 18001:2007

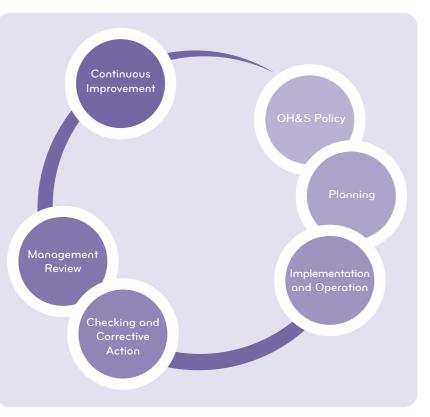
Occupational Health and Safety Assessment Series 18001:2007 (OHSAS) is the assessment specification for the Welsh Water occupational health & safety management system. It is designed to consistently identify and control health and safety hazards and risks, reduce the potential for accidents, aid legislative compliance and improve our overall performance. As with ISO 9000 and ISO 14001, the OHSAS 18001 system uses a cycle of plan, do, check, review and improve.

The following key areas are addressed by OHSAS 18001:

- Planning for hazard identification, risk assessment and risk control OHSAS management programme structure and responsibility
- Training, awareness and competence
- Consultation and communication
- Operational control
- Emergency preparedness and response
- Performance measuring, monitoring and improvement

OHSAS 18001 is based on establishing and maintaining a formal occupational health and safety management system to ensure a structured, systematic approach to risk management.

Welsh Water first obtained the OHSAS 18001:1999 standard in 2007-08. In February 2009 we were awarded the OHSAS 18001:2007 international health and safety management systems standard.



The scope covers the operation, maintenance, contract management and management of potable and waste water services including storage and treatment of sewage sludge and advance digestion. Administration of water and wastewater services provision including contract management. The provision and management of educational and recreation facilities for the public. The operation, management and maintenance of the potable water network and leakage management.

There is an internal annual review of the effectiveness of our OHS management system and the business uses this as an opportunity to identify and drive continual improvement.

The independent certification process, and subsequent regular certification compliance audits, also ensures that we continue to take effective measures and implement rigorous controls to identify and manage the health and safety risks associated with our business activities.

To support our transition from OHSAS 18001 to ISO45001 in 2019, members of the Health and Safety, IMS and Business Assurance teams completed formal training in this new standard durina 2018.

How we manage OHS risk

Underpinning our management system we have internet-based tools for recording and reporting on injuries, incidents, and illnesses.

An IT system, Assure was launched in 2015 and we have worked closely with the business to effectively embed and utilise this tool. It provides a facility for action tracking and local management of incident reports and allows managers to develop tailored health and safety performance dashboards to suit their needs. It also allows us to track safety conversations, positive interventions and improvements.

All incidents must be immediately reported and investigated by relevant line managers. Main contractor partner organisations are required to provide monthly OHS performance data reports.

Illness and absence records are maintained by Welsh Water and contractor Human Resources departments. They identify causes and monitor rates of absence.

We have developed and further improved the quality of our internal performance reports over the last few years to ensure that meaningful data is presented and areas for improvement are clearly identified. This has involved analysis of employee and main contractor data and the inclusion of other contractors and suppliers. We are continually looking to see how we can further enhance the use of the dashboards and reports to help managers to monitor and manage their performance locally.

Occupational health & safety training and competence

We have continued to develop and deliver a range of bespoke OHS training courses through both face to face and E-learning media during the year. Training and toolbox talks that have been reviewed and refreshed during 2018 have included: Attendance management, COSHH assessment, contractor management and confined space working. The passport scheme for contactors working on our potable supply pipes has been extended. In addition we have delivered bespoke corporate induction health and safety sessions for new employees, apprentices and graduates.

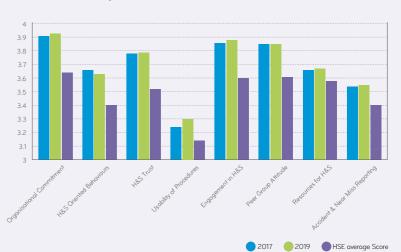
Promoting good practice

The following illustrates some actions taken in 2018-19 to mitigate OHS risk and raise awareness:

Employee Engagement and HSL Climate Surveys:

The results of our 2018 annual employee engagement survey showed that 97% of all our employees were clear what was expected of them with regard to health and safety and 94% believed that health and safety is taken seriously at Welsh Water. In addition employees scored us 83% positively for promoting good health and wellbeing.

During February 2019 we also carried out our second bespoke H&S climate survey. 74% of all employees responded and we scored above the HSE average scores for all the different aspects of H&S management.



