



Vodafone Policy Detailed Requirements

HSE Incident Reporting and Investigations

Policy Owner:	Policy Champion:	Version:	Date:
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Objective/Risk:	Scope
Vodafone is committed to manage all incidents, investigate as appropriate to prevent recurrences, adopt learning to enable improvement, demonstrate compliance and enhance corporate reputation.	<p>This document applies to all employees, contractors and others working for or on behalf of Vodafone UK. It has particular relevance for managers and supervisors in respect of the guidance provided on reporting, investigations and escalation for notifications.</p> <p>This document relates only to work related health, safety and environmental incidents.</p>
Compliance levels are monitored and reviewed by appropriate governance bodies. Any breach will be treated as a serious disciplinary offence and may be subject to disciplinary action.	

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1. Policy principles

The principles set out in this document are based upon [The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013](#). This document forms part of a larger management system for controlling Health and Safety risks. As part of Vodafone UK's safety management system, responsibilities (outlined in this document) are placed upon people at all levels of our organisation.

Vodafone is committed to managing incidents to:

- Ensure adequate control of risk,
- Prevent recurrence,
- Improve workplace and environmental conditions,
- Identify and address adverse performance trends,
- Facilitate benchmarking of performance against other Vodafone operating companies and external organisations,
- Manage reputational risks, and
- Comply with legal and insurance requirements.

All employees and contractors are to notify all incidents with the minimum of delay, acknowledging the time scales as given in Section 2 for Fatal, Major and High Potential Incidents.

Vodafone employees are required to report incidents as soon as is practicable to their Line Manager.

Incident reporting requirements for contractors working on Vodafone's behalf are communicated via the [UK Supplier Health and Safety Policy](#). Suppliers' compliance with relevant UK policies is monitored via a programme of internal audits.

Effective incident management ensures a proportionate approach to determine prevention, business improvement and compliance.

1.1 Definitions

HSE: Health, Safety and Environment

Appropriately trained: Persons who have been trained and their competence assessed to determine they have a suitable level of expertise to carry out defined activities.

Beyond Vodafone Control: All appropriate management controls were in place and it is proved that there was nothing more that Vodafone could reasonably be expected to do to prevent the incident.

Corrective Action: Improvement to eliminate causes of non-conformities or other undesirable situations.

HiPo: High Potential Incident.

Incident: Any event which could or does result in a loss i.e. injury, property damage or business interruption.

Independent expert: is an individual or company with training and substantial experience in the investigation of work related incidents who can investigate the incident, prepare a suitable report and recommend appropriate actions.

Responsible Person: Person assigned with responsibility for overseeing implementation of agreed corrective actions.

Significant Harm: circumstances requiring more than just first aid attention e.g. professional medical treatment, hospitalisation, major injury etc.

Work Related includes:

- All activities carried out as part of normal operations of the company, including work conducted by contractors / suppliers.





- Activities outside normal working hours where attendance is not optional e.g. team building events, offsite briefings or other mandatory company led events.
- Acts of physical violence against an employee whilst undertaking their work activities.
- Any travel on company business. This is inclusive of all travel in vehicles used as “tool of trade” e.g. sales agents and engineers travelling to, from and between sites.

