



Queen Elizabeth Olympic Park – Health and Safety Policy FINAL

October 2019

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Approvals

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1. Executive Summary

- 1.1 Health and Safety is a key tenet of how LLDC undertakes its business. LLDC is a multifaceted business and our strategic approach is to ensure the Health and Safety of our staff, contractors and visitors.
- 1.2 The Health and Safety Policy together and associated procedures and processes support the London Legacy Development Corporations (LLDC) aims and objectives. The Policy supports the strategic and operational management of LLDC, its assets, venues, developments and all other activities. The H&S Policy commits LLDC to continually improving the health and safety of those that live, work and visit LLDC estate. We aim to deliver
- A robust health and safety culture across LLDC.
 - A safe and healthy environment for all that live, work and visit within the areas of LLDC's responsibility.
 - Efficient, proactive and pragmatic ways of delivering health and safety
- 1.3 The H&S Cycle below describes our approach to health and safety. They also form the basis of the two-occupational health and safety management systems of OHSAS 18001 (being replaced with ISO 45001) and ILO-OSH 2001.



- 1.4 This Policy is designed to ensure that all aspects of health and safety are fully integrated into the management of LLDC, its operations, venues, developments and contractors so *“enabling”* a proactive Health and Safety Culture through the principles of best practice risk management.

2. Health and Safety Policy

- 2.1 London Legacy Development Corporation (LLDC) has adopted the highest Health and Safety standards and takes all reasonable steps in relation to the health, safety and welfare of those that live, work and visit its estate, and areas of responsibility.
- 2.2 LLDC is committed to promoting high standards of Health and Safety in the delivery of the LLDC's services and activities.
- 2.3 LLDC will pursue best-practice, and be fully compliant with applicable UK and European legislation and standards. Legal standards are the minimum acceptable, where possible these will be exceeded.
- 2.4 Our vision, so far as is reasonably practicable, is to go beyond eliminating preventable illnesses, injuries and business losses due to unplanned events in and on our premises, within our projects, on our other sites and within our area of responsibility as the Planning Authority. This includes leading and working with all our stakeholders to improve the well-being of all involved in the work of LLDC, encouraging inclusion, health and well-being.
- 2.5 Health and safety will always be given the highest priority by systematically identifying, assessing and managing risks, monitoring performance against targets and publishing the results. Performance will be subject to regular review by the Health, Safety and Security Committee and Executive Management Team. We are dedicated to continual improvement through learning from our own experience, from the expertise of our partners and suppliers and wider bench-marking, and learning.
- 2.6 LLDC will use its HS&S committee, employee communication and consultation arrangements to discuss health and safety matters and help LLDC achieve its goals and objectives, and to monitor and review progress made in meeting the performance standards.
- 2.7 We shall engage with all staff, partners, operators, developers and suppliers so that everyone is enthusiastically involved in effectively managing risk and acting as an ambassador for our realistic and practical vision. We shall continue to engage with the workforce of our suppliers, recognise trade unions and their appointed safety representatives where applicable, and forge partnerships to deliver our highest standards.
- 2.8 The LLDC will, for its employees, manage risk to their health and safety, provide safe workplaces and safe systems of work, and provide adequate information, instruction, training and line management.
- 2.9 Whilst overall policy responsibility rests at the highest management level, everyone throughout LLDC, its suppliers, stakeholders and operators is expected and required to accept a degree of responsibility for carrying out the policy.
- 2.10 LLDC will engage with all its stakeholders to seek their views and their involvement in the development, implementation, managing and monitoring of the LLDC's Health and Safety Policy.
- 2.11 This Policy will be reviewed annually, and amended as appropriate.

