

Annual Report

Year ended 31 March 2020

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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 quality 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 2020 (2019–20) saw us continue to improve our health and safety management systems and processes. It was the fifth 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 2019-20 overall performance has continued to improve with a further reduction in the rate of HSE RIDDOR reportable incidents (RIR). The Water business is approaching nearly 5 years without a RIDDOR reportable employee injury. The number of Lost Time Injuries (LTIs) has 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 struck an overhead cable. 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.

We have also continued to report and review any incidents involving customers and members of the public that have occurred during the year. While many of our reservoirs are open to the public for walking and other managed activities; we have continued our education and communications programmes to highlight the dangers of swimming in reservoirs. Where we are working in or near customer properties, we are focussed on providing high standards of health and safety as part of our customer service.

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 have continued to 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 review and improve our attendance management and monitoring systems. Specifically introducing a new mental health awareness 'Talking Toolkit' 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 2019. 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 an increase in the total number of working days lost from injuries during 2019 -20. 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 continue to focus on with our own employees and contract partners.

We are also continuing to utilise information from external bodies such as the HSE, Public Health Wales and IOSH to promote good health and wellbeing.

We are increasingly using occupational health specialists, including ergonomists and occupational hygienists to help review our risks and controls.

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 health, safety and wellbeing

The last annual review of our health and safety performance was held with the Board in May 2019 and we were able to demonstrate good improvements against all the identified areas in our AMP6 strategy. This strategy has 5 key themes: Leadership and Management, Health and Wellbeing, Risk Management, STEP and Culture and Contractor Management.

To maintain the focus on improving our health and safety performance, we have refreshed the health and safety improvement strategy for the next 5 years (AMP7) and it has been approved by the Board. We will report progress against this through our quarterly health and safety performance reports to the Quality and Environment Committee (QEC). This strategy provides a clear framework for how we will achieve our aspirations (our 'Journey to Zero'). It has been communicated to all employees and aims to ensure that good health and safety practice is embedded across the business.

Some highlights during the last year have been:

NEBOSH HSE Certificate in Health and Safety Leadership Excellence

The Board and Executive team completed this new qualification. This enabled them as individuals to reflect on and to further develop their personal health and safety competence and leadership.

ISO 45001 Accreditation

The successful transition from OHSAS 18001 to the new ISO 45001 management standard. Demonstrating our commitment to continuous improvement.

Employee Engagement

Our 2019 annual employee engagement survey continued to show very high scores for health and safety. 96% of all our employees were clear what was expected of them regarding health and safety and 92% 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.

2019 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.

Working with our Partners

We have continued to work closely with our contract partners during the year. During 2019 we delivered 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 (STEP) – 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.

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 2019-20 145 injuries were linked to manual handling and slips, trips and falls; compared to 190 injuries in 2013-14.

We are working with a new external provider to develop and deliver our STEP safety culture programme for AMP7. We will continue to focus on the areas that cause injuries and ill health as part of our 2020 awareness campaigns.

Governance

Our health and safety 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 issues, developments and legislation. Under our management system, each tier of management (e.g. the Board, Executive Directors, steering groups and consultative committees) has a responsibility to encourage a positive safety culture. We continue to use the Institute of Directors and HSE 'Leading Health & Safety at Work' guidance as a benchmark for Board involvement.

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

We also continue to place great emphasis on monitoring contract partner performance and ensuring we promote and share good practice across the business. This is reflected in this report which includes the performance of our main contract partners along with data from our wider contractor base. We encourage continuous improvement in the performance of all partners via regular meetings and sharing of information.

Through these arrangements we aim to ensure a consistently high health and safety standard across all activities undertaken by or on behalf of Welsh Water.

In the year we saw a reduction in the number of reportable injuries in our contract supply chain. We have continued to work closely with our contract partners monitoring improvement action plans and conducting inspections and audits. There has been considerable focus and support from Directors and senior managers working in partnership with our contractors to ensure our high-risk construction activities are effectively managed.



Priorities for 2020-21

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 launch our AMP7 health, safety and wellbeing strategy in April 2020 and will share our aspiration for 'Everyone, safe, healthy and happy, every day'.