Each team will use the information to identify areas for further improvement and put in place local action plans. The H&S Steering Group will monitor progress against these during 2019.

Director health and safety days:

Over the last 12 months we have held several company-wide Director health and safety days. These focussed on our STEP safety culture and behaviours, musculoskeletal disorders and back care, office safety, confined spaces awareness and winter preparations / Slips, trips and falls. Senior managers were involved in leading briefing sessions and many of the Directors participated in health and safety conversations and visits to sites. The Water, Waste and Capital teams have also carried out some targeted H&S stand-down events during the year to focus on specific topics relevant to their activities. These included reminders about how to 'Take 5' and have effective health and safety conversations, good contractor management practices and sharing learning from incidents.

Major risks review: We have identified the 'Top 10' health and safety risks associated with Welsh Water activities. These are those risks that have a low probability, but a high severity, should they arise.

H&S Climate Survey - Overall Scores

A rolling programme of major risk assurance reviews has been built into our AMP6 health and safety improvement plans. During 2018-19 the Health and Safety Team have carried out some operational site visits to check on the management controls in place to address the risks from working near deep water and identify any improvements. We have also reviewed our managing occupational road risk procedures.

Process safety and best practice benchmarking: We have been developing our process safety management understanding and skills over recent years. We have participated in a range of Water Industry benchmarking and best practice events. In 2014 we also joined the South Wales Responsible Care Cell to learn from those in the chemical industry and have shared internally our learning from working with HSE on COMAH. In 2015 we participated in a Water Industry process safety event, established a new Welsh Water Process Safety Group and arranged a Cogent Skills training course for selected Directors and Heads of Service in Process Safety Leadership. The Process Safety Group are co-ordinating all our process safety improvement activities. During 2016 they developed a tool box talk for operatives and have worked with Hastam to develop a bespoke course on 'Managing Major Hazards' that was delivered to selected operational managers and supervisors during 2017. During 2018 we have continued to hold process safety forums and also participated in a water industry process safety group.

STEP safety culture programme:

In recent years we have actively encouraged senior managers and employees to have regular health and safety conversations. The Executive team and over 50 senior managers have participated in our safety culture training programme.

Senior operational Directors and managers have quarterly objectives to conduct site visits and report back on their conversations. We have been monitoring the number of conversations held, the teams and areas visited and the good practices and areas for improvement identified. This has been included as a lead indicator in our quarterly health and safety performance reports.

We have also devised and delivered a safety culture training programme for operational managers and supervisors. This has been badged as our STEP (Safety Takes Every Person) programme. Delivery commenced in January 2014 and over 731 managers and supervisors have attended these training sessions. This has been supported by a series of workshops led by the health and safety team to facilitate manager learning and ensure that the training principles are being used locally

During 2014 we developed and delivered a 'train the trainer' module for over 70 operational colleagues, providing materials and tools for them to deliver short awareness workshops for all operational employees. This was extended in 2015 and now we have over 166 STEP Champions. Each year, new materials are developed for them to deliver which incorporate health and wellbeing messages. In 2018 a bespoke STEP programme was developed and delivered in the Retail business function and we delivered 4 workshops for all our Trade Union Representatives.

During 2018 this programme was extended to all other support functions.

A short case study on the STEP programme was included on the HSE website to support their H&S Strategy, enabling us to share ideas and improvements with others.

TRACA coach programme:

To support our manual handling training programme and ensure that colleagues continue to use safe handling techniques we have 268 trained 'Traca' coaches. The coaches carry out manual handling observations and support employees and managers to identify any areas of concern. They will also support employees returning to work after injuries to ensure they are able to safely carry out their role. Completion of these observations are one of our leading indicators.

Safety alerts and bulletins: Many health and safety alerts, bulletins and briefings were also issued during the year, covering issues from equipment failures, procedural changes and incident investigation findings. These are distributed across the business, including contract partner organisations, and are used to highlight areas of potential risk to occupational health & safety. Alerts can originate from internal and external sources, including our contract partners, other water companies and the HSE



Karen Rogers, H&S Manager visits the Biosolids team

Governance

Welsh Water's OHSAS 18001 accredited safety management system defines the processes, policies, legal framework and structures that we have established to manage all aspects of our operation. It provides a governance framework by setting out the responsibilities for the management of occupational health and safety, and ensuring we remain focused on the accountability of individuals and teams within the business. It uses both reporting structures and formal management systems to identify and control any operational or other business risks.

