



Corporate Policy on Health & Safety
Date : January 2004
Version : 1

Subject :	Corporate Policy on Health & Safety
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Summary	
Arial 12 - Summary of policy to enable the reader to ascertain relevance to their role and responsibilities. This template should be used in conjunction with the document numbering scheme described in the Corporate Document Management Policy CG_POL_005.	
Contents	
1.	OBJECTIVES.....2
2.	SCOPE.....2
3.	DEFINITIONS & ABBREVIATIONS.....2
4.	REFERENCES/RELATED DOCUMENTS.....2
5.	HEALTH & SAFETY POLICY STATEMENT.....2
COMPANY ORGANISATION & ARRANGEMENTS FOR H&S	
6.	MANAGEMENT SYSTEM.....4
7.	MANAGEMENT RESPONSIBILITIES.....5
8.	REVIEW, AUDIT & COMPLIANCE.....8
APPENDICES	
A.	TASKS & RESPONSIBILITIES.....9
B.	STRUCTURES.....13
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Revision record

Issue	Date	Review	Prepared by	Reviewer	Custodian	Details
Draft	Dec 03	Jan 04	JAS Hunter	HSEPR	AT Norman	Previously issued as: LE Group HS&E Policy LEG-HSE-CP-01 Issue 2 Dated Feb 2003
1	Jan 04	Dec04	JAS Hunter	HSEPR	AT Norman	Initial issue as: EDFE-HSE-CP-01

1.0 Objectives

The Corporate Policy on Health & Safety is a component part of EDF Energy's Management System and is directly derived from EDF Energy's Corporate Governance.

The objective of this document is:

- To set the general direction for health, safety and welfare throughout EDF Energy
- To demonstrate senior management commitment to health & safety (H&S)
- To outline the details of the EDF Energy corporate governance framework for H&S policy-making, planning and implementation
- To meet the requirement of Section 2(3) of the Health and Safety at Work etc Act 1974 for a written statement of the EDF Energy General Policy on Health & Safety
- To state EDF Energy's commitment to consistently meet and exceed the requirements of H&S legislation
- To communicate the H&S duties and responsibilities of the EDF Energy Board, Chief Executive Officer (CEO), Board Directors, Chief Operating Officers (COOs), Managing Directors (MDs), Managers and staff
- To reflect the approach outlined in the Health and Safety Executive publication, 'Successful Health and Safety Management' HS(G)65.

2.0 Scope

This policy applies to EDF Energy plc and its Business Entities.

3.0 Definitions & Abbreviations

"CHSEC" means Company Health, Safety & Environment Committee.

"EDF Energy" means EDF Energy plc and its Business Entities.

"H&S" means Health & Safety.

"HESEC" means Health, Safety & Environment Committee.

"HS&E" means Health, Safety & Environment.

"HSEPR" means Health, Safety & Environment Policy Review Committee.

"Business Entity" means EDF Energy Directorate, Branch, Subsidiary, Business Group or Business Unit.

4.0 References/Related Documents

This Health & Safety Policy is a constituent part of EDF Energy's Corporate Governance Policy Framework, and contributes to the Company's Management System.

- EDFE-HSE-CP-02EDF – Energy Corporate Policy on Environment.
- EDF Energy Health, Safety & Environment Policies and Procedures.
- Health & Safety at Work etc Act 1974.
- Health & Safety Executive publication 'Successful Health & Safety Management' - Second Edition 1997 - HS(G)65 - ISBN 0-7176-1276 -7.
- Health & Safety Commission publication "Directors Responsibility for Health & Safety" INDG343.

EDF Energy plc- Health and & Safety Policy Statement

The EDF Energy plc Board have ultimate responsibility for health and safety within the Company and its Business Entities. I and my management team within EDF Energy are actively committed to the continuous improvement of Company standards of health and safety at work. Our people are the Company's key resource and their

health, safety and welfare are central to our values. We believe that our employees should be well trained, competent and responsible. By maximising their wellbeing and ensuring their participation and consultation, we will ensure that our employees are instrumental in helping us to achieve and maintain a safe and healthy working environment.