1.2 Classifications

Classification	Description of Outcome
A Fatality	<ul style="list-style-type: none"> • Work Related Fatality
A Major Accident is any incident that results in:	<ul style="list-style-type: none"> • Any injury requiring admittance to hospital for more than 24 hours • Fractures, other than to fingers, thumbs or toes • Amputation • Dislocation of shoulder, hip, knee or spine • Loss of sight (temporary or permanent) • Chemical or hot metal burns to eye, or penetrating injury to eye • Any incident resulting in unconsciousness or requiring resuscitation • Significant harm arising from substance inhalation, ingestion or absorption, or exposure to a biological agent, • Serious burns requiring professional medical attention, • A vehicle collision where major injuries were sustained to one or more of the people involved (major injuries are those listed in the points above).
High Potential incident is an incident that does not necessarily result in injury, but has the potential to do significant harm.	<ul style="list-style-type: none"> • Significant loss of process • Major cost for repair or reinstatement • Collapse, overturn or failure of lifting machinery • Electrical short circuit or overload causing fire or explosion • Collapse or partial collapse of any structure • Explosion or fire causing suspension of normal work for over 24 hours • Plant or equipment coming into contact with overhead power lines • Any Utility Strike • Any unintentional explosion, misfire, failure of demolition to cause the intended collapse or projection of material beyond a site boundary, • A motor vehicle incident resulting in damage to the vehicle and/or minor injuries to any person and/or there was a loss of control of the vehicle, (unattended and/or unoccupied vehicles are excluded) • A breach of Vodafone Absolute Rules • Any electric shock or electrical burn whether or not it caused injury • Work related assault which does not result in major injury • Unintended collapse of any building or structure under construction, alteration or demolition material, a wall or floor in a place of work, any falsework • Any other incident which does not result in a major injury but requires treatment by a medical professional or attendance to hospital but does not require admittance for more than 24 hours • An incident that has the potential to cause pollution to the environment or a breach of environmental legislation (not in global policy)
A Minor Incident is an incident or accident that resulted in:	<ul style="list-style-type: none"> • Incident requiring First aid treatment only, • Minor cost for repair or reinstatement, • Partial disruption to a process.
Occupational health illness is	<ul style="list-style-type: none"> • A specific illness/condition, which was diagnosed by a competent medical practitioner as being caused, or exacerbated by, the work environment or work activity.





A Near Miss Incident is	<ul style="list-style-type: none"> Any undesired event or incident where No loss has occurred.
Lost Time Incident	<ul style="list-style-type: none"> A Work Related incident which prevented the individual coming to work the next day(s)/shift(s). Note: lost time on the day of the incident is not included in this category
An Environmental Incident is	<ul style="list-style-type: none"> any incident which results in release of pollution or damage to the environment, including nuisance impacts on neighbours including: complaints from neighbours relating to noise or other types of nuisance, unauthorised emission of black smoke from standby power generators, accidental release of refrigerant during network maintenance, spillage or leakage of diesel or chemicals on to the ground or into surface water drains during delivery, transfer or normal operations, unauthorised disposal of special wastes, excavated spoil or de-installed communications equipment, damage to sites of designated ecological or archaeological importance through incorrect working methods.

1.3 Information

For further information contact the HSE Team: hse.helpline@vodafone.com

2. Policy controls and requirements for compliance

General Requirements

- The first priority at the scene of incident is to ensure the welfare and safety of the injured person(s) and to make safe the area,
- Incidents should be reported directly to the **line manager or supervisor** who is responsible for the location or activity in question by the quickest means possible,
- Contractors shall report in accordance with the [UK Safety Supplier Policy](#)
- In the event of an incident, those in control of the work activity are to apply appropriate restrictions, to protect persons and environment from further harm,
- All Fatal incidents are to be reported to Group HSW within 24 hours,
- All High Potential (HiPo) and Major Accidents must be reported to Group HSW within 48 hours.

Process Requirements

- Reporting the incident and providing available detail as appropriate,
- Escalate HiPo, Major and Fatality Incidents,
- Triage the incident, verifying key information to determine any onward investigation requirements,
- Undertake an investigation, as appropriate, to determine underlying causes and preventive measures,
- Determine any key learning for promulgation within the business,
- Action Management to ensure effective close out and improvement.

2.1 Reporting the Incident

Incidents require reporting as soon as possible after the event following any necessary remedial actions.

Incidents may be reported by contacting HSE.Helpline@Vodafone.com / 03333 04 6666 or by logging them directly onto the [online incident reporting system](#).

Incident reporting should contain as much relevant information as appropriate. The level of detail and evidence collated will support the triage of the incident to determine the appropriate next steps.





2.2 Escalating the Incident

Any Fatality, Major or HiPo incident must be escalated immediately to the Head of Property (generally through the Senior Health and Safety Manager) to enable any onward escalation and/or risk and legal management.

These escalations will be undertaken immediately through the [online incident reporting system](#) or by phoning the Property Help Desk 03333 04 6666 which is available 24/7.

2.3 Triage of Incident Reports

Upon receiving a report of a HSE incident the HSE Team will undertake the following:

- Verify the incident, confirming classifications and respective details as required by online incident reporting system
- Review the incident to determine the need for any escalation or external reporting, as appropriate,
- Assign the incident to an appropriate person for review, investigation or closure.

Investigations, if applicable, must be proportionate to the severity or potential severity of the incident. Factors that will influence the requirement for an investigation are:

- severity or potential severity of harm (injury/impact),
- cost of recurrence,
- circumstances not easily understood,
- regulatory interest, and
- risk to reputation.