Signed

Lyn Garner Chief Executive Officer

Date 26/11/19

3. Purpose and Aims

- 3.1** LLDC recognises its responsibility to the health, safety and wellbeing (supporting and promoting) the welfare of those coming into contact with our organisation.
- 3.2** The purpose of London Legacy Development Corporations Health and Safety policy is to ensure, as far as is reasonably practicable, every person encountering the organisation and its activities are safe and protected from harm. This means we will always work to:
- Ensure an efficient, proactive and pragmatic approach towards delivery of health and safety across the various areas of responsibility.
 - Create and maintain a safe, healthy and free from harm environment for all that live, work and visit within the areas of responsibility of LLDC in collaboration with all partners and stakeholders.
 - Install a robust health and safety culture across LLDC.
 - Promote and improve health, safety and wellbeing within LLDC and areas of activity.
 - Provide a forum for individuals and organisations involved with health, safety and wellbeing within the boundaries of LLDC, to facilitate the exchange and sharing of information, experience and expertise.
- 3.3** This policy gives clear direction to staff, volunteers, stakeholders and those providing services about expected behaviour, culture and responsibilities to safeguard and promote the health, safety and welfare of all persons.
- 3.4** LLDC is committed to ensuring that all people management policies, and their application, are free from any form of discrimination on the grounds of: race, pregnancy and being a parent, disability, gender, gender identity, religion/belief, age, sexual orientation, or any other personal characteristics.

4. Legislation and Statutory Guidance

4.1 This policy is based on and informed by statutory guidance and legislation;

- **Health and Safety at Work Act 1974**
- **Management of Health and Safety at Work Regulations 1999** including schedule 1 the principles of prevention
- **Fire Precautions (workplace) Regulations 1997**
- **Construction (Design and Management) Regulations 2015**
- **Occupiers Liability Act 1984**
- **Corporate Manslaughter and Corporate Homicide Act 2007**
- HSG 65 Managing for Health and Safety
- Guide to Safety at Sports Grounds (sixth edition)
- **Workplace (Health, Safety and Welfare) Regulations 1992**
- The Purple Guide to Health, safety and welfare at music and other events

4.2 The above list is not exhaustive and further guidance and legislation that informs this policy can be found at <http://www.hse.gov.uk/legislation/>.

5. Roles, Responsibilities, Reporting and Risk

5.1 The **Health and Safety at Work Act 1974** and **The Management of Health and Safety at Work Regulations 1999** requires that the LLDC Health and Safety policy is underpinned by appropriate “organisation and arrangements” to enable its implementation. These include clearly defining responsibilities in these regards, especially for those with unique responsibilities.

5.2 List of responsible persons;

- Chief Executive Officer
- Board
- Health Safety and Security Committee
- Executive Director Park Operations and Venues
- Directors
- Head of Security and Safety
- Security Manager
- All Employees
- Other Parties

Groups / post holders’ roles and responsibilities are below;

5.3 **Chief Executive Officer**

5.3.1 The CEO has overall and final responsibility for Health and Safety. Specific H&S duties include:

- An organisation that has clearly defined responsibilities that lead to effective and comprehensive H&S management.
- Allocation of resources to comply with H&S legislation and best practice as far as is reasonably practicable.
- Ensuring that systems are in place so that all employees are fully aware of their statutory responsibilities by the inclusion of Health and Safety in all inductions and job descriptions.
- Ensure that competent health and safety advice is available to the Board, Executive Management and those responsible for Health and Safety. And that generally the health and safety function is adequately resourced and staff are developed and supported to discharge their duties effectively.
- Reviewing the health and safety performance of the corporation through annual reports and ensuring appropriate action plans are developed to facilitate a culture of continuous improvement.
- Encourage co-operation, consultation and participation in health and safety by employees at all levels with the assistance of HR, Security and Safety, Safety Advisors and with the supply chain, partners and the wider community through the relevant directories and stakeholders.

5.4 **Board**

5.4.1 Managing Health and Safety risk and providing effective governance arrangements is a key issue for the Board, who have a collective role in providing committed leadership in the continuous improvement in H&S:

- Responsible for committing resources as an investment to improve health, safety and welfare and subsequently monitoring the impact of committing resources.
- Board decisions and actions will support LLDC’s Health and Safety responsibilities.
- They will appoint a suitable skilled, and knowledgeable Board member as chair of the Health, Safety and Security committee.

5.5 **Health, Safety and Security Committee**

5.5.1 The HSS Committee has delegated responsibility from the Board of Directors for:

- Ensuring there are adequate H&S risk management arrangements in operation across LLDC’s activities.
- Reviewing and approving Health and Safety Policies and Procedures.
- Monitoring compliance and performance.

