

Wylfa Newydd Project

8.5 Workforce Management Strategy

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Executive Summary

Introduction

Horizon will seek to maximise the number of workers recruited locally through employment initiatives. Many workers will not already live in and around Anglesey and will have to come from outside the community. Any effects of a large proportion of workers on the Anglesey communities will need to be appropriately managed and controlled during the construction period.

Horizon is committed to mitigating the potential impact of large numbers of temporary construction workers on the local community through robust and sensitive planning and management of its construction workforce and their behaviours. This strategy represents one of the ways in which Horizon will secure the effective management and control of the construction workforce, and ensure that any effects on communities are minimised as far as possible.

Scope

This document sets out the principles that will inform the development of the Code of Conduct which will guide workforce conduct and behaviours during the construction of the Wylfa Newydd DCO Project (“the Project”).

The principles are set out under workforce behaviour and employer behaviour, and relevant to individual employees, as well as Horizon and its supply chain partners and contractors.

Code of Conduct Principles

Code of Conduct principles will apply to all personnel and employers whilst working on the Project, both on-site and off-site. The principles relate to compliance with a Code of Conduct, compliance with relevant behavioural standards, procedures and legislation, training provision and completion, as well as enforcing the use of certain Project facilities and services.

Next Steps

Compliance with this strategy will be secured through a Development Consent Order (DCO) requirement which will require Horizon, prior to the commencement of construction, to prepare and implement a Code of Conduct in accordance with the principles in this strategy. Compliance with the Code of Conduct will be secured through contractual agreements between contractors and its employees.

1 Introduction

1.1.1 Horizon Nuclear Power (“Horizon”) estimates that at the peak of the construction phase, it will need around 8,500 workers to build the Wylfa Newydd DCO Project (“the Project”). Whilst the central estimate for the size of the workforce is 8,500, this strategy (consistent with the Environmental Impact Assessment) is based on 9,000 construction workers at peak. This allows for a higher number of workers overall or amongst those seeking temporary accommodation. The proposals to house these workers now comprise:

- provision of up to 4,000 bed spaces on the Site Campus (a purpose built Temporary Workers’ Accommodation within the Wylfa Newydd Development Area);
- a central case that relies on use of 3,000 bed spaces in existing accommodation across Anglesey and parts of the mainland; and
- 2,000 workers will be recruited from existing residents recruited locally who will not therefore need temporary accommodation.

1.1.2 Therefore, of the 9,000 workers predicted for assessment purposes, potentially 7,000 construction workers will be non-home based. Although Horizon will seek to maximise the number of workers recruited locally through employment initiatives, many will not already live in and around Anglesey and will have to come from outside the community. To manage the effects of a large proportion of non-home-based workers, the impacts of these workers on the Anglesey communities will need to be appropriately managed and controlled during the construction period.

1.1.3 Horizon is committed to mitigating the potential impact of large numbers of temporary construction workers on the local community through robust and sensitive planning and management of its construction workforce and their behaviours. This strategy represents one of the ways in which Horizon will secure the right workforce resources to construct the Project, secure the effective management and control of the construction workforce, and ensure that any effects on communities are minimised as far as possible.

1.1.4 For details on the other measures Horizon has in place to secure the right workforce, please refer to the Jobs and Skills Strategy (Application Reference Number 8.3) and the Workforce Accommodation Strategy (Application Reference Number 8.4), which include information on related services (Employment and Skills Service and Workforce Accommodation Management Service). These services will be secured through specific planning obligations with IACC.

1.2 Purpose

1.2.1 This document describes the key principles that Horizon and its partners, will utilise to manage and control the construction workforce. These principles will help deliver the project safely, to budget and on schedule as well as minimise the potential effects of large numbers of temporary construction workers on the local community. Horizon will ensure enforcement of the standards and

procedures and will provide support to the community and stakeholders to avoid foreseeable problems and when they arise respond quickly, effectively and seek to prevent recurrence.