Compliance with legislative requirements is unequivocal but we view legal requirements as no more than a starting-point and recognise that health and safety shortcomings have a direct impact on an organisation's 'bottom line'.

Minimising risk to persons, to plant and equipment, and to the work process, is central to our business objectives. We are committed to preventing injury or harm to persons through our activities and to reducing work-related illness or injury to a minimum. We know that maintaining the highest standards of health and safety will contribute directly to our business performance overall and enhance our reputation.

We are committed to achieving best practice in assessing and minimising any risk to health and safety of any person and shall encourage our Partners, Clients and Contractors to provide the necessary support to meet this objective. Health and safety issues are taken fully into account in our corporate and business decisions year on year with adequate resources and funding made available for health and safety purposes.

Management has the prime responsibility for putting in place the organisation, systems and procedures necessary for proper assessment and control of risk associated with the business. This belief is a cornerstone of our commitment. We shall encourage working in partnership with our Contractors to ensure contracted activities are managed effectively and with our Customers and Clients to ensure the same of our services.

We are committed to implementing and operating a management system through progressive improvement that will enable us to:

- Set and continually develop appropriate policy
- Create the organisation necessary to achieve our policy objectives
- Plan how to achieve those objectives
- Implement those plans
- Maintain effective systems of communication with regards to health and safety issues
- Continuously measure achievement
- Audit and review the cycle as a whole at least annually.

I require that all EDF Energy staff, our contractors, agents and visitors comply and co-operate with the requirements of our policies and procedures and carry out their activities in a manner that will contribute to and assist with the provision of a safe and healthy working environment.

Vincent de Rivaz
Chief Executive
On behalf of EDF Energy Board, Jan 2004

5.0 Company Organisation & Arrangements for Health & Safety

- 5.1 The EDF Energy Board has overall responsibility for the annual review, development, approval and issue of this general statement of policy on health & safety.

The Board is committed to continual review of H&S performance and the degree of success in implementing plans to achieve Company objectives. The Board has established a Company Health, Safety & Environment Committee (CHSEC) (chaired by the Chief Executive) to advise on the discharge of health and safety responsibilities and direct the implementation of the health and safety process within EDF Energy. The CHSEC will review H&S performance and report to the Board on significant H&S failures, remedial actions and the effectiveness of the H&S management systems to monitor and measure H&S performance.

- 5.2 As the appointed Chairman of the EDF Energy Health, Safety & Environment Policy Review (HSEPR) Committee, the Managing Director of Generation has responsibility for co-ordinating the formulation and issue of Company-wide health & safety policy and procedures and for the ongoing review of health & safety performance. The Chairman of the HSEPR sits on the CHSEC and provides detailed reports of H&S performance and progress. The HSEPR is responsible for the ongoing development, maintenance and implementation of the EDF Energy Health & Safety Management System. This function is executed on their behalf by the EDF Energy HSE Working Group.

As Chairman of the EDF Energy HESEC, the Managing Director of ECS has responsibility at Company level for ensuring effective consultation with staff representatives on matters of joint interest concerning health & safety and for encouraging staff involvement in the achievement of health & safety objectives. The Chairman of the HESEC also sits on the CHSEC and reports on matters arising at the Company HESEC.

Chief Operating Officers and Corporate Directors are responsible for ensuring a HESEC framework is set up for their Branch/Directorate and maintained within their Business Entities to ensure the effective consultation with staff representatives on matters of joint interest concerning health and safety and for encouraging staff involvement in the achievement of health & safety objectives.