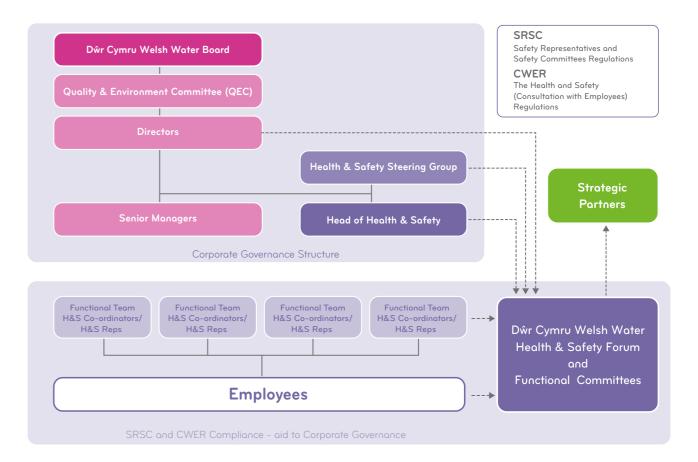
Good governance also requires us to have proactive, open and transparent reporting relationships with key stakeholders. In this respect, key stakeholders include the community we serve, Welsh Water's regulators, supply chain partners and government, as well as all employees across the business.

During 2016 and 17 Welsh Water Board and Executive team members participated in Royal Society for the Prevention of Accidents (RoSPA) workshops for Directors and Leaders. They will be undertaking the new NEBOSH HSE Certificate in Health and Safety Leadership Excellence during 2019 to maintain their personal health and safety competence.

Roadmaps and unit assessments continuous improvement action plans

In 2011-12, we launched a team specific 'unit assessment' process. This identified the health and safety risks and management controls that should be in place for each team. The unit assessments covered a 3 year period and were reviewed regularly to ensure that team procedural briefings were delivered and that risk controls were in place

In April 2017 this was changed to an annual process to ensure that updates to business arrangements and controls were reflected in a timelier manner. Progress against unit assessment targets is included in management health and safety performance reports. We are further reviewing the effectiveness of this process and working with users to develop our monitoring and improvement tools during 2019.



Monitoring performance

Our arrangements to review occupational health and safety performance are described in the Organisational Structure chart.

A monthly H&S performance dashboard is produced for use on company notice boards. Quarterly reports are presented to the Board Quality and Environment Committee (QEC) meetings for their review. There are also operational leadership team specific reports that are cascaded through line management to support performance monitoring and management locally.

- Health and safety steering group:

Monitoring and review of overall occupational health and safety performance and progress against improvement initiatives is undertaken during bi-monthly meetings involving the Director responsible for health and safety and other selected Directors and senior managers. This group was established in April 2011 and has ensured that business focus is kept on improving health and safety. This has included reviewing the outputs of improvement projects and internal reviews, such as the health and safety confined spaces risk review and the outputs from internal audits and emergency exercises.

- Main contract partner performance reviews: Monitoring

and review of contractor occupational health and safety performance is undertaken during regular meetings between Welsh Water's Health and Safety Managers and the Health and Safety Managers of our main partner organisations. These groups review progress against improvement action plans, together with details of any reactive events such as accidents and incidents. Audit reports are also discussed and checks made to ensure that any corrective actions have been closed out within agreed timescales. Best practice and lessons learned are identified and, where appropriate disseminated further. The Capital Partner Alliance has also developed joint standards and held seminars and workshops on key areas of risk.

 Welsh Water's health and safety consultation forum: This Trade Union consultation group meets quarterly to review policies, procedures and performance and to consider opportunities for further improvements to our management arrangements. Chaired by the Managing Director, the forum links back to the Welsh Water Health and Safety Steering Group, which approves priorities and, where required, the release of resources.

Contractor Health and Safety Management

- Selection of contractors Before any contractor is appointed to work for Welsh Water, the company will be required to provide evidence of a current SSIP (Safety Schemes in Procurement) registration as a minimum. This sits alongside the full procurement process for contractor assessment.
- Setting performance targets

As part of the appointment process for main contractors and partners Welsh Water Managers, supported by the Health and Safety team will meet organisations and discuss their health and safety management arrangements. This will include any company specific health and safety improvements and objectives; delivery of which will form part of their contracts.

Monitoring performance

Performance monitoring will involve both pro¬active and re-active monitoring arrangements. This information is discussed at routine review meetings and used to assess whether the pro-active measures are having an impact on reducing the accident/incident rates, and assist with trend analysis and wider learning. Any recommended improvements identified during contract performance reviews are based upon a joint assessment of the occupational health and safety risks, and can include both quantitative and qualitative targets. Any partner improvement action plans are reviewed and updated on a regular basis.