While plans were in place to hold our 14th health and safety conference in Swansea in June, this event has been impacted by the Covid-19 pandemic and postponed to 2021. We will still be recognising colleagues who submitted entries to our annual health and safety awards and will celebrate this virtually, We will continue our focus on health, safety and wellbeing, supporting colleagues and contract partners as we develop new ways of working.

April also sees the start of a new occupational health and wellbeing service and STEP health and safety culture provider. We will continue to work closely with our partners and supply chain as we start our next 5-year investment programme. We will continue to develop our competence and approach to process safety management, promoting good process management practices and learning from others. 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).

Conclusion

Our health and safety performance has continued to improve during 2019-20 and we have effectively managed our occupational health and safety risks 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 2020-21 as we deliver our improvement plans and consolidate our Healthy Working Wales Platinum status.

We are committed to delivering our AMP7 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 via our STEP campaign, while also adapting to new ways of working due to the impact of Covid-19. Just under 50% of all injuries last year were due to slips, trips and falls or manual handling and these risks still remain. We will also be supporting teams to deliver their local action plans from our 2019 Health and Safety Climate Survey. 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 value that Safety Takes Every Person and our aspiration for 'Everyone, Safe, Healthy and Happy, Every Day'.



Peter Perry Chief Executive

Review of performance 2019-20

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 2020.

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);
- · Commercial business functions;
- Customer Services (including billing and income, credit management, call centre management and meter reading);
- Meter Installations; and Provision and Maintenance of IT Systems.

Performance data

During 2019-20 we saw sustained improvements in our occupational health and safety performance. The RIDDOR Incident Rate (RIR) (per 100,000 employees) for 2019-20 was 148; this is the lowest it has been in the last 13 years.

The total number of all injuries was 282 and we continued to see a high level of reporting for minor incidents, which is positive. The All Injury Rate (AIR) (per 100,000 employees) has increased as although we had a similar number of injuries to last year, there was a significant reduction in the number of employees on our capital programme, which has an adverse impact on this rate.

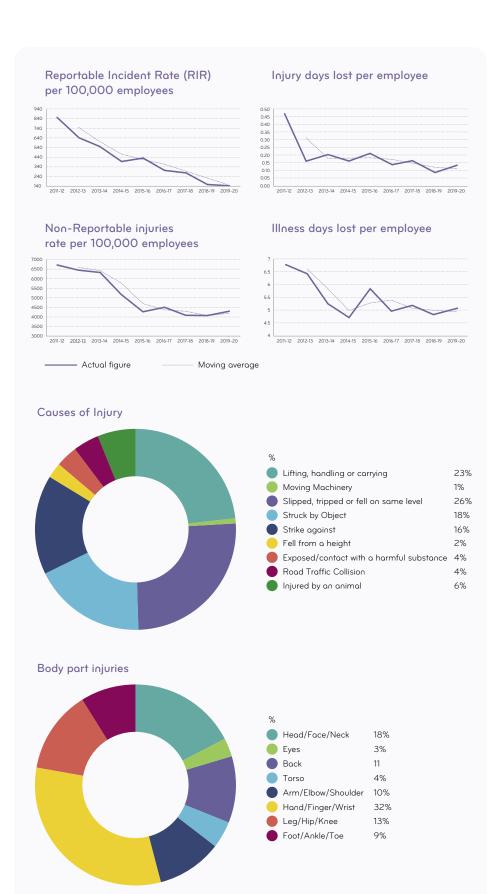
There is a continued focus on preventing all Lost Time Injuries, not just those that meet the RIDDOR criteria. There were 28 Lost Time Injuries last year compared to 49 in 2014-15. The days lost due to injuries has increased compared to 2018-19. There were a small number of injuries that resulted in longer term absences, but most (70%) resulted in fewer than 7 days off work.

Incident category	2019-20	2018-19	2017-18	2016-17	2015-16	2014-15	2013-14	2012-13	2011-12
Reportable injuries	8	8	14	12	19	20	23	24	29
Non-reportable injuries	262	261	236	238	207	275	313	292	261
Dangerous occurrences	1	2	1	3	2	1	4	4	4
Near misses	4,395	4,514	5,779	4,963	5,020	2,574	1,986	2,224	1,174
Positive Interventions	73,754	56457	45,698	28,510	19,457	17,691	16,299	10,662	5,193
Reportable diseases	0	0	1	1	0	0	0	1	0
Enforcement actions	0	0	0	0	0	0	0	0	0
Days lost to injuries*	826	548	925	730	1,007	872	997	727	1,822
Days lost due to illnesses **	30,930	30,836	29,922	26,240	28,416	25,114	25,905	29,051	26,355
Average no. employees (FTE)	6,081	6,390	5,765	5,275	4,860	5,324	4,924	4,508	3,878
Total hours worked in year	12,138,308	12,209,136	11,727,759	10,643,211	9,544,613	10,538,730	10,077,398	8,969,199	7,167,448