- Promoting a positive Health and Safety culture throughout LLDC and its activity areas.

5.6 Executive Director Park, Operations and Venues

5.6.1 The Executive Director POV has executive responsibility;

- Ensuring appropriate and relevant performance targets are met and monitored.
- Taking corrective actions identified through incident investigations.
- Ensuring implementation and monitoring of Health and Safety policies across the corporation.
- Ensuring risk assessments are undertaken, appropriate action taken and results are recorded.
- Ensuring that staff have access to adequate information, instruction, training and supervision to undertake work safely.
- Promoting a positive Health and Safety Culture across the corporation.
- Ensuring that all accidents/incidents are managed in accordance with relevant policies and procedures.
- Ensuring that policies and procedures are in place to facilitate safe workplaces and safe systems of work.
- Ensuring the corporations H&S policy is monitored and reviewed.
- Reports to the HSSC, CEO and Board showing health and safety performance across the corporation.

5.7 Director of Human Resources

5.7.1 The Director of Human Resources is responsible for;

- Providing an annual report to the Health and Safety Committee on HR management data related to staff wellbeing, including analysis of sickness absence, referrals to Occupational Health service, referrals to the employees assistance line for counselling.
- Ensuring that guidance and advice provided by HR incorporates health and safety considerations such as:
- Reflecting relevant health and safety responsibilities in job descriptions and person specifications;
- Performance and appraisal procedures to include reference to health and safety competencies; and
- Ensuring that staff have access to sufficient Occupational health provision and advice.
- Ensure that an identified minimum number of LLDC employees are first aid and fire awareness and warden trained.

5.8 All other directors

5.8.1 All directors are responsible for;

- Implementing the corporation's policies and procedures within their directorate and area of responsibility.
- Taking appropriate corrective actions identified through incident investigations.
- Identifying directorate health and safety champions.
- Ensuring risk assessments are undertaken for their areas of responsibility, appropriate action is taken to mitigate risks and results are recorded.
- Ensuring that all staff have access to and have received necessary health and safety information, instruction, equipment and training to undertake their work safely.
- Promoting a positive health and safety culture.
- Ensuring incident and accident data is reported to the EDPOV and HSSC.
- Ensuring that all accidents and incidents within their areas of responsibility are managed in accordance with relevant policies and procedures

5.9 Head of Security and Safety

5.9.1 The Head of Security and Safety is responsible for;

- Health and safety staff are appointed under the provisions of regulation 7 of the Management of Health and Safety at Work Regulations 1999, which requires LLDC to appoint one or more competent persons to advise and assist them with measures to comply with health and safety legislation.
- Providing and gaining advice on strategic, tactical and operational health and safety issues and developing and recommending policies, procedures and compliance strategies in line with best practice to ensure that LLDC complies with its obligations under health and safety legislation.
- Reviewing and updating arrangements for implementing the Health and Safety Policy, including monitoring compliance with the requirements for local safety policies and maintaining a central database of policy statements as they refer to activity areas.
- Providing advice and support to LLDC on day-to-day health and safety issues, assisting with the production and review of risk assessments, inspections and accident investigation.
- Liaising with external/contracted out Health and Safety advisors to LLDC and its activities, the Health and Safety Executive, the London Fire and Emergency Planning Authority and other relevant organisations on matters relation to health and safety.

5.10 All Employees

5.10.1 All employees, regardless of their position within LLDC, have the following legal responsibilities under 'The Health and Safety at Work etc. Act 1974' and 'The Management of Health and Safety at Work Regulations 1999':

- To take reasonable care for the safety of themselves and others at work who may be affected by their acts or omissions;
- To co-operate with their employer and others in fulfilling statutory responsibilities;
- To notify their employer immediately of any situation which they have reason to believe might present a serious and imminent danger to their own or others' safety.
- Provide all contractors with relevant information relating to LLDC health and safety procedures.
- To notify their employer of any shortcomings or perceived shortcomings in their health and safety arrangements, even when no immediate danger exists, so that appropriate remedial action can be taken (this will be done by notifying their line manager, other safety managers or the LLDC Security and safety team.