- 1.2.2 Compliance with this strategy will be secured through a DCO requirement which will require Horizon, prior to the commencement of construction, to prepare and implement a Code of Conduct in accordance with the principles in this strategy. The Code of Conduct, which will apply to all personnel involved in the Project, will ensure that the identified social, economic and environmental effects of the construction workforce will be appropriately mitigated and managed throughout the construction period. Horizon will work with the supply chain, trade unions and contractors to develop and agree the content and form of the Code of Conduct.
- 1.2.3 As Horizon will not directly employ all personnel involved in the Project, compliance with the Code of Conduct will be secured through contractual agreements between contractors and its employees. Horizon will ensure that each contractor agrees to comply (and require its employees through their individual contracts to comply) with the Code of Conduct for the duration of the construction period (which is when the impacts of construction workers will be greatest). Horizon will work with the supply chain, trade unions and contractors to develop and agree the content and form of the Code of Conduct so that it has the full support of Horizon's contracting partners.
- 1.2.4 The Code of Conduct is intended to supplement, but not replace, existing law and order provisions in place to protect members of the community and which all individuals are responsible for abiding by. Horizon will ensure that the Code of Conduct is publicly available so that the community are aware of the expected standards of behaviour, the consequences when these behaviours fall short of expected standards, and channels for the community to engage with Horizon over workforce conduct.

1.3 Context

- 1.3.1 Through the Pre-Application Consultation process (as detailed in the Consultation Report [Application Reference Number 5.1]), Horizon has gained a comprehensive understanding of the issues that are of concern and importance to local communities, councils and other stakeholders. These include effects on community cohesion (including the Welsh language); traffic and transport; night-time economy; potential for crime and anti-social behaviour and effect on local services and accommodation as a result of temporary workers living across Anglesey. All effects are identified in the Environmental Statement (Application Reference Numbers 6.1.1 to 6.11), Health Impact Assessment (Application Reference Number 8.19), Equality Impact Assessment (Application Reference Number 8.22) and Welsh Language Assessment (Application Reference Number 8.21). This Workforce Management Strategy, therefore, seeks to set the framework for preventing and managing the potential negative effects of workforce behaviour on the community that have been identified within these documents.

1.4 Scope

1.4.1 This document sets out the principles that will inform the development of the Code of Conduct which will guide workforce conduct and behaviours during the construction of the Project. The Code of Conduct, which will be prepared in accordance with the principles in this strategy, will:

- communicate the behaviours expected of workers;
- outline the means by which the Code of Conduct will be communicated to all personnel and the community;
- outline the role and responsibilities of employers;
- outline the monitoring mechanism for the Code of Conduct during the Project; and
- inform the community of the standard of behaviours they should expect from workers and their employers through the publication of the Code of Conduct.

1.4.2 The principles set out in section 2 are separated into:

- workforce behaviour principles: these principles will guide the development of requirements in the Code of Conduct regarding individual employee behaviour while employed on the Project; and
- employer behaviour principles: these principles will guide the development of requirements around the conduct of Horizon and its supply chain partners and contractors in managing staff and enforcing compliance with the Code of Conduct by employees.

2 Principles

2.1.1 Horizon will ensure that the following key principles form the basis of the Code of Conduct.

2.2 Workforce behaviour

2.2.1 In preparing the Code of Conduct relating to workforce behaviour, the following principles will be included:

- All personnel will be required to behave in accordance with the Code of Conduct at all times, regardless of whether they are on-site and off-site within the community. All personnel will receive a copy of the Code of Conduct and will be required to comply with it. Horizon will require construction workers, as part of their orientation, to sign a copy of the code of conduct (acknowledging they have read and understood it).
- All personnel will be required to attend and complete all necessary induction and training programmes prior to the commencement of work. Training programmes will include information such as:
 - community relations and expectations of the workforce in the local communities;
 - Welsh language and culture; both awareness and language skills (training level to correspond to job requirements);
 - health and safety, including occupational health and hygiene;
 - the Workforce Accommodation Management Service
 - key environmental issues (including legal obligations protections); and
 - job specific-requirements and obligations.
- All personnel must demonstrate a respect and appreciation for the Welsh language and culture and be encouraged to demonstrate basic linguistic courtesy through developing these skills during their induction and use within the community.
- All personnel must comply with job-specific obligations and requirements (i.e. abiding by constructional and operational controls identified in securing documents) as well as any construction-related plans or strategies. Information packs containing the Construction Traffic Management Strategy will be provided to all construction workers at their induction. The information packs will contain but not be limited to the following:
 - HGV routes and route restrictions (if appropriate);
 - Safety and operational requirements;
 - construction vehicle routes (if appropriate);
 - non-compliance guidance;
 - complaints procedure;
 - bus routes.