RIR - RIDDOR reportable incidents*	148	156	278	303	432	394	548	643	851
AIR- non-reportable injuries	4,309	4,085	4,094	4,512	4,259	5,165	6,357	6,477	6,730
Working days lost to injury per employee	0.14	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.



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 2019–20, only 3 out of the 8 reportable injuries to Welsh Water employees and contractors were classified as 'specified injuries' under RIDDOR. This compared to 4 out of 8 last year, showing a reduction in injury severity.

All 3 specified injuries were fractures to arms/wrists linked to manual handling and slip, trip, falls. One Welsh Water employee fractured a bone in their arm while disconnecting some pipework by hand, another employee fractured a wrist when they slipped and fell while attempting to remove a pump from the back of their vehicle. A contractor fractured their arm when they fell while descending a tower scaffold ladder.

The remaining 5 reportable injuries during 2019–20 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 of their injury.

Lost time injuries

We are continuing to see reductions in the number of lost time injuries, and this is an area of specific focus for the next 5-year period. We will be using our health and safety awareness campaigns and our STEP improvement programmes to focus on those activities and behaviours that result in injury.

Dangerous occurrences

There was one RIDDOR dangerous occurrence recorded during 2019-20.

This was an incident on a Capital construction site where a contractor's excavator struck an overhead power cable. The incident investigation identified two areas for learning. The first was raising awareness with colleagues about helping out without 'Taking 5' and ensuring that they had assessed all the risks. The second was ensuring that it is clear who is 'in charge' at any given time on a construction site. This incident and the learning was reviewed with all construction site managers at a safety forum event.

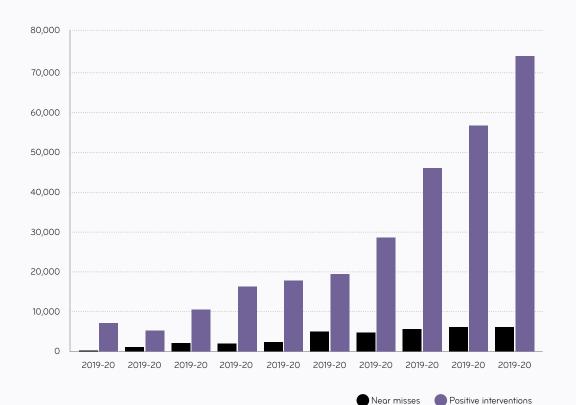
Near miss reporting and positive interventions

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.

During 2019-20, 4,395 near misses were reported. The number of these types of incidents being reported has slightly reduced as a result of our capital contractors reviewing their data capture processes and reassigning near misses as positive interventions, where appropriate.

We have continued to encourage our employees and contractors to make Positive Interventions and take action where unsafe acts or conditions are observed. Over 70,000 interventions have been reported, which is over a 25% increase on the number recorded during 2018-19. 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.

Near Misses / Positive Interventions



Reportable diseases

There were no RIDDOR reportable diseases during 2019-20.

Enforcement actions

There were no enforcement actions taken against Welsh Water during 2019-20.

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.

Following a minor fire involving a UPS battery at one of our water treatment works, the Mid and West Wales Fire Safety Inspecting Officer visited the site to review our fire management controls. They noted that our investment in fire safety was enough to ensure that no one was hurt. They did recommend some improvements to the fire doors on site which have been addressed by the Head of Water Production.

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.

HSE and Natural Resources Wales (NRW) representatives visited our COMAH site on 14th November as part of our annual COMAH intervention plan. They reviewed the site Major Hazard Risk Assessments. Their risk assessment specialist provided us with additional guidance that is being used to review and further improve our site management documents.

Monitoring days lost due to Illness

In 2019-20, 30,930 working days were lost as a result of illness amongst the 6,081 Welsh Water and Partner employees giving an average number of days lost per employee of 5.0. 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 be able to return to health and work.