5.11 Suppliers or Contractors

5.11.1 LLDC employs a large number of suppliers and contractors engaged in a wide variety of tasks ranging from building maintenance and cleaning to training, consultancy and construction. All Contractors will;

- All contractors must adhere to LLDC health and safety procedures and ensure that their activities do not place those that live work and visit the LLDC estate at risk.
- Act in accordance with LLDC guidance, policies, common standards and any other appropriate process or policy with respect to the management of their health and safety.

5.12 Competent Advice Avenues

5.12.1 There are several avenues open to LLDC where external or internal advice can be gained – (internal) LLDC Security and Safety Team, (External) includes Park Health and Safety Services, MACE construction, ENGIE FM Services, Event Safety Services. The starting point for enquiries will start with LLDC Safety and Security.

5.13 Governance and Reporting Lines

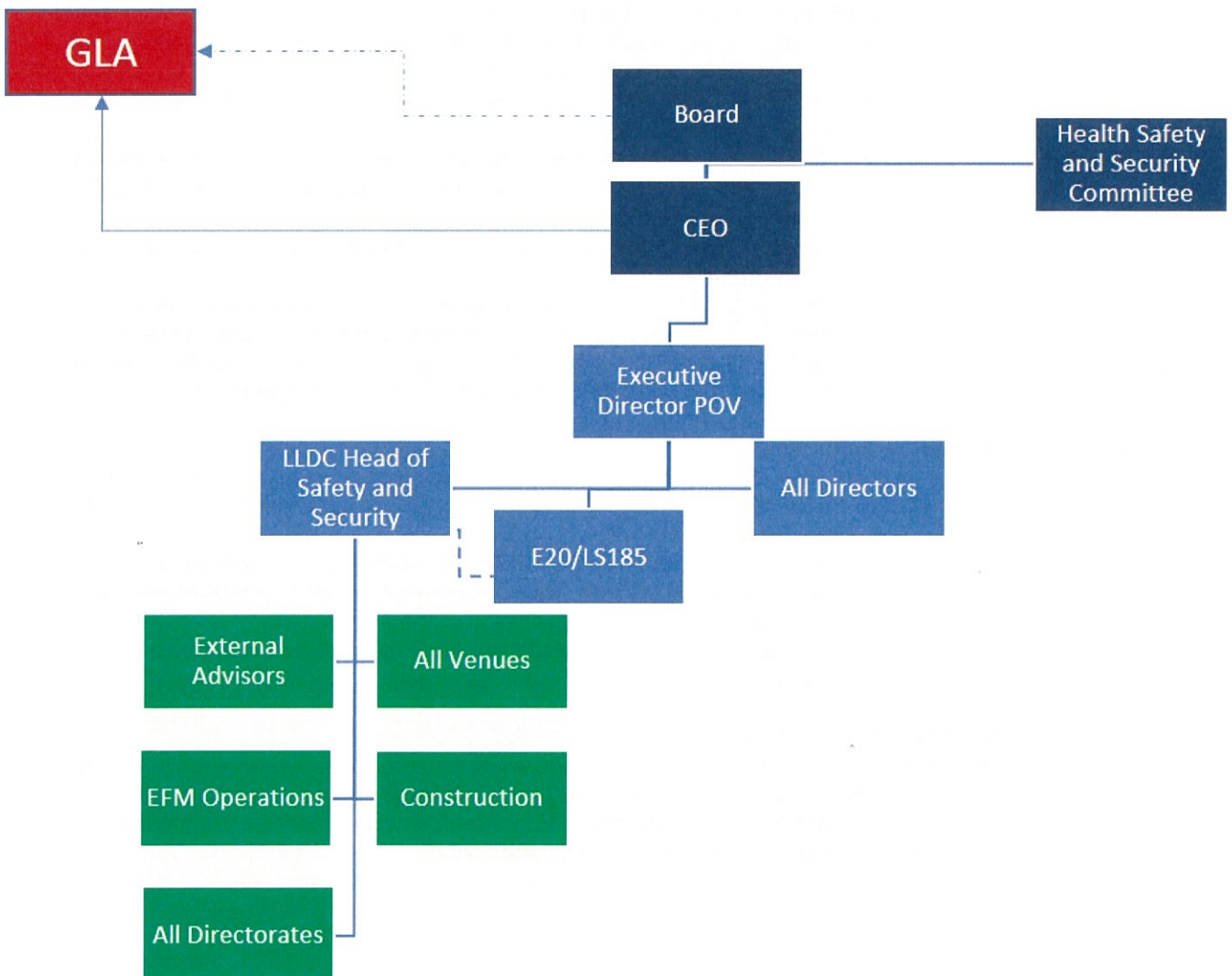
5.13.1 To ensure that Health and Safety within LLDC and its areas of activity is governed in the correct way and have an element of LLDC oversight, each area is to report in to the relevant lines in the below flow chart (fig1).