Auditing performance - Cross partner audits

Welsh Water has previously hosted programmes of cross partner and safety management system audits, where main partners are audited by their peers. A series of focussed site audits were held as part of the tendering exercise for the AMP6 capital programme. Cross audits can demonstrate conformance with policy and procedures, but this is not the main benefit. We can gain a long term view of the health and safety competence of our partners and also give them a view of health and safety procedures and processes in other organisations. This facilitates considerable sharing of good practice and cross fertilisation of ideas. There is a process to facilitate this practice during AMP6 and it will evolve during the next few years as we deliver our improvement plans.

Insurance audit reviews

We take pride in our close working relationships with our contract partners and have extended this good practice to encompass other service providers, like RSA, who provide insurance for the business and our capital programme. This working relationship and programme of insurer reviews has benefits for both parties. RSA can review our partners and their systems to clearly understand the risk to the business, and we benefit from their work with other clients who might have different procedures for minimising losses. A programme of insurer reviews takes place during the year, having regard to the assessment of key risks.

- OHSAS 18001 audit

The OHSAS 18001 occupational health and safety management system is subject to audit every six months by the external accreditation body. In addition, Welsh Water has established a programme of internal audits, which are designed to identify any opportunities for improvement. There are plans in place to migrate to ISO 45001 during 2019.

- ADR (Carriage of Dangerous Goods by Road) Inspections

During 2018 Welsh Water were audited on our compliance with the ADR legislation. This included visits to operational sites across Wales. The auditor confirmed a good level of compliance with the legislation. In addition they identified some areas for future improvements. This included a suggestion to include ADR in a future emergency planning simulation exercise.

Board review of performance

A monthly report is prepared for the executive management team and a quarterly performance report is presented to the Board Quality and Environment Committee (QEC). In addition to performance, this report addresses key issues of H&S policy and procedure, training and regulatory engagement and communication. The Board also reviews and endorses the annual occupational health and safety report before it is published at the annual general meeting.

Industry reporting

Historically UK water companies were required to submit a report to the industry regulator Ofwat on their health and safety performance. This included occupational health and safety performance data for core employees and partners and was commonly referred to as 'Table 41'. In addition, Ofwat has previously selected one or more occupational health and safety specific topics on which all companies must report. All performance data previously submitted to Ofwat is available to the public and can be viewed on their website.

From 2012, there was no specific requirement to submit health and safety data to Ofwat. However, Welsh Water has continued to participate in a water industry cross-company performance benchmarking system that is supported by the Water UK Occupational Health and Safety Group.

Recognising excellence and achievements

Health & safety conference

In June 2018 Welsh Water held our twelfth annual health and safety conference. Over 300 individuals, including executive and non-executive directors, senior managers, safety representatives and health and safety specialists from across the business, attended the event, sponsored by our insurers RSA.

The theme for the event was 'Stepping Forward' and focussed on how everyone has a part to play in ensuring colleagues and partners remain Safe, Healthy and Happy. The event looked at what we can all do to prevent injuries and ill health as part of our health, safety and wellbeing improvement strategy. (The 'Journey to Zero' strategy with our ambition of achieving zero reportable and lost time injuries).

The keynote presentation involved the use of a professional acting company, Dramanon, who showed the impact that work can have, both positively and negatively on mental health and wellbeing.

Delegates were able to participate in a series of workshops highlighting key aspects of our health and safety management system. These included sessions covering:

- Road Safety
 The Domino Effect, South Wales
 Fire and Rescue Service
- Safe Manual Handling
 The Formula 1 Challenge,
 Pristine Condition
- Preventing Injuries and III Health Hand Injuries and Skin Conditions, Liscombe
- Hazard Awareness
 Recognising Hazards in
 Construction, Capital Alliance
- Mental Health
 A Personal Story, Time to Change Wales

Excellence awards

Introduced in 2007, the Welsh Water Occupational Health and Safety Excellence Awards recognise excellent performance by our employees and contract partners. Each year there are awards for health and safety excellence and awards for individuals and teams to recognise their 'outstanding contribution to health and safety! These awards are a highlight of the Welsh Water Health & Safety Conference.

The Welsh Water Health and Safety Excellence Award winners as voted by delegates at our 2018 event were the Caban Coch Project Team. The team safely managed a complex construction project over a 2 year timeline to replace valves and pipework at this reservoir, while maintaining customer supplies. This was a challenging task involving the use of specialist dive teams alongside construction experts.