In preparation for AMP7 we have reviewed and refreshed our Attendance Management policy. This has been rolled out to all managers in March 2020. Additional guidance has been produced to support managers including a Welsh Water version of the HSE's 'Talking Toolkit'. This is a tool to help support discussions about mental health and wellbeing and to explore any concerns / identify solutions.

We also have a package of wellbeing initiatives to help support employee fitness to work. This includes tailored health and wellbeing awareness campaigns, gym membership benefits, and an employee healthcare provision to support employees to get back to work more quickly.

Conclusion - performance data and future challenges

We have continued to undertake best practice benchmarking on health, safety and wellbeing programmes. We have met with leaders from Natural Resources Wales, Wessex Water and Anglian Water in the last 12 months. In addition, we have participated in two benchmarking sessions with a range of external organisations, facilitated by Hastam. These sessions covered 'creating a reporting culture and making the most of your data' and 'the usability of procedures and instructions'.

The performance detailed in this report shows that Welsh Water has continued to maintain and make improvements 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 2020-21 is to continue to drive down the number of avoidable incidents. Safety culture and human factors will continue to be of focus within our improvement activities.



HSE Day - 9 September 2019. Dave Holthofer – Head of Bio-resources Business & Fiona Woodley - HGV driver

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 aim 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 sickness absence due to illness or injuries.
 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 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 on their services and reviews are held with them to identify trends and ensure that effective support is in place. 304 management referrals for advice on employees were made to Caer during the last financial year along with 62 review appointments. Most referrals were for either musculoskeletal disorders or mental health issues (27% and 38% of cases respectively).

A programme of operational health surveillance by Industrial Diagnostics Company commenced in September 2019. 98 clinic days were held at 13 sites across Wales and over 1000 employees were screened. Out of these, 52 individuals were referred to Caer for further advice. This process is enabling us to effectively support employees and to identify and manage potential health risks before they result in employee ill health and sickness absence.

Caer 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 wellbeing and performance at work. They provide confidential and objective occupational health advice. This allows the business to make timely and effective interventions to both support employees and enables managers to manage risks and prevent sickness absence. We have worked closely with Caer to implement and improve our attendance management policy and procedures. We have developed task analysis tools and phased return processes to support colleagues to remain in and return to 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 via a website and telephone service, 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.

In 2019 we hosted 7 voluntary wellbeing clinics and we now have 18 'Wellbeing Champions' to support colleagues and managers to maintain positive mental health and wellbeing. We are increasing the number of colleagues trained as wellbeing champions following positive feedback.

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.

Over the last 2 years we have held 10 smoking cessation classes for 164 colleagues with 41% confirming they were still smoke free 3 months afterwards. We have also worked with external organisations, including Prostate Cymru and NHS Screening services. They have delivered presentations and provided information and advice to help employees manage and improve their health and wellbeing.

Occupational health and safety (OHS) management system and risk

OHSAS 18001: 2007 and ISO 45001

Occupational Health and Safety
Assessment Series 18001:2007 (OHSAS)
has been the assessment specification
for the Welsh Water occupational health
& safety management system for many
years. 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 has used 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 covered:

- The operation, maintenance, contract management and management of potable and wastewater 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.

We have held annual reviews of the effectiveness of our OHS management system and the business has used this review as another opportunity to identify and drive continual improvement.

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

OHSAS 18001 is a British Standard that is being replaced by the new International Standard for Occupational Health and Safety Management Systems ISO 45001:2018. Organizations which are certified to BS OHSAS 18001 have until March 2021 to migrate to ISO 45001 if they wish to retain a recognized certification.

To support our transition to the new standard members of the Health and Safety, IMS and Business Assurance teams completed formal training in ISO45001 during 2018. A transition plan was developed and audited internally prior to a successful external assessment that resulted in certification against ISO 45001 being awarded in November 2019.

ISO 45001 encourages the incorporation of health and safety into the broader management system of an organisation. Senior management are expected to take a stronger top-down leadership role, driving performance improvements into action and taking responsibility for the protection of their employees. Health and safety responsibility and engagement should be embedded as widely as possible with all employees understanding how they can support and contribute to a culture of health and safety. Health and safety should be seamlessly part of 'business as usual', with everyone being aware of the objectives and advantages of a safe and efficient workplace and empowered to contribute to it. The standard is also intended to encourage increased 'riskbased thinking' with a more proactive, flexible and preventative approach based on remedying a broader range of risks before they materialise.

