


<b>Millbank Holdings Group Ltd</b> (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h1 style="color: #008080;">Behaviour Based Safety</h1>	MRSOP010/01/0419
		Last Reviewed: 04/2023
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		Owner: David Hopley

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Purpose:	<p>It is MDA Rail policy to engage with its workforce to improve the safety performance of the business. To this end MDA Rail will develop processes to promote better safety by means of the use of a dynamic behavioural safety programme.</p> <p>To modify the behaviour of our employees and contractors throughout the business to improve the MDA Rail safety culture and thereby improve our overall safety performance.</p>
Scope:	The requirements of this Procedure apply to all MDA Rail employees carrying out work on behalf of the business.

## 1. Roles and Responsibilities

### 1.1 Responsibility

- It is the responsibility of the Head of Rail to ensure that all staff both understand and comply with this Procedure.
- It is the responsibility of the Head of Rail to ensure that this procedure is updated to reflect identified changes resulting from the Company's review process.
- It is the responsibility of the Managers / Consultants to lead by example.
- It is the responsibility of the Head of Rail and Compliance Coordinator to develop and maintain the behavioural based safety programme.

## 2. Method

### 2.1 Procedure conformance

- This Procedure is in line with the current legislation.

## 3. Procedure - Cultural Readiness

MDA Rail must ensure before embarking on any form of behavioural safety that the company has in place a mature and proactive safety culture and that its employees are ready to take on board the changes required to further develop the safety culture, improve the safety systems and the overall safety behaviour of those in the business.

In order to measure readiness, the company has a range of components it can use:

These include the following processes:

- Questionnaires completed by employees using the Workforce Survey Form.
- Observations of work processes.
- Interviews with staff and managers.

Once it has been established that the safety culture is in place and is mature enough to start the development process the next step can take place.

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This involves briefing and educating all employees on what the behavioural safety system and processes are all about.

By use of the Network Rail Dimensions of Safety Model it can be demonstrated to staff how the measurement and evaluation of the overall company safety culture can both be measured and then developed.

MDA Rail also uses various presentations and demonstrations of what the system will look like and how it will be used to the various groups of staff in order to ensure their understanding and involvement.

### 3.1 Selecting Teams & Training Personnel

MDA Rail will set up steering groups for the various elements of the Dimensions of Safety Model from Leadership through to Processes and Systems. These groups will initially be the Managers and supervisors of the various sections of the business.

In time it is intended that these groups will include a cross section of the workforce giving an inclusive system for behavioural safety development throughout the business

Internal training sessions will be set up to develop staff understanding of the process and how they as individuals can fully contribute to the development of the safety culture improvements within MDA Rail.

### 3.2 Check Lists for Behavioural Safety Observations

MDA Rail has in place a set of check lists in Behavioural Safety Check Lists. These will be used to measure the developmental progress of the Behavioural Safety System.

The check list will be used in a fully dynamic way by ensuring all staff once familiar and receptive to the aims of the system can complete in a completely randomly selected method.

Once the steering groups have determined and implemented the each phase of the development of the Behavioural Safety System and the changes have had time to settle in, the Behavioural Safety Check Lists will be implemented as above.


Once the information has been collected from the Behavioural Safety Check Lists it will be analysed to determine the effectiveness of the changes implemented and determine what more needs to be done.

As part of MDA Rail process for the development of improved Behavioural Safety within the business both staff and contractors will be encouraged to recognise and report unsafe acts and conditions in their work place. These maybe events affecting them directly or those affecting others.

These instances can be reported using Behavioural Safety Reporting & Suggestion Form.

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### 3.3 System Feedback

Feedback from the Behavioural Safety Check Lists, Behavioural Safety Reporting Forms and the output from the steering groups will be feedback to staff representatives and all steering group members to ensure all aware of the progress being made in improving Behavioural Safety in MDA Rail.

MDA Rail will complete regular Briefings with all staff to keep them fully informed of the progress being made with regard to improvements in the company's safety performance.

## 4. Related Documents

### 4.1 Procedures

MRSOP003 - Risk, COSHH, and Fire Risk Assessment  
 MRSOP002 - Training, Competence and certificate Management

### 4.2 Forms

MRF010 - Workforce Survey Form  
 MRF011 - Behavioural Safety Reporting & Suggestion Form  
 MRF012 - Behavioural Safety Check Lists

### 4.3 External References

Network Rail Dimensions of Safety Model

## 5. Retention

Records are kept in line with our Data Protection Policy, Corporate Data Retention Policy (Appendix A Record and Retention) and Privacy Notice.

## 6. Change Management

Version	Date	Reason for Change