

Health, Safety and Sustainability Policy

| Owner | |
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| Name | |
| Title | Chief Executive Officer |
| Signature | |
| Date | 29 December 2020 |

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| Title | Director of Health, Safety, Sustainability and Connections. |
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| Date | 29 December 2020 |

This document forms part of the UK Power Networks Integrated Management System and compliance with its requirements is mandatory. Departure from these requirements may only be taken with the written approval of the above authoriser.

| Revision Record | | | | | |
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| How have working practices changed? No changes to working practices, Section 4.3 Objectives and Programme(s) wording regarding stay safe programme has been updated. HSS policy poster updated for 2021 | | | What is the impact of the change? No impact anticipated. | | |
| Prepared by | | | | | |
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| Revision Record | | | | | |
|---|-----|-----------------------|--|--------------------|------------|
| How have working practices changed? No changes to working practices, document updated in section 4.3 Objectives and Programmes to include the health and wellbeing programmes and the green action plan and section 4.6 Communications expanded include two way communications and consultation. HSS policy poster updated for 2020, and renumbered from BS01a, to BS00a. | | | What is the impact of the change? No impact anticipated. | | |
| Prepared by | | | | | |
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| Prepared by | | |

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1.0 Introduction and purpose

Section 2 of the Health and Safety at Work Act 1974 (the HSW Act) places a duty on employers to ensure the health, safety and welfare of employees as far as is reasonably practicable. It also requires employers to consult with trade union safety representatives on matters affecting health and safety in the workplace. Moreover, employers of more than five people must prepare a written health and safety policy and bring it to the attention of employees.

To comply with this legislation, UK Power Networks recognise our responsibility to promote and deliver the highest standards whilst managing safety, health, welfare and environmental risks through our activities. This supports our vision to be a respected corporate citizen, sustainably cost efficient and an employer of choice.

We are committed to continuing our journey of improvement in this regard by serving the best interests of our people, contractors, visitors, customers and the environment. This will include continued close collaboration with Trade Union Safety Representatives.

The focus is to deliver continuous improvement in all aspects of health, safety and sustainability ensuring that UK Power Networks remains at the forefront of the sector.

There are four key areas of focus:

- **Risk Control** – ensuring key SHE risks are rigorously managed through an integrated business plan; implementing robust organisational resilience plans, obtaining greater insight from incident and investigation data and reporting; and undertaking comprehensive technical assurance monitoring.
- **High quality standards** – ensuring roles, accountabilities and requirements are clear, unambiguous, easy to understand and can be consistently applied. This includes ensuring investigations are thorough and delivering comprehensive technical training content that assesses both operational and electrical knowledge.
- **Communication to employees, contractors and the public** – through impactful and thought provoking means to keep safety front of mind at all times. This will include working in tandem with co-ordinated national initiatives through the Energy Networks Association (ENA). The communication of this policy is supported by the Health, Safety and Sustainability policy statement (BS 00a)
- **Stakeholder Engagement** – strengthening awareness of health and wellbeing amongst our people to reduce workplace errors through the ‘Your Energy’ programme; improving our safety culture further as a result of the new ‘Stay Safe’ programme; targeting third party key safety risk groups with the new ‘Be Bright Stay Safe’ public safety campaign; driving improved awareness of environmental and sustainability workforce responsibilities through our ‘Green Action Plan’; and working closer with Trades Union H&S Representatives, Stay Safe Coaches and Health & Wellbeing Champions as well as key external groups.

2.0 Scope

This policy applies to all employees and contractors working on our behalf, whilst at work, and others including visitors, suppliers etc. while on UK Power Networks and UK Power Network Services controlled sites.

3.0 Responsibilities

3.1 Company responsibilities

In order to ensure that these objectives are met:

- Relevant health, safety and sustainability legislation is complied with;
- A structured risk management approach is applied to all tasks, activities and equipment to ensure all risks are managed to as low as reasonably practicable;
- Sufficient competent occupational health, safety and sustainability advice is available;
- Appropriate training is provided to employees;
- Communication, consultation and engagement on health, safety and sustainability matters are undertaken;
- Regular review and where necessary updating of procedures and work practices is undertaken;
- Strategies are developed and delivered for sustainability and health & wellbeing;
- Incidents whether safety, environment or ill health will be thoroughly investigated and the lessons learned, implemented and communicated; and
- External and internal audits of compliance are undertaken and actions are effectively managed and a review of performance conducted at the most senior level.

3.2 Manager's responsibilities

Management has an important part in ensuring the safety, health and welfare of our people, with due consideration to environmental impact. To do this they will:

- Take accountability for the safety performance of their team;
- Consult and involve employees and their elected representatives in the achievement of the safety, health and environmental targets;
- Promote the culture that every job will be undertaken safely, in line with relevant policies and procedures and with due care for the environment, no matter how important or urgent it is;
- Demonstrate an understanding of UK Power Networks' procedures and communicate this when putting people to work; and
- Address unsafe work practices and take steps to ensure that risks are managed.

3.3 Employees' responsibilities

Every employee has a responsibility for health, safety and sustainability. To do this they will:

- Ensure that all work is done safely and with due care for the environment, no matter how important or urgent it is;
- Demonstrate an understanding of and follow procedures and training;
- Be accountable for their personal safety;
- Take responsibility for personal safety and the safety of others and our environment;
- Constructively challenge others who are not following procedures; and
- Report near misses and deal with hazards to help create a harm-free workplace.