Note: this list is not exhaustive.

In some cases, the triage will reveal 'well understood' failures and conclude no benefit or value added for further scrutiny. In these cases, the closing statement and justification for no further investigation will be recorded within the incident management system.

During the triage, it may be prudent to identify actions without the need for any further scrutiny or investigation. Typically, these actions may relate to either a remedial action (repair), an obvious improvement or whereby an additional management review is required to determine a benefit.

2.5 Investigations

The HSE team will ensure that the competence of the investigator is appropriate for the complexity of the incident. Investigations will retain the appropriate 'sign off' to ensure a suitable and sufficient investigation (governance).

When the need for an investigation has been determined, it will consider:

- scope of the investigation,
- stakeholders,
- timeline for completion,
- any interim reporting requirement, and
- wider issues, taking a holistic approach, if applicable.

For HiPo, Major and Fatal incidents, investigations must be undertaken within 20 working days in accordance with Global Policy.

2.6 Action Management and Key Learning

Recommendations will be discussed with key stakeholders and actions agreed in a timely manner.

Actions need to be clear and unambiguous, if appropriate, broken down into sub-actions including realistic timescales.

The investigator and/or HSE team will record the action and monitor accordingly.





The investigation will consider the key learning, which could be a lesson learnt with the potential to benefit the wider estate, this could be managed as follows:

- an action accepted by a stakeholder to implement across the estate, or
- a key learning point prepared for dissemination, monthly briefs, forums consideration, workplace etc...

Note: Informal discussions may have already occurred with key stakeholders as part of the investigation, some improvements or remedial works may already be in action. These should be recorded within the report and action management system.

3. Roles and responsibilities

3.1 All Employees have a duty to:

- Report hazardous situations and defects in premises, plant or equipment to their line manager / supervisor, or their Vodafone sponsor / contact point
- Report HSE incidents to as per S2.1
- Provide accurate information and evidence (including photographs, as appropriate) that will support any investigation.

3.2 Line Managers have a duty to:

- Ensure incidents are reported and escalated as appropriate (see S2.1 & S2.2)
- Assist with the investigation when required
- Ensure remedial actions for the safety of their team are put in place, and
- Ensure all incidents, including near misses, are reported and discussed within team meetings.

3.3 Suppliers working on behalf of Vodafone are responsible for:

- Systems to ensure that all HiPo, major and fatal incidents (escalations) are reported to Vodafone as soon as possible and within 24 hours.
- In the case of enforcement visits or actions, ensure escalations are undertaken (HSE.Helpline@vodafone.com / 03333 04 6666).

3.4 The Health and Safety Team will:

- Provide a system for reporting of incidents and ensuring that appropriate records are kept in accordance with Vodafone UK Data Retention Policy or for 40 years for Occupational Health incidents,
- Triage incidents and investigate, as appropriate,
- Ensure appropriate documentation is retrieved, recorded and stored in a secure way,
- Comply with the reporting and investigation requirements of Group Policy Standard S02 Health & Safety Incident Reporting and Investigation [Global Policy Incident Reporting](#).
- Notify the Vodafone Risk, Insurance & Legal Teams of any accidents that are or likely to be subject to a claim against Vodafone insurance policies,
- Create appropriate performance information for Vodafone Group, Vodafone UK as a whole or for business functions as required, identifying KPIs to be issued on a monthly basis.
- Where necessary communicate results of Health, Safety and Environmental incidents to colleagues to increase awareness, prevent recurrence and help actively engage the workforce in the management system, e.g. workplace, monthly bulletins, toolbox talks.

4. Exceptions

Any exception or exemption to the controls set out in this document must be agreed by the health and safety team by contacting hse.helpline@vodafone.com





5. Supporting Documents

These detailed policy requirements are made under the [Vodafone UK Health, Safety and Wellbeing Policy](#).

