

COWI UK & IRELAND

WORKING HOURS POLICY

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1 Objective

It is our objective to promote a positive culture around health and safety, to prevent employees and others working on our behalf from working excessive hours, which can contribute to fatigue.

We acknowledge and are committed to fulfilling our statutory and other obligations with regard to implementing an effective working hours policy. We will comply with the requirements of The Working Times Regulations, The Organisation of Working Time Act (Ireland), The Railway and Other Guided Transport Regulations and other client requirements.

We have a duty to ensure, so far as is reasonably practicable, the health, safety and welfare of all our employees and all persons likely to be affected by our actions.

We are committed to continual improvement in health and safety, in the wellbeing and good mental health of our employees, providing safe and healthy working conditions and the prevention of accidents, injury and ill health in the workplace.

We recognise that strong health and safety leadership is essential to maintaining and developing a good working environment.

2 Scope

COWI in the UK & Ireland are companies of consulting professionals, specialising in the design and development of transportation infrastructure and energy projects. We undertake projects at our offices in Bristol, Derby, Dublin, Glasgow, London and York. We are a subsidiary of COWI A/S.

3 Policy statement

We will comply with the COWI Group Occupational Health and Safety Policy, which states:

- › We will not compromise a healthy and safe working environment for economic or productivity reasons.
- › We will encourage our employees to openly share and discuss health and safety issues.

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- › We will emphasize that a healthy and safe working environment requires awareness from both management and employees.
- › We will comply with all relevant health and safety legislation and codes of practice.

We will take measures and monitor, as far as reasonably practicable, to ensure that all employees and others working on our behalf are aware of and adhere to the guidelines for working hours and fatigue management.

In particular we shall:

- › Demonstrate commitment from the Board of Directors to promote a positive health and safety culture and the prevention of fatigue through excessive working hours.
- › Implement and maintain a Health and Safety management system in accordance with the principles of ISO 45001:2018.
- › Provide relevant information, training, resources and support with regard to the management of fatigue.
- › Comply with all relevant health and safety legislation, guidance, best practise and other requirements. In particular, the Working Times Regulations state a maximum of 48 hours averaged over 17 weeks / (48 hours averaged over 4 months for the Organisation of Working Time Act).
- › Ensure that employees are not treated unfairly if they choose not to "opt out" of the Working Time Regulations.
- › Include within our total working hours for the day sufficient rest/breaks and travel time. (Travel time does not include commuting to and from your contracted place of work).
- › Plan not to exceed the maximum working hours by putting alternative arrangements in place, such as overnight accommodation, reducing the working hours, etc.
- › Implement a process for identifying and managing working hours and any deviations from the maximum working hours limits, including suitable risk assessment.
- › Monitor usage of annual leave and encourage our employees to take regular breaks throughout the year.
- › Introduce the HSE Fatigue Risk Index Calculator tool to assist in planning shift working (a requirement for Network Rail projects).
- › Cover the cost of overnight accommodation, regardless of travel time, if an employee feels fatigued.
- › Set maximum working hours as follows:
 - › 12 hours per day, door to door (which may be extended occasionally to 14 hours, providing a maximum of 1 hour travel each way)
 - › 60 hours per rolling 7 days when performing safety critical work or driving duties

- › 72 hours per rolling 7 days when not performing safety-critical work or undertaking driving duties
- › 12 days working within a 14-day period (12 days working within a 14-day period for Ireland)
- › 12 hours rest before and after shifts.
- › Night workers must not work more than 8 hours in a 24-hour period, averaged over 17 weeks.

In addition, for working on the London Underground (LU):

- › 6 consecutive days followed by a rest period of not less than 24 hours
- › 12 consecutive days followed by 2 rest periods, each of which is not less than 24 hours
- › Within a 14-day period, 2 rest periods, each of which is not less than 24 hours.
- › 12 hours rest preceding the start of a training course.

We are committed to continual improvement in fatigue management through:

Reviewing this policy annually or more frequently, depending on legislation changes or changes in work practices.

Regular feedback and consultation with employees, and providing current, relevant health, safety and wellbeing information.

Monitoring and reporting

All employees are required to register their working hours on the company time management system.

We will provide a regular working hours report to our Line Managers to enable them to monitor and investigate any exceedances.

We will proactively monitor our health and safety management system through audits and inspections.

Records will be retained for those who have opted out of the Working Times Regulations.

Accountability and responsibility

The Board of Directors is ultimately responsible for setting objectives to promote a positive health, safety and wellbeing culture for all employees, allocating suitable resources to manage working hours and resources on projects.

The Senior Vice President responsible for Health and Safety is responsible for raising any health, safety and wellbeing concerns to the attention of the Board of Directors for action and additional allocation of resources where required.

The Senior Vice President responsible for Health and Safety and the Head of Health and Safety are responsible for monitoring company health, safety and wellbeing operations and for the issue of related instructions and information.

All employees have a responsibility:

- › To comply with their legal responsibilities as an employee under health and safety legislation.
- › To take reasonable care of their own health, safety and wellbeing and that of others who may be affected by their actions or omissions.
- › To co-operate with the company policies in place to protect them and others.
- › To be physically, mentally and emotionally well to be able to perform their tasks competently and safely.
- › To not be unduly fatigued when presenting for duty.
- › To report any accidents, incidents, near misses, unsafe acts or unsafe behaviours in accordance with company procedures.
- › To stop work and report if they are asked to participate in an activity which is unsafe, including if they are fatigued and unable to safely perform their duties.
- › To help implement this policy.

Signed: 

Andrew Sloan
Senior Vice President
COWI UK Limited

31st March 2025

Useful links, including to other relevant COWI policies

- › [IMS Tool box](#)