How we monitor and manage OHS risk

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

Our 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 reports.

Illness and absence records are maintained by Welsh Water and contract partner Human Resources departments. These records allow us to identify the causes and monitor the 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

Every role in the business has had the key health and safety knowledge and experience needed for the role mapped out and any mandatory training is identified in our HR systems. Training and development needs are reviewed annually. Courses are practical with face to face training and assessment.

We monitor health and safety training completion of key courses as a leading indicator in our management and quarterly Board reports.

Competence checks are carried out on key activities and employees are 'signed off' as fit to carry out tasks on their Personal Work Plans.

We have continued to develop and deliver a range of bespoke 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 2019 have included: accident and incident investigation, attendance management, positive mental health and wellbeing, COSHH assessment and contractor management.

There is a passport scheme for contactors working on our potable supply pipes that is being extended into our Capital contracts. In addition, we deliver bespoke corporate induction health and safety sessions for new employees, apprentices and graduates.

Promoting good practice

The following illustrates some actions taken in 2019-20 to mitigate OHS risk and raise awareness:

Dwr Cymru Executive (DCE) health and safety days:

Over the last 12 months we have held several company-wide DCE health and safety days. Executive directors and senior managers have quarterly objectives to conduct site and team health and safety visits and report back on their conversations. These days have focussed on our STEP safety culture and behaviours, manual handling and back care, mental and physical health and wellbeing, winter preparations, safe driving and slips, trips and falls. Managers have held team briefing sessions and DCE members have participated in health and safety conversations and visits to sites. Operational, Retail and Capital teams have also carried out some targeted health and safety events during the year to focus on specific topics relevant to their activities. These have included reminders about how to 'Take 5' and have effective health and safety conversations, good contractor management practices and sharing learning from incidents.

STEP (Safety Takes Every Person) safety culture programme:

We have actively encouraged everyone to have regular health and safety 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 Board quarterly health and safety performance reports.

This has been supported by a STEP safety culture training and awareness programme. Delivery commenced in January 2014 and 877 managers and supervisors have attended these training sessions. It has been supported by workshops and briefings led by the health and appointed STEP Champions ensure that the training principles are being used locally.

We have over 150 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. This programme was extended to all other support functions and refresher sessions were delivered to line managers during 2019.

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 323 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. In 2019 they produced a guide for safe cover lifting and a series of short films covering different manual handling activities. These will be reinforced during our 2020 awareness campaigns.

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. We are members of the South Wales Responsible Care Cell and seek to learn from those in the chemical industry. We have a Welsh Water Process Safety Group, have participated in a Water Industry process safety group and delivered Cogent Skills training course for selected Directors and Heads of Service in Process Safety Leadership. The Process Safety Group are coordinating all our process safety improvement activities. They have developed a toolbox talks for operatives and arranged a bespoke course on 'Managing Major Hazards' for selected operational managers and supervisors. We hold quarterly process safety forums to share learning from incidents and develop best practice. This includes reviewing our fire and explosion, toxic gas and digester safety risks and management controls for new and existing assets.

Major risk reviews:

We have identified the 'Top 10' health and safety risks associated with our activities. These are those risks that have a low probability, but a high severity, should they arise. A rolling programme of major risk assurance reviews has been built into our AMP6 health and safety improvement plans. During 2019-20 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 asbestos and identify any improvements. We have also reviewed our arrangements for managing risks from moving plant and vehicles.

Covid-19 Risks:

In March 2020 a new risk emerged due to the emergence of a new Coronavirus that has rapidly spread across the world. We quickly responded to this by putting in place arrangements for most colleagues to continue working safely from home, while protecting key workers in operational roles. This has included developing new ways of working, based on risk assessments and continually reviewing and updating these as new external guidance has been published. Occupational exposure to Covid -19 is now classed as a disease under the Reporting of Injuries and Dangerous Occurrences Regulations.

Lone working risk management:

We reviewed and improved our arrangements for managing lone working risks. This included the trial and subsequent introduction of new lone working devices for over 850 operational colleagues.

These units with an externally hosted alarm management centre include emergency panic buttons, no motion detectors and the ability for remote monitoring and rapid response in the case of an incident.