- 5.3 Chief Operating Officers, Directors and Managers are encouraged (mandated in the case of subsidiaries) to adopt their own general statements of policy on Health & Safety for the Business Entity concerned. They are required to develop and implement detailed, annual Management Action Plans designed to ensure continuous improvement in the Business Entities they manage; report on and review their H&S performance; and to issue, periodically review and, when necessary, revise specific policy, procedures, rules and other forms of instruction relevant to their work activities.
- 5.4 Chief Operating Officers, Directors and Managers are further responsible for allocating the necessary resources; encouraging staff participation; and specifying policy and procedures for systematic monitoring of work practices.
- 5.5 Responsibility for health & safety extends through managers and supervisors to each member of staff. Every employee is responsible for the proper implementation of Company and Business policy in the activities under his or her

control and for taking steps to ensure their personal health and safety and that of others.

- 5.6 We are committed to providing all the training required to ensure that management and staff have the necessary competence, knowledge and skills to work safely and without risk to health or safety of staff, stakeholders, contractors, visitors or members of the general public.
- 5.7 Effective means of communicating on matters regarding health & safety include the EDF Energy network of joint management/staff Health, Safety & Environment Committees (HESECs); access to the EDF Energy Legislation Register (available on the internet to all HS&E Managers), Toolbox Talks; and bulletins on specific issues distributed to the staff concerned.
- 5.8 The normal channel for any member of staff on a matter of health or safety at work is through his or her immediate supervisor. When that supervisor is not available, another responsible and appropriate person will substitute.
- 5.9 For professional advice on matters of health and safety at work, EDF Energy employs specialist HS&E Officers/Managers/Advisers and Occupational Health Advisers, with appropriate access to resources.
- 5.10 The following are among the matters for which EDF Energy makes specific provision, described in detail in EDF Energy HS&E Policies & Procedures:
- Hazard identification and the assessment of risk
 - The use, handling, storage and transport of articles and substances
 - The provision and use of protective clothing and equipment
 - The provision and maintenance of means of fire prevention and suppression
 - Active monitoring, planning, audit, review and reporting
 - The provision of First Aid in the event of injury or illness at work
 - The provision of adequate supervision and provision of competent expert advice
 - The reporting, investigation and analysis of injuries, diseases, dangerous occurrences and hazards - with recommendations made, communicated, implemented and monitored as appropriate
 - Occupational health risk management arrangements for
 - Ergonomics
 - Manual handling
 - Display screen equipment
 - Physical hazards
 - Chemical hazards
 - Mental health at work
 - Stress at work
 - Alcohol & drugs.