5.13.2 This supports the control of risks through coordinated action across all areas of activity, having the ability to react to changing demands and maintaining a positive health and safety culture.

5.13.3 To support this, we have documented health and safety standards and procedures for;

- LLDC Construction
- Intrusive works
- Construction Management Group
- Legacy Community Schemes
- Park, Operations and Venues
- Corporate and Community engagement

Fig1



5.14 Risk Assessments

- 5.14.1** LLDC adopts the nine general principles of prevention in each of the areas above as outlined by The Management of Health and Safety at Work Regulations 1999 (Reg 4) there is also a clear expectation that all contractors and other parties apply this to their areas of responsibility. These principles underpin our Health and Safety policy and culture across all activities.
- 5.14.2** LLDC has clear expectations on risk assessments in that all activities and areas are to have risk assessments undertaken by competent persons which are to be task/area specific and not generic in nature.
- 5.14.3** They must capture all relevant risks on a 5 by 5 risk matrix as a minimum that gives a risk rating, existing mitigation, further mitigation and a residual risk rating together with assigning accountability.
- 5.14.4** Method statements must be specific for the task at hand that describes the sequence of the operations for safe working that will be undertaken to ensure the health and safety for the life of the works. This is directly linked to the risk assessment.
- 5.14.5** Under the Management of Health and Safety at Work Regulations 1999 (reg3) all employers shall make a suitable and sufficient assessment of—
- i. The risks to the health and safety of his employees to which they are exposed whilst they are at work; and
 - ii. The risks to the health and safety of persons not in his employment arising out of or in connection with the conduct by him of his undertaking,
- 5.14.6** These are to be reflected within the Safe Systems of works, method statements and workforce briefings and toolbox talks.

6. LLDC Activity Areas

6.1 Construction

6.1.1 LLDC commissions construction or partners with other organisations which then engage in construction within the Park, in some cases there are Client liabilities and duties (under the CDM Regulations), although these do not apply where partners are identified under the contracts as “client”, and in all cases, there is a reputational risk as LLDC and the Park are seen as a single, responsible entity.

6.2 Park, Operations and Venues

6.2.1 LLDC is responsible via Park Operations and Venues (POV) for the ongoing management, maintenance and operation of the parklands and public realm spaces, its attractions and venues, along with the host of activities undertaken within the areas under control of LLDC and its supply chain.

6.2.2 POV also manages a portfolio of property via its supply chain that are classed as off park assets.

6.2.3 Venues are under operator agreements whilst LLDC maintains oversight as the asset owner and landlord.

6.2.4 Engie FM support LLDC with monitoring and controlling activities through a Health and Safety Manager.

6.3 Events and Community Engagement

6.3.1 LLDC undertake a range of activities encouraging regeneration of the local area, local activities and contracts companies for putting on major and minor events in the public realm and interim use spaces.

6.3.2 LLDC host many major events in the public realm areas, these are run by private organisations with oversight from POV on all aspects of service delivery including safety.

6.4 London Stadium

6.4.1 London Stadium hosts many major and minor events across the year, these have significant impact and cover a range of Health Safety and Wellbeing areas, including Spectator Safety as identified under the Guide to Safety at Sports Grounds - as a parent organisation LLDC has responsibility for London Stadium, its events and ensuring that it follows the necessary processes.