- All personnel must be courteous to members of the public and respect and support the needs of the communities in which they work.
- All personnel must use the transportation services and facilities provided as part of the Project (i.e. the Park and Ride Facility, shuttle bus services, and car sharing initiatives) to travel to the Wylfa Newydd Development Area. Alternative travel arrangements (i.e. individual cars) must be pre-approved by the Employer and will only be allowed in limited circumstances.
- All personnel will also comply with any vehicle registration procedures. All personnel using the Park and Ride Facility will be required to register their cars and contact details with Horizon. Any personnel found to be parking outside designated areas (or 'fly parking') will be disciplined.
- All personnel must register with the Workforce Accommodation Management Service. All non-home-based personnel should seek to use the Workforce Accommodation Management Service to identify and secure accommodation in the first instance, before using other accommodation services. All personnel should provide information on selected accommodation choices when requested for data collection purposes.
- All personnel (not just those residing on the Site Campus) must use the temporary health and welfare facilities on the Site Campus in the first instance, before seeking to use community services. Horizon will require construction workers to register with, and, prioritise the use of the on-site medical and healthcare services rather than using the community NHS services.
- All personnel to be aware of and comply with policies regarding drug and alcohol use including:
 - The making, selling and use of any unlawful drugs is strictly prohibited and will result in immediate dismissal.
 - All personnel will drink responsibly and avoid the excess consumption of alcohol both on-site and off-site.
 - All personnel will be subject to random drug and alcohol testing and related searches.
- All personnel must be aware of and comply with all health, safety, security and emergency processes and procedures while on-site and challenge and address and report any non-compliances and breaches immediately.
- All personnel must observe and comply with applicable law, regulations and professional standards at all times and ensure no damage of any kind is caused to property within the community.
- All personnel must work in a safe and responsible manner with due respect for their safety and safety of others at all times.
- All personnel will be required to act as ambassadors for the Project through their behaviour and actions (including their use of social media)

when in the community and at all times.

- All personnel must treat others with respect and refrain from anti-social, criminal, violent or discriminatory behaviour or sexual harassment and understand that these behaviours will not be tolerated at any time.
- Worker accommodation (Site Campus, private, tourist or otherwise) must be treated with respect and maintained in a clean and tidy state, including proper waste disposal.
- All personnel residing at the Site Campus must abide by all site protocols and procedures relating to security, parking, housekeeping (for, example, curfews, noise restrictions and emergency procedures), and dispute resolution.
- All personnel must be aware of nearby sensitive ecological receptors (such as Wylfa Head, Tre'r Gof and Cemlyn SSSIs, Cemlyn Lagoon, and nature reserves) and their legal protection, and ensure no damage or interference of any kind is caused to these areas through, for example:
 - keeping to defined paths at all times,
 - refraining from littering;
 - refraining removing or damaging vegetation or habitats; and
 - impacting on any species within these areas (particularly nesting species).
- All personnel must ensure that personal noise levels are appropriate at all times and all locations.
- All personnel will comply with the Construction Traffic Management Strategy as set out in the Wylfa Newydd Code of Construction Practice (Application Reference Numbers 8.6 to 8.12), including speed limits, the highway-code, identified route restrictions and be respectful of other road users including agricultural vehicles, pedestrians, cyclists and livestock.

2.3 Employer behaviour

2.3.1 In preparing the requirements in the Code of Conduct relating to employer obligations, the following principles will be included:

- Management and monitoring of breaches in health, safety and environment standards as well as breaches in Code of Conduct. Employers should establish regular reporting processes to Horizon and mechanisms for Horizon to have oversight on key issues and targets (for example, establishment of Oversight Boards).
- Ensure and confirm all personnel are familiar with the Code of Conduct and expected behaviours prior to commencing work on site.
- Ensuring that the Code of Conduct are effectively communicated to the community so that there is awareness of expected standards of behaviours and avenues for seeking redress.
- Supervisors should make personnel aware of any shortcomings in their

conduct and wherever possible seek to address them as soon as possible.