6.0 Management System

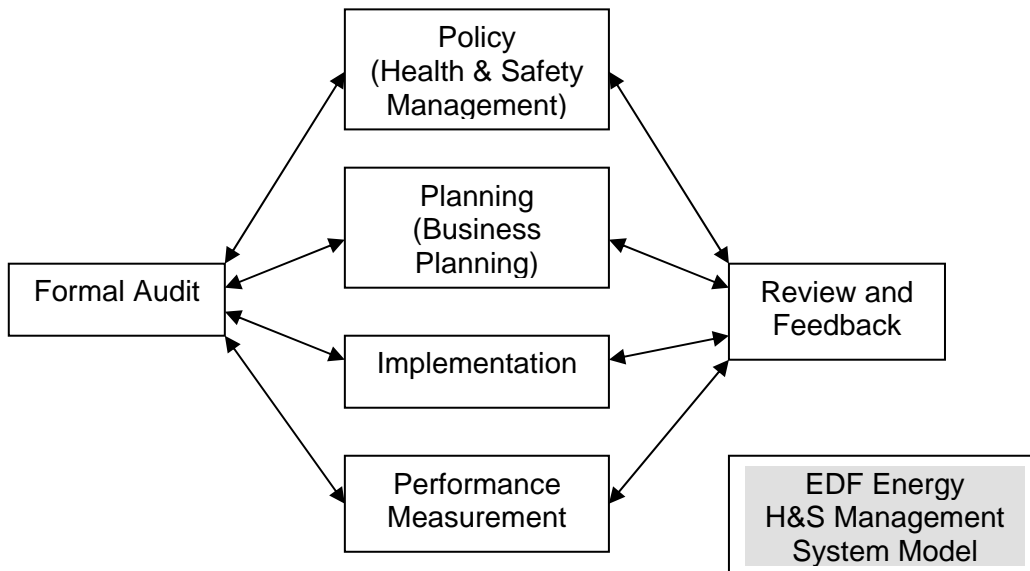
6.1 EDF Energy H&S Management System

The H&S management system is based on the principles of the Health and Safety Executive publications, 'Directors' Responsibilities for Health & Safety' INDG343 and 'Successful Health and Safety Management' HS(G)65 and is aligned to the requirements of OHSAS18001.

In conjunction with other related H&S policies and procedures, this Corporate

Policy on Health & Safety document sets out the general policy, organisation and arrangements for the Company and is a component part of the Company's H&S governance and H&S management system.

The objective of the management system detailed below is to enable EDF Energy to comply with the requirements of their health and safety governance and their policy statement for Health & Safety as outlined in HS(G)65.



6.2 H&S Management System Structure

The EDF Energy H&S management system is structured in 3 levels:

- Corporate Policy – Top level policies setting out organisation and arrangements
- General Policies – High level policies setting out the H&S governance framework
- General Procedures – Codes of Practice detailing Company minimum standards.

6.3 Elements of the Management System

The elements of the management system are described below:

6.3.1 Level 1 – Corporate Policy

An up-to-date statement of H&S policy outlining the Company's objectives and commitment to H&S with detailed organisation and arrangements for the management of health and safety throughout the Company. It describes the H&S governance structure, responsibilities for H&S and provides an overview of the management system.

6.3.2 Level 2 – General Policies

A suite of high level policies that set out the governance framework and provide the general requirements for the Level 3 procedures. These framework policies cover the subject topics of policy, organisation, planning, implementation, monitoring, audit and review.

6.3.3 Level 3 – General Procedures

These procedures are developed from the Level 2 General Policies and define the minimum standards to be employed throughout the Company. Business Entities have licence to develop their own procedures, but these must meet the requirements set out in the Company Level 3 procedures.

7.0 Management Responsibilities

7.1 Delegation of authority

The EDF Energy Board and Chief Executive have ultimate responsibility for all aspects of health and safety within EDF Energy plc and its various undertakings. Management responsibilities are delegated from the main EDF Energy Board as shown in the table at 7.2. Responsibilities are shown in relation to the elements of the management system described previously and further detailed in EDFE-HSE-GP-18 HS&E Management System Plan.

- 7.2 Responsibilities

Health and safety responsibilities within the Company lie with the following groups, full details of their responsibilities are at Appendix A.

Policy Makers

Policy Makers have responsibility for the formulation and development of policy and specifying the overall organisational framework, philosophy and implementation strategy.

Planners

Planners have responsibility for the planning of H&S strategy, targets and objectives and measuring auditing and reviewing H&S performance.

Implementers

Implementers have responsibility, within their remit, for implementing the requirements of the H&S arrangements, procedures, plans, controls, standards and work place precautions relevant to their activities.

Employees

Employees have responsibility for complying and co-operating with the requirements of the Company H&S Management System.

Advisers

The Company HS&E Officer and H&S Managers/Advisers have responsibility for providing professional advice on matters of health, safety and welfare.

Committees

The Company committee structure is at Appendix B.