6.5 Corporate Areas

6.4.1 LLDC have a range of functions within its corporate areas; Communications, Marketing and Strategy; Planning, Policy and Decisions Team; Finance and Corporate Services; Community and Regeneration; Development; Park Operations and Venues; E20 LLP, London Stadium 185. These work to support the areas set out above.

7. Risk Areas

7.1 Employee Safety

7.1.1 LLDC employees carry out their functions through a range of different areas with safety matters ranging from display screen working to the external community engaging work that potentially puts people at risk of violence and aggression through to event safety, the areas are;

- Office environment
- Public space
- Parklands
- Waterways
- Construction
- Maintenance
- Lone working
- Home /remote working
- Events.

7.2 Public Safety

7.2.1 All aspects of LLDC activities have the potential for impacting upon those that work, live and visit within its activity areas together with neighbours of the properties we own and manage, the largest which is affected is a major group “the public” to whom there is a duty of care owed in all the undertakings done either by the organisation; on its behalf or under its authority. We have external H&S professional advice available if required and management ownership to address any risks.

7.2.2 Engie FM support LLDC with this element through the contract Health and Safety Manager who feeds into the LLDC Safety and Security Team.

7.3 Construction Safety

7.3.1 Construction works both temporary and permanent undertaken within LLDC estate boundary fall within this policy. Current sites include; East Bank, Eastwick and Sweetwater, specified infrastructure works (SIW), UCLE and Chobham Manor. LLDC will form part of their project safety teams for safety tours and reporting lines for incidents and statistical data.

7.3.2 Construction outside of the LLDC estate but still within its remit as part of the planning boundaries fall partly within this policy, whilst items inside the sites are not under its (LLDC) jurisdiction, items that affect those outside in relation to construction transport, site hoardings and boundaries, impacts on local residents and environmental issues, will be reported on and enforced via planning authority and relevant forums LLDC chair.

7.3.3 LLDC Park Operations and Venues engages in construction activities associated with its property portfolio, in occupied buildings, through general maintenance and new projects.

7.4 Event Safety

7.4.1 Events of every size fall within this policy for those held in park and public realm and those within venues and attractions. Current existing sites are north and south park and public realm areas, private road network, London Aquatics Centre, Copper Box Arena, London Stadium, Timber Lodge, The Last Drop, ArcelorMittal Orbit, Waterways areas and pontoons.

7.4.2 LLDC forms part of the safety review team and process. Where events are happening in PPR areas LLDC will have a more hands/monitoring approach, whilst items inside of venues site under the venue management teams/operators, LLDC are the asset owners and all events have an impact on the park and public realm areas and will involve an element of build and break that LLDC will maintain oversight on.

- 7.4.3** LLDC will see all event management plans, stewarding plans, safety management plans and all other plans that encompass the events safety.
- 7.4.4** LLDC will form part of the event safety team (if required) for safety tours, incident reporting and statistical data.

8. Performance Measurement, Monitoring and Review Arrangements

8.1 Performance Standards

8.1.1 The Health, Safety and Security Committee will agree appropriate performance standards against which LLDC will measure the effectiveness of its health and safety management system.

8.1.2 Performance standards will cover as a minimum;

- Safety Policy and Policy Statement
- Health and Safety Information and training given to staff, visitors, contractors and those that fall within activity areas.
- Risk Assessments
- Wellbeing and stress management
- Incident and trend analysis

8.2 Monitoring and Review

8.2.1 Pro-active monitoring - The Health and Safety Policy will be reviewed annually by the Head of Security and Safety in conjunction with the Executive Director of Park Operations and the Health, Safety and Security Committee. It will be amended as appropriate and will be supplemented by further policies or procedures as necessary.

8.2.2 Directors Safety Tours on activity areas will be undertaken on a bi-annual basis with key members from the Health, Safety and Security Committee and key health and safety representatives from the activity area having the safety tour.

8.2.3 The Head of Security and Safety and their team will undertake a safety tour within at least one activity area monthly.