Employee Engagement and HSL Climate Surveys:

The results of our 2019 annual employee engagement survey showed that 96% of all our employees were clear what was expected of them regarding health and safety and 92% believed that health and safety is taken seriously at Welsh Water.

In addition, employees scored us 79% for promoting good health and wellbeing.

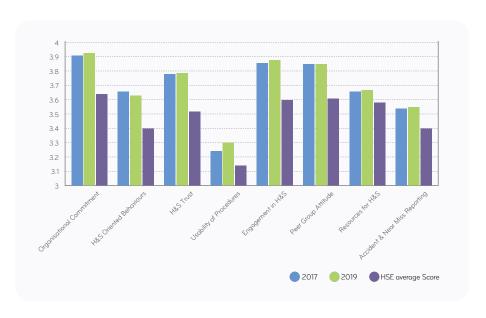
In February 2019 we carried out our second health and safety climate survey. 74% of all employees responded and we scored above the HSE average scores for all the different aspects of health and safety management. Each team has used this information to identify areas for further improvement and put in place local action plans.

The Health, Safety and Wellbeing Steering Group have been monitoring progress against these and the survey will be repeated in 2021.

Safety alerts and bulletins:

Many health and safety alerts, bulletins and briefings were also issued by the Health and Safety Team during the year. These have covered issues from equipment failures to 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 have also originated from other internal and external sources, including our contract partners, other water companies and the Health and Safety Executive (HSE).

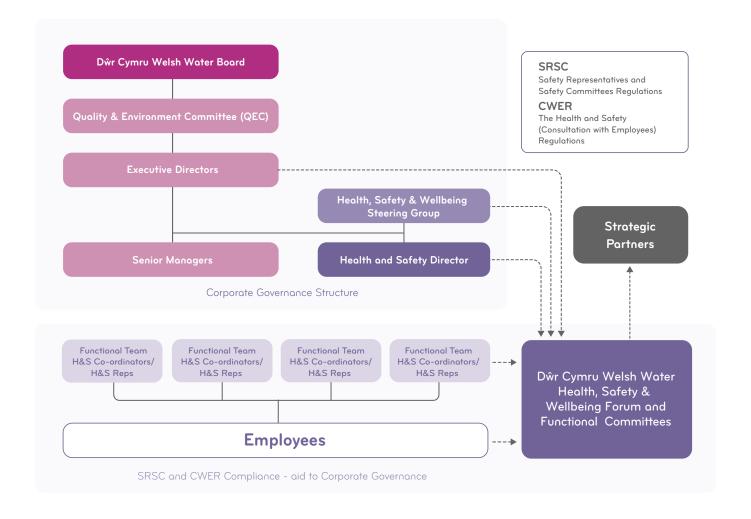


Governance

Welsh Water has had in place an OHSAS 18001 accredited safety management system that defined the processes, policies, legal framework and structures that we have established to manage all aspects of our operation. It provided a governance framework by setting out the responsibilities for the management of health and safety, and ensured we remained focused on the accountability of individuals and teams within the business. It used both reporting structures and formal management systems to identify and control any operational or other business risks.

This management system has been subject to audit every six months by an external accreditation body. In addition, Welsh Water has established a programme of internal audits, which are designed to identify any opportunities for improvement. As part of these improvements in November 2019 our accreditation was successfully migrated to the new ISO 45001 Health and Safety Management standard.

Our arrangements to review our health, safety and wellbeing performance are described in the Organisational Structure chart:



Board and Executive review of performance:

A health and safety Monthly
Management Report is produced for
the Executive and Board. Alongside
this, more in-depth quarterly reports
are presented to the Board Quality
and Environment Committee (QEC)
meetings for their review. In addition
to performance, this report addresses
key issues of health, safety and
wellbeing policies and procedures,
training and regulatory engagement
and communication. The Board also
reviews and reviews the annual health
and safety report before it is published
at the annual general meeting.

During 2019, Welsh Water Board and Executive team members completed the new National Examination Board in Occupational Safety and Health (NEBOSH) HSE Certificate in Health and Safety Leadership Excellence. This enabled them as individuals to reflect on and to further develop their personal health and safety competence and leadership.