- Ensure effective disciplinary procedures are in place to reinforce the behaviours expected of personnel and ensure all incidents are investigated as soon as possible. This may require liaising and assisting with police services in their investigation of criminal matters such as drug and alcohol offences.
- The workforce is to be treated fairly through appropriate industrial relations agreements and processes.
- Working hours and conditions will accord with relevant health, safety and environment standards and legislation.
- Appropriate security checks will be carried out on all construction personnel, such as Basic Disclosure Certificate and Confirmation of Right to Work in the UK, National Security Vetting, Baseline Personnel Security Standard and Counter-Terrorist Check.
- Ensure strong regard is given to the needs and concerns of the community and respond in a timely manner to any concerns or reasonable requests for information made by members of the community regarding works being undertaken and conduct of personnel, as well as any disciplinary action taken. The Employer will establish a process for promptly dealing with any complaints raised through the complaints register under the Wylfa Newydd Code of Construction Practice and reporting how issues have been resolved to Horizon.
- Employers will ensure that all construction personnel is registered for the Workforce Accommodation Management Service. Employers should discourage staff from sourcing accommodation outside of the Workforce Accommodation Management Service.
- Employers will seek to maximise local employment, through the involvement in apprentice and trainee programmes, engagement of local suppliers, and recruitment in accordance with relevant Key Performance Indicators (KPIs) set out in planning agreements. Employers will regularly report to Horizon on achievement of identified KPIs.
- Employers will seek to control workforce access to existing public facilities, footpaths and open spaces in proximity to the Site Campus. This could include physically limiting access to these areas, or limiting the number of workers allowed within these areas at any one time.
- Proactive links to be established between the Project (Security, Help-line, Community Involvement Officers and Welsh Language and Culture Co-ordinator) and the emergency services on the island (Police, Fire Services, Emergency Air Services, Ambulance Service) to ensure effective communications and incident response.
- Roles for Community Involvement Officers and a Community Liaison Group will be established to support proactive communication with the community.
- Encourage all personnel to use temporary health and welfare facilities

on site and within the Site Campus in order to deal with the majority of worker health and welfare requirements and incidents and this will include access to doctors and nurses.

- Employers will ensure all personnel are adequately trained and capable to carry out their roles. Training programmes will be developed in consultation with Horizon and will include information on:
 - community relations and expectations of the workforce in the local communities;
 - Welsh language and culture (both awareness and language skills (training level to correspond to job requirements) and Horizon's Welsh Language Policy;
 - health and safety, including occupational health and hygiene;
 - key environmental issues (including legal obligations protections); and
 - job specific-requirements and obligations (for example, controls around the use of HGV operation).
- Enforce Horizon's personnel screening and management system processes to identify any of the workforce which may pose a risk to vulnerable adults and children in accordance with Hitachi Group Codes of Conduct and the Horizon Nuclear Power 'Modern Slavery Act 2015 Statement. In such cases where a potential risk is identified, further checks will be carried out.
- Ensure there is a range of social, leisure and sporting facilities on the Site Campus in order to occupy workers during their free time including a multi-use games area, gym, and a number of other facilities. Employers will liaise with the local community to discuss opportunities for these facilities to be used by the local community and vice versa.
- Employers will adhere to all corporate business policies as advised by Horizon, including but not limited to, policies relating to Welsh Language, Modern Slavery, Supply Chain (Environmental and Corporate Sustainability) and Human Resources. Employers will ensure that all personnel are aware of, and comply, with these policies.
- Employers will work collaboratively with Horizon and other suppliers to ensure that everyone involved in the Project understands the need to respect local communities when working on the project and are focused on helping to mitigate potential effects on local communities.
- Employers will implement the Construction Traffic Management Strategy, as set out in the Wylfa Newydd Code of Construction Practice (Application Reference Number 8.6 to 8.12), to manage workforce and construction movement to reduce effects on local road network.
- Employers will comply with any requirements advised by Horizon in respect of recruitment processes including requirements to advertise job profiles through Welsh and local brokerage services, include language requirements within job profiles, and appoint a Welsh speaking staff

member to all interviews for roles which require Welsh language skills.

- Employers will facilitate data collection of workforce demographics, subject to privacy laws, to assist in ensuring education, health and housing demand is managed appropriately.
- Employers will reinforce the key messages and behaviours set out in the Code of Conduct in ongoing workforce engagement and communications activities.

3 Next Steps

- 3.1.1 The above principles will support Horizon in managing the construction workforce which will build the Project.
- 3.1.2 Horizon will work with the supply chain, trade unions and contractors to develop and agree an appropriate Code of Conduct that will apply to all personnel employed with the Project during construction.
- 3.1.3 The obligation for Horizon to prepare and submit for approval a Code of Conduct in accordance with the workforce management principles will be secured under a DCO requirement. The Code of Conduct must be in place prior to commencement of the construction works, excluding Site Preparation and Clearance Works. Once approved, Horizon will be required to implement the Code of Conduct during the course of construction.
- 3.1.4 As Horizon will not directly employ all personnel during construction of the Project, where this is the case, implementation and enforcement of the Code of Conduct will be the responsibility of the contractor. In order to facilitate this, the agreement between Horizon and the contractor will provide that the contractor must comply (as the Employer) with the Code of Conduct and require all personnel to comply as part of their subsequent employment agreements with the contractor.

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