8.2.4 The Head of Security and Safety will oversee arrangements for an annual audit via internal and external resources of a sample of activity areas to assess compliance with health and safety policies and procedures.

8.2.5 Re-active monitoring - The monitoring of injuries, ill-health, accidents and incidents data complement pro-active monitoring and will take place to enable identification of causes, lessons learnt, and positively reducing future incidents.

9. Training, Induction and Consultation

9.1 Training

9.1.1 Undertaking training is important for all LLDC staff, suppliers and stakeholders to ensure that everyone can perform their work in the safest manner possible. Training can take different forms and can vary in content and duration based on the risks/duties faced by each team within LLDC. Internal LLDC health and safety training begins at the start of employment with induction and then continues through the duration of employment. All training must consider those that are vulnerable workers; agency or temporary workers and those whose first language is not English. Training must also consider individual and departmental responsibilities and maintaining a good level of competence across safety areas.

9.1.2 The MHSWR 1999 (reg 13) outlines the requirements for capabilities and training.

- Employees are provided with adequate health and safety training, during inductions
- On their being exposed to new or increased risks.
- Upon being transferred or given a change of responsibilities within the LLDC undertakings.
- On the introduction of new work equipment into or a change in respect of work equipment already in use within LLDC.
- On the introduction of new technology into LLDC.
- On the introduction of a new system of work in or a change in respect of a system of work already in use within LLDC.

9.1.3 The training referred to above shall;

- Be repeated periodically where appropriate;
- Be adapted to take account of any new or changed risks to the health and safety of the employees concerned; and
- Take place during working hours.

9.2 Induction

9.2.1 LLDC will provide adequate training and induction to their workforce; contractors; (where required) volunteers and (as required) visitors.

9.2.2 Inductions for employees/contractors/volunteers must occur *before* undertaking active work on or before day one employment. For site visitors, these inductions must be covered prior to going out on site. For office visitors, basic health and safety information must be covered at the beginning of any meeting.

9.3 Consultation

9.3.1 It is a legal requirement to consult and engage with the workforce. It is also important as this supports the positive safety culture at all levels that LLDC sets. LLDC expects its stakeholders, partners, supply chain and others to undertake their duties identified within legislation in relation to this.

9.3.2 Consultation improves relationships; reinforces collaborative working and can help with problem solving. LLDC has adopted this as one of the ways of assessing workplace risks and assists with developing/reviewing safety policies and procedures to:

- Identify health, safety and welfare issues that require improvement.
- Identify good practice in health and safety management and share innovation.
- Share solutions and learning from incidents, observations and near misses.
- Inform staff of changes that may affect the management of health, safety and welfare.
- Consult on methods for measuring performance and KPIs.
- Reinforce senior commitment to health and safety.

9.3.3 This will be delivered through various work streams:

- Regular team reviews of risk assessments, inspections, incidents and near misses.
- Including health and safety as a standing first item on agendas at team/ project meetings.
- Including health and safety representation from all activity areas as part of the HSS Committee, creating working groups within the Forum to deal with issues as and when required.
- Creating health and safety space on intranet, notice boards and internal newsletters.
- Providing health and safety training and risk-specific workshops to address significant risks.
- Providing H&S feedback forms to report good/bad practices witnessed.

9.3.4 This will be documented through meeting minutes; Health, safety and security committee minutes; training records and reports.

9.4 Whistleblowing

- a) We believe that everybody who attends the estate has the right to be in a safe and positive environment.
- b) The London Legacy Development Corporation aims to promote and pursue high standards of employment practices and encourage a climate and culture of openness in the workplace. Our whistle blowing policy aims to ensure that all staff and volunteers can report any issues which they believe need to be brought to the attention of the management without fear of reprisal.
- c) A disclosure, will be protected and Confidentiality will be maintained wherever possible. The individual raising the concern will not suffer any detrimental treatment and will be supported as much as possible. For further guidance on whistleblowing you can refer to the LLDC policy.

10. Other Documentation

10.1 Relevant documentation

- Intrusive Works Policy
- Contractor Access Permit Process
- Park Evacuation Plan
- Incident Management Plan
- Crisis Management Plan
- HS&E Common Standards