Health, safety and wellbeing steering group:

Monitoring and review of overall health and safety performance and progress against improvement initiatives has been undertaken during quarterly meetings chaired by the Board Director responsible for health and safety.

This group was established in April 2011 and has ensured that business focus is kept on improving health, safety and wellbeing. They have reviewed performance, learning from incidents, and analysed the outputs of improvement projects and internal reviews. This has included the findings from internal and external audits and emergency exercises.

Health, safety and wellbeing 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 Board Director responsible for health and safety, the forum is aligned to the Health and Safety Steering Group, which approves priorities and, where required, the release of resources. This group also carries out site and team visits engaging with colleagues to better understand how health and safety arrangements are working in practice and seek feedback.

Local management information:

A monthly health and safety performance dashboard is produced for use by teams and is displayed on site notice boards. Managers have direct access to their team's incident reports and can also track progress on safety conversations, positive interventions and audits via electronic dashboards. There are also operational leadership team specific reports that are cascaded through line management to support performance monitoring and management locally.

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 is one part of 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 contractor performance:

Performance monitoring will involve both pro-active and re-active monitoring arrangements. This information is discussed at routine contract review meetings. Any recommended improvements identified during contract performance reviews are based upon a joint assessment of the risks and can include both quantitative and qualitative targets. Any partner improvement action plans are reviewed and updated on a regular basis.

Contract partner health and safety forums:

Monitoring and review of contractor health and safety performance is also undertaken during regular meetings between Welsh Water's Health and Safety Managers and the 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 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 used these forums to develop joint standards and we have held seminars and workshops on key areas of risk.

Auditing performance

Internal and cross partner audits:

Welsh Water has previously hosted programmes of cross partner and safety management system audits, where main contract 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 has been a process to facilitate this practice during AMP6 which has continued to evolve as we have delivered our improvement plans. In 2019 the Capital Alliance have developed a new contract partner health and safety control framework. Partners are self-reporting against the standards within this and it will be reviewed by the use of targeted audits during 2020.

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.

ADR (Carriage of Dangerous Goods by Road) Inspections:

During 2019/20 Welsh Water were audited on our compliance with the ADR legislation. This included visits to 4 operational sites across Wales to cover all geographic areas. However, due to the onset of COVID-19 following commencement of the audit process, visits to the North Wales sites were cancelled in line with Government guidance and travel restrictions.



Audits of the remaining sites are being rescheduled for later in 2020 when the pandemic restrictions are lifted. The completed audits indicated that we continue to operate to a good standard of compliance whilst undertaking and managing the Carriage of Dangerous Goods as well as identifying some future improvement opportunities.

Roadmaps and unit assessments - continuous improvement action plans

There is a team specific 'unit assessment' process. This identifies the health and safety risks and management controls that should be in place for each team. The unit assessments cover a 3-year period and are reviewed regularly to ensure that team procedural briefings are delivered and that risk controls are in place.

Progress against unit assessment targets is included in management health and safety performance reports. We are reviewing the effectiveness of this process and working with users to develop our health and safety monitoring and improvement tools.

Industry reporting

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. This annual report is shared with our members and published on our website for all stakeholders to access.

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 and we continue to share best practice with others.

Recognising excellence and achievements

Health & safety conference

In June 2019 Welsh Water held our thirteenth annual health and safety conference. This year the event was held at Venue Cymru in Llandudno. Over 300 individuals, including executive and non-executive directors, senior managers, safety representatives, contractors and colleagues from across the business attended the event, which was sponsored by our insurers RSA.

The theme for the event was 'Go Home Healthy' 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 presenter was Scott Heffield. Drawing on his experiences as a Royal Marine commando, police officer, and more recently his role supporting Bear Grylls' television projects, Scott underlined the danger of complacency over health and safety particularly in changing environments.

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

- Water Safety The Royal Life Saving Society
- Back Health Clyde Crawford, Caer Health Management
- The Trouble With Men: Men's Health – Prostate Cymru
- Safety Culture and Behaviours –
 The Welsh Water Capital Alliance
- The Chase: Transport Edition The Welsh Water Transport Team

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 and the finalists in each category are shared with the delegates voting the winners on the day.

The Welsh Water Team Health and Safety Award winners were Wastewater Networks. They identified a confined spaces risk to operatives cleaning cello monitors in sewers. They created a bespoke cleaning tool that could be used from outside the chamber preventing any need to access the sewer.

