Health, Safety & Wellbeing – Absolute Rules
power to you
Breaking our Absolute Rules is unacceptable

We must always intervene when we see unsafe acts

Global Health, Safety & Wellbeing
Background

The following six rules have been developed to focus attention on common causes of fatalities and serious injury. We know from experience, that failing to follow basic health and safety standards, leads to serious injury and fatalities for our people, the people we work with, and the people exposed to our activities being seriously injured or killed.

Our Absolute Rules are mandatory and we encourage reporting of non-compliance. All reports will be investigated and may result in discipline.

This standard is applicable to all operations under Vodafone’s operational and/or governance control.

Minority interest JVs are encouraged to participate.
Our Absolute Rules
All employees and contractors working for Vodafone must:

**Always** wear seat belts when travelling in, or operating vehicles.

**Always** use suitable PPE, a safety harness and fall protection equipment when working at height (harnesses must be attached at all times when working at height).

**Never** carry out electrical work on electrical equipment, circuits and gear if you are not qualified.
Never work under the influence of substances (alcohol or drugs) which are illegal or in excess of legal levels or where this impairs the individuals’ ability to perform tasks.

Never exceed speed limits or travel at speeds which are dangerous for the type of road, vehicle, or conditions.

Never use a hand held phone whilst driving and only make calls by pulling over or using hands free devices, when it is safe to do so.
Discipline

Failure to comply with Absolute Rules will result in an investigation which may lead to disciplinary action. This could include termination of employment for Vodafone employees.

Employees of contractors or subcontractors may be removed from site and disqualified from future Vodafone work.

Line managers will be held responsible for communicating rules and ensuring compliance.
Q: Should I travel in a vehicle that does not have a seat belt?
A: You should not use cars or buses which do not have seat belts.

Q: If it is safe to drive above the speed limit, is the decision up to me?
A: Vodafone’s rule is that you should never exceed a speed limit.

Q: Are there any situations where it is not possible to use a full safety harness when working at height?
A: No.

Q: Can I have an alcoholic drink at a lunch time event?
A: The consumption of alcohol during work time is prohibited.

Q: What is the investigation process to be used following a reported breach of a rule?
A: The incident will be reported to and investigated by your line manager, who may involve the HS&W team. If the outcome determines that disciplinary action should be taken this will involve HR.
Q: I am a supervisor/manager, what happens if one of my team does not meet these requirements?
A: You may be subject to the same disciplinary process if the investigation identifies that you have contributed to the non-compliance.

Q: If I see people not complying with Absolute Rules, what should I do?
A: Ask them to comply and if they do not, report them to your line manager or to HR.

Q: Do these rules apply to all employees no matter how senior?
A: Yes. Also suppliers and contractors working for Vodafone.

Q: How long should the implementation take?
A: From initial briefings there should be an implementation phase of about 6 months. At the end of this period there should be a well publicised ‘Go Live’ date.

Q: What is the disciplinary process to be used following a breach of a rule?
A: The use of discipline will be evaluated on a case by case basis. The approach may vary from country to country. During the implementation phase warnings should be given for initial breaches.
Management Resources

• Background events / incidents
• Suggested implementation plan
• Posters and handouts
• Advice to employees
• Advice to suppliers
• Guidance for induction training
• Self audit

Suggested implementation plan

• Briefing from Group HS&W

• Implementation
  – HS&W review of investigation process
  – HR review of discipline process
  – Management briefing
  – Employee briefing
  – Contractor briefing
  – Reinforcing communications
  – Self audit
  – Evidence to demonstrate individual attendance

• Go Live

• Audit
  – Local measures to track adherence and non-conformance
  – Commendations for best practice
  – Continual monitoring of Absolute Rules embedded in work practices
Self Audit

The following self audit has been prepared to evaluate the level of preparedness within an organisation prior to Go Live. Go Live should be delayed if the results indicate that employees or suppliers/contractors are unaware of the proposed rules.

Communication Training

• Have all senior management been briefed?
• Have all managers/supervisors been briefed?
• Have all employees been briefed using team brief, tool box talks etc?
• Are Absolute Rules a part of employee/contractor induction?
• Is there agreement on the investigation process to be used following a breach of the rules?
• Is there agreement on the discipline process to be used following a breach of the rules?
Seat Belts

- Has the Vodafone Group HS&W Standard 06 – Driving at work, been implemented?
- Has the requirement to wear seat belts been communicated to all staff and contractors?
- Are all company vehicles fitted with seat belts?
- Are seat belts checked as part of routine maintenance?
- Do all supplier contracts require all vehicles to be fitted with seat belts?
- Where taxies are used, are they all fitted with seat belts?
- Are company mini buses and coaches fitted with seat belts?
- Are seat belts specified when mini buses/coaches are hired?
- Does driver training include the use of seat belts?
- Is there a process to enforce the use of seat belts? Such as 'stop and check' at entry/exit to sites, inclusion on site checklists etc.
Use of Harnesses

- Has the Vodafone Group HS&W Standard 11 – Working at Height, been implemented?
- Where you deliver work at height training, does this cover the use of harnesses?
- Are all personnel engaged in working at height issued with the correct PPE?
- Do contracts with suppliers engaged in working at height, include the requirement to use safety harnesses?
- Is there a process for monitoring the use of safety harnesses for activities engaged in working at height? e.g. site inspections, spot checks, reporting process.
- Do infrastructure design specifications address working at height risks, including provision of fall prevention and arrest systems?
Electrical Safety Qualifications

- Has the Vodafone Group HS&W Standard 07 – Electrical Safety, been implemented?
- Have those engaged in electrical work received appropriate training?
- Do contracts with suppliers engaged in electrical work, include the requirement for all personnel working on electrical installations to be trained?
- Do inductions, or any other training, inform those who may come into contact with electrical installations (e.g. distribution panels, UPS equipment, switch gear) of the risks associated with this equipment?
- Are personnel explicitly forbidden from working on electrical equipment unless there are appropriately trained?
- If a ‘permit to work’ system for electrical work is in use, are relevant personnel aware of the system?
Alcohol and Drugs

• Do you have a policy/process to control the use of drugs and alcohol at work?
• Are the requirements of this policy clearly communicated to all staff and contractors?
• Is alcohol available on site?
• Are managers and supervisors aware of ‘tell-tell’ signs of alcohol/drug abuse?

Driving within the Speed Limit

• Has the Vodafone Group HS&W Standard 06 – Driving at Work, been implemented?
• Has the need to drive at safe speeds been communicated to all drivers?
• Where specific driver training is delivered, does it cover the need to drive at safe speeds and within speed limits?

• Do you have a process in place to monitor the behaviours of drivers, including speed? (e.g. monitoring devices, reporting processes, regular driver assessments).
• Have company drivers received suitable driver safety training where specified in the risk assessment and
• Do you confirm that all drivers hold appropriate licences?
Mobile Phones and Driving

• Has the Group HS&W standard No 13 – Mobile Phones and Driving, been implemented?
• Have the requirements of this policy been communicated to all staff and contractors?
• Have employees been made aware of the risk of physical and mental distraction when using phones whilst driving?

• Are all company cars fitted with hands free capability? Do the phones issued to staff have the functionality to use hands free equipment?
• Do you have a process for monitoring the use of handheld mobile phones whilst driving?
• Have managers been made aware of the health and safety issues relating to contacting personnel whilst driving?