4.0 Policy Detail

4.1 Hazard identification, risk assessment and determining controls

Risk assessment is a fundamental and essential requirement for all tasks to identify, evaluate, control or eliminate any element of risk to safety, health or the environment. Generic risk assessments are available on the intranet but only act as a guideline.

For each new task, a documented task based risk assessment often accompanied by a method statement is required to be communicated to all persons involved in the task. Records of briefings must be retained.

Further information and advice on the risk assessment process operating within UK Power Networks may be sought from the local health and safety advisor.

4.2 Legal and other requirements

Legal requirements relating to UK Power Networks' activities have been identified and documented within a Legislation Register. This should be consulted for all new projects to ensure that the project is compliant with all associated statutory and regulatory obligations and responsibilities. Projects which require other requirements that are not documented on the Legislation Register, such as Rail or Defence specific requirements, must be documented and reviewed before work is undertaken.

4.3 Objectives and programme(s)

Key risks to Health Safety and Sustainability have been identified within UK Power Networks and objectives have been established which are specific, measurable, achievable, realistic and timely. Health, safety and sustainability objectives are documented within the business plan and reviewed every year.

Stay Safe continues to be an integral element to the safety performance across UK Power Networks.

Public safety is also an area of continued focus through the Be Bright Stay Safe programme.

The Working Well and Wellbeing programme is a key health theme programme which focuses on physical and mental health and wellbeing of all employees.

The Green Action Plan (GAP) has been established across the business and drives continued focus on UK Power Networks environmental and sustainability targets.

4.4 Implementation and operation

Operational control

UK Power Networks operations that have potentially significant health safety and sustainability aspects must be carried out under specified conditions in order to meet policies and objectives as well as legal and other applicable requirements.

Each directorate therefore has a discrete suite of procedures, processes, work instructions and support documents to enable it to carry out its functions effectively.

Compliance with the Construction Design Management Regulations 2015 is a major factor when carrying out construction projects and information relevant to all Directorates is available on PowerNet.

Competence, awareness and training form an important part of operational control and this process is outlined below.

4.5 Competence, training and awareness

All employees involved in activities within the scope of the SHE Management System will receive appropriate training, or possess the appropriate qualifications, in order for them to have the necessary skills and competency to satisfactorily perform their required work.

The line managers are responsible for ensuring that all training and competence refresher is requested through the Learning Management System (LMS).

4.6 Communication

Internal communication is important to ensure the effective implementation of the integrated management system.

Effective communication is achieved via face-to-face meetings, intranet, tool box talks, team meetings, roadshows, emails, company journals & bulletins.

Two way communication and consultation with employees and the trade unions is achieved through various meetings including, the Company Health & Safety Executive Committees (CHSEC), Directorate, Regional and Area Health Safety and Environment Committees and Specific Action Team (SATs) meetings, as well as other consultation forums.

Safety of the public and third parties remains a key focus area for UK Power Networks. Various printed and digital media are deployed targeting key at risk groups from activities close to the distribution network. A wide range of communications channels are exploited. Close collaboration with other UK Distribution Network Operators on national public safety campaigns will continue to good effect.

4.7 Emergency preparedness and response

Contingency planning is essential to enable effective response to any unplanned events, potential emergency or disaster. Each Directorate is responsible for ensuring that adequate resources, trained staff, equipment and emergency plans are in place to manage such events.

UK Power Networks in particular operates robust contingency plans to deal with system emergencies. Plans should be rehearsed and reviewed periodically or following an unplanned event that had potential for significant harm to health, safety, sustainability or business continuity.

Typical inputs for emergency plans include hazard identification and risk assessment, availability of local emergency services and contact numbers, emergency equipment, evacuation procedures etc.

There are a number of emergency response procedures on the intranet that cover fire, environmental pollution, flooding and accidental release of SF6 from equipment, however it should be noted that most projects are unique and therefore may warrant the production of emergency plans for that particular project.

4.8 Performance measuring and monitoring

UK Power Networks recognises the need to measure business performance with respect to the key elements of its strategy, policies, procedures and overall level of service. Incidents that have an impact on health, safety and sustainability are monitored through the HSS performance report, VSI/SI reporting and environmental reporting.

Business performance and opportunities for improvement are discussed at management review meetings and areas of poor performance are targeted for improvement actions.

To enable effective and informed decisions to be taken, UK Power Networks collects and analyses important data. The daily performance report gives a current view of safety incidents as well as network performance data. Information is collated and reported monthly to present a wider viewpoint.

4.9 Evaluation of compliance

UK Power Networks has a legal and moral responsibility to ensure that the business fully complies with all pertinent health, safety and sustainability legislation. Legislation updates are sourced in line with the procedure for Compliance with Legislation LEG 02 002.

Policies and procedures contain references to current legislation where appropriate and a [Legislation Register](#) is kept up to date and is available on the internet. Compliance with legislation is undertaken as part of the internal audit process.

4.10 Incident investigation

UK Power Networks carry out incident investigations in line with procedure HSS 01 052 (Incident Investigation). The lessons learned are communicated and actions taken to address findings.

4.11 Internal audit

Internal Audits are conducted to maintain the integrity of UK Power Networks' systems through risk and compliance based audits. Internal audits are conducted in accordance with the detailed procedure for [Business Systems Auditing](#) BS 05.

All identified non conformities and opportunity for improvements will be recorded in the Enterprise Risk & Control tool (ERC). These are discussed and actioned as part of the Management Review procedure BS 04.

5.0 Records

Records will be held electronically for a minimum of 5 years.