The Capital Health and Safety Award winners were the team who safely delivered the replacement of the pipework underneath Talybont Reservoir.

This was a very complex construction task involving work underwater and in confined spaces to refurbish this pipework and involved developing new industry leading innovative approaches to manage the risks.

The Operational Contractor Health and Safety Award winners were Technocover. They recognised a risk of Hand Arm Vibration (HAVs) from their work activities and worked with their employees to develop new controls to address this. As a result, the Health and Safety Executive invited them to participate in a seminar at Wrexham University that was attended by 45 small companies from the North Wales business community to raise awareness of HAVs.

The Health and Wellbeing Award went to Aqualogic for their 'Safe and Sound' mobile feedback tool. This was introduced as part of their health and wellbeing improvement programme so that employees can share how they are feeling at the end of each day and managers can have conversations with them about their health and wellbeing.







The Outstanding Contribution Award went to Cliff Williams who has worked for Welsh Water for 36 years. The submission demonstrated how he continuously strives to improve the way the team works, with safety at the forefront of everything he does.

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 2019 and were awarded Gold status for the third 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 2019 RoSPA Gold Awards for their health and safety performance and improvement initiatives.

In May 2019 Welsh Water were awarded the Swansea and West Wales Occupational Safety Group

Large Organization Health and Safety Shield. Cliff Williams, Customer Service Inspector was also a runner up for the H&S Employee of the Year. Welsh Water sponsored a new award at this event - the Safety Shield for Micro Businesses. This award recognizes good health and safety practices in the smaller employers in Wales and was won by Qualitek Engineering.

We also received a Commended Certificate having got through to the second stage of the 2019 Safety Groups UK Innovation Awards.

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 2019 Lewis Civil Engineering, Bridges Ltd, O'Connor Utilities Ltd, ACIEM Group, Skanska.
- RoSPA President's Occupational Health
 & Safety Award 2019 Skanska
- RoSPA Construction Commercial Industry Sector Award 2019 -Morrison Utility Services
- FORS Bronze Award 2019 Lewis Civil Engineering, O'Connor Utilities Ltd
- Considerate Constructors Scheme
 Award Skanska (Ultra Site of the Year)
- The Building Safety Group Member of the Year Award - ACIEM Group
- British Safety Council International Safety Award – Morrison Utility Services (Distinction)
- Street Works UK Awards 2019 Morrison Utility Services
- Utility Week Awards 2019 Health, Safety and Wellbeing Awards – Morrison Utility Services for their suicide awareness and wellbeing programme that was delivered in partnership with Welsh Water.





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 26 years, she has just completed 6 years as an IOSH Council member. The IOSH 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 their role as a Council Member they chaired a workshop at the 2-day IOSH 2019 H&S conference in Birmingham. The event was attended by 725 health and safety professionals from across the world. The event included 44 presentations with Martin Temple, Chair of HSE who delivered the keynote session.

Over the last 5 years Welsh Water have supported the Health and Safety Executive 'Helping Great Britain Work Well' strategy. This has included hosting their Welsh strategy launch, submitting case studies for the HSE website and events and presenting at several HSE conferences.

In April 2019 Peter Perry, our Managing Director delivered a presentation on driving up health and safety in the supply chain at South Wales Safety Groups Alliance Annual H&S Conference and Exhibition at the Liberty Stadium. This event was hosted by Sian Clayton, HSE Head of Field Operations Wales and the Marches and the keynote speaker was Martin Temple, HSE Board Chair. 200 delegates attended from small and large companies across Wales.

In November 2019 Craig Hill, Senior Health and Safety Adviser gave a presentation on our approach to health and safety management at the South and West Wales Safety Group.

We have also been sharing our approach to health and wellbeing, specifically our journey to attain the Wales Platinum Corporate Health Standard. We have held meetings with and delivered presentations to Natural Resources Wales to support them in their improvement programmes. In addition, Karen Rogers, Health and Safety Manager and Meryl Soper, Head of Organization Effectiveness gave a presentation on our approach to managing mental health at the Senedd Insight – Mental Health in the Workplace conference in Cardiff on 29th October.

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. It has included presentations at educational establishments alongside some hard-hitting films that have been shared on social media and with other water companies.





Members of the H&S team out on site visits for Safety Day.