The Supply Chain Excellence Awards were won by Skanska and Mancoed VM. Skanska demonstrated how their management systems were being used to effectively engage with their employees and supply chain including the benefits gained from their Injury Free Environment (IFE) programme. Mancoed VM demonstrated their task management system and how they effectively manage the H&S of their mobile grounds maintenance workers.

The Health and Wellbeing Award went to Stonbury for the work of their social committee in engaging employees in thinking about and improving their health and wellbeing.

The Outstanding Contribution Award went to Martin Jones of MMB. Martin was recognised for his personal health and safety leadership on a challenging construction scheme in Chester. His focus was on the wider supply chain as well as the MMB employees and he worked closely with the site team to develop new safe systems of work to prevent underground cables from being damaged on site.

External recognition

Welsh Water has been recognised by Welsh Government for our work on health and wellbeing. We achieved the Healthy Working Wales Bronze Corporate Health Standard in 2015, the Gold Standard in 2016 and successfully completed the Platinum Standard in 2018.

We entered the RoSPA Health and Safety Awards in 2018 and were awarded Gold status for the second year running. To achieve this award we had to submit 5 years of H&S performance data for ourselves and our contract partners as well as completing a range of evidence based case studies on our health and safety management arrangements. In addition, the Welsh Water Capital Alliance and in-house Engineering Team received 2018 RoSPA Gold Awards for their health and safety performance and improvement initiatives.

In April 2018 Welsh Water were awarded the Swansea and West Wales Occupational Safety Group Presidents Award for Safety Training.

We entered the 2018 Wales Chartered Institute of Personnel and Development (CIPD) awards and were proud to win the Gold Award for the Best Health and Wellbeing Initiative.

We also received a Commended Certificate at the 2018 Safety Groups UK Innovation Awards.



The Health and Wellbeing Steering Group with the CHS Award 2018



Some of our contract partners have also received external recognition in the last 12 months for their achievements in occupational health and safety.

These include:

RoSPA Gold Award 2018 Lewis Civil Engineering, Bridges Electrical Engineers, Skanska

RoSPA President's Occupational Health & Safety Award 2018 Mancoed VM, Morgan Sindall, Skanska

RoSPA Construction Commercial Industry Sector Award 2018 Morrison Utility Services

RoSPA Gold Fleet Safety Award 2018 M Group Services Plant & Fleet Solutions

FORS Bronze Award 2018 Lewis Civil Engineering

Considerate Contractor Gold Award 2018 Skanska, Morgan Sindall

The National Skills Academy People & Power Awards 2018 Outstanding Contribution to Health, Safety and Environment, Morrison Utility Services

Women in Construction and Engineering Awards 2018 Best Woman in Health and Safety, Morgan Sindall

External representation

The Head of Health and Safety is a long standing member and past Chair of the Water UK Occupational Health and Safety Group. This group works to share learning and improve performance collectively across the water industry. Having also been a member of the Institution of Occupational Safety and Health (IOSH) for 25 years, they are currently serving their second 3-year term as an IOSH Council member. The Council holds the Board of Trustees accountable for its performance against key responsibilities on behalf of members and debates key strategic, professional and policy issues.

In February 2016 Welsh Water were invited by the Health and Safety Executive to host the Welsh launch of their new 'Helping Great Britain Work Well' strategy. We welcomed members of the Health and Safety Executive and businesses across Wales to our Tŷ Awen site. Neil Craig, Head of Field Operations (Wales) and Isobel Garner, Board Member from the HSE joined Peter Perry, our Chief Operating Officer to talk about the Help Great Britain Work Well campaign. This campaign has six associated strategies which will bring a renewed emphasis on improving health in the workplace, as well as building on the highly successful UK track record on safety.

We have continued to support this strategy. In 2017 we submitted two case studies that were used by HSE on their website to share best practice with others. A summary of the actions we have taken as part of our commitment to tackling ill health was included in the delegate brochure for the HSE's London Conference held in September 2017. We provided two case studies on our approach to working with our contract partners and supply chain to support the HSE Board Stakeholder Event in Cardiff in June 2018. We have also presented on our approach to managing health and wellbeing at the HSE Connect Conference in February 2019.

We have been working closely over several years with the emergency services and other external stakeholders to deliver our 'One Last Breath' reservoir safety campaign. This has been aimed at educating members of the public about the dangers of swimming in reservoirs and has included presentations at educational establishments alongside some hard hitting films that have been shared on social media.

The Welsh Water Managing Director and Board H&S lead has also participated in the HSE Estates Excellence Board meetings and has worked with them to support other companies to improve their H&S performance.