Useful relevant documents include;

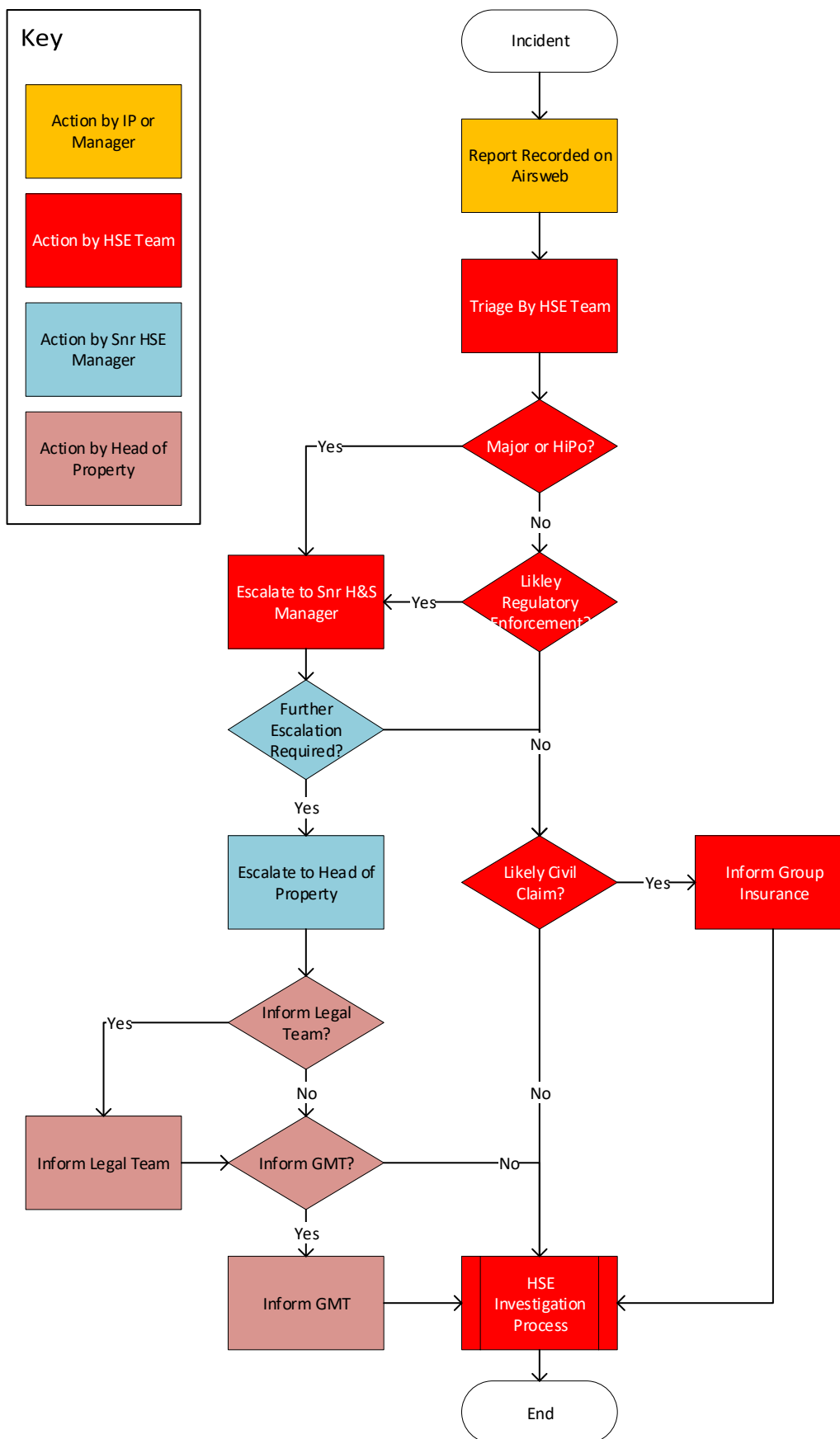
- [VPC Supplier Health & Safety Policy A3](#)
- [Global Policy Incident Reporting](#)
- [UK Safety Supplier Policy](#)

6. Document history

Version	Date	Changes	Other standards affected	Approved by
1.0	May 2019	New Document	None	Eileen Roddis
1.1	Jan 2020	Addition of HSE to scope, title and definitions. Correction of error in appendix 'B'. Addition of new VF Group HiPo definitions to 1.2	None	Alex Clark
1.2	July 2020	Updated links	None	Sharon Stanford
1.3	November 2021	Updated links	None	Sharon Stanford
1.4	April 2022	Links, wording, and references updated.	N/A	Alex Clark



7. Appendix A – HSE Incident Escalation Process





8. Appendix B – HSE Incident Investigation Process