	EDF Energy	Branch / Directorate	Business Entity	Committee
Policy Makers	EDF Energy Board, & Executive Committee	Chief Operating Officer/ Corporate Director & Executive	Managing Directors & Business Entity Executive	EDF Energy Company HS&E Committee (CHSEC)
Planners	Executive Committee & Branch Executives	Branch/Directorate Executive & Business Entity Managing Directors	Senior Management Team	EDF Energy HSEPR & EDF Energy HESEC
Implementers	Branch Managing Directors & Senior Management Teams	Business Entity Managing Directors & Senior Managers	Management Team & Supervisors	EDF Energy HSEWG & Business Entity HESEC's

Advisory	Company HS&E Officer HS&E Managers & EDF Energy Occupational Physician	Branch HS&E Manager & Occupational Health Adviser	Business Entity HS&E Manager & Occupational Health Adviser	EDF Energy HSEWG & EDF Energy Occupational Physician
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Board Responsibilities

With regard to health and safety responsibilities, the EDF Energy Board is required to:

- Nominate a Board Member as Chairman of the Company HSE Committee to report on Company health & safety issues
- Receive reports and reviews from the Company HSE Committee
- Reinforce the Company message on H&S practices through their actions, attitudes and decisions to publicly uphold the spirit of the Company H&S Policy
- Ensure Board decisions reflect the intentions of the Company H&S Policy and do not conflict with the Company's general H&S philosophy
- Promote and support employee participation and consultation in H&S matters.

Company HSE Committee

The Company HSE Committee shall:

- Receive regular reports and reviews of H&S performance from the HSEPR and Company HESEC
- Report to the Board on H&S performance, effectiveness of the H&S Policy and management system, major H&S failures and remedial actions
- Make suitable and sufficient provision for financial, material, manpower and H&S advice and assistance
- Regularly review H&S performance, including:
 - Significant H&S failures and the implementation and effectiveness of remedial action taken as a result of investigations
 - The effectiveness and suitability of the H&S management system for effective monitoring and reporting of H&S performance
 - The implementation of suitable and sufficient risk management processes throughout the Company
 - The H&S Policy to ensure it reflects current Board initiatives
 - Ensure H&S management system is subject to periodic audit to ensure the effectiveness and suitability of the system
 - Ensure Branches and Directorates implement effective monitoring and reporting of H&S performance
 - Communicate implications of Board decisions to Branches and Directorates.

7.4 Specific Responsibilities

Responsibilities for Policy Makers, Planners, Implementers, Employees and Advisers and organisation charts are appended to this Policy document.

8.0 Review, Audit & Compliance

To ensure the continued effectiveness and suitability of the H&S policy and related health and safety governance, the management system will be reviewed at least annually. The review will consider, as a minimum, legislative and regulatory change, industry 'best practice', recommendations arising from

incident investigations, progress against management action plan, results from audits, staff feedback and the effectiveness of training.

Compliance with the requirements of this policy and with relevant law and industry regulation will be subject to review by the EDF Energy Business Entity HS&E Managers on behalf of the EDF Energy Board or the Board's appointed agents who may include the Company Solicitor, Company Occupational Physician, Internal or External Audit.

H&S Management Systems will be audited in alternate years by accredited external auditors as a minimum.

APPENDICES:

TASKS & RESPONSIBILITIES		STRUCTURE	
A.1	Policy Makers	B.1	EDF Energy plc Structure
A.2	Planners	B.2	Company HS&E Committee Structure
A.3	Implementers		
A.4	Employees		
A.5	HS&E Officer/Manager/Adviser		

APPENDIX A

Policy Makers TASKS AND RESPONSIBILITIES

A.1 POLICY MAKERS

Policy Makers are responsible for:

- Devising H&S strategies to progressively enhance performance
- Establishing strategies to implement policy and integrate them into the general business activity
- Specifying a structure for planning, measuring, reviewing, and auditing the company's policy and H&S management system
- Specifying a structure for implementing policy and supporting plans
- Agreeing plans for improvement and reviewing progress to develop both the management system and associated policies
- Pursuing health, safety and welfare objectives with evident sincerity
- Making provision for suitable and sufficient financial, material and staff resources
- Ensuring that they and their subordinates have received suitable and sufficient training to ensure their competence for their duties
- Making provision for suitable and sufficient competent H&S assistance and advice
- Including an assessment of H&S performance in the Annual Report.

Major outputs from Policy Makers will include:

- Written statements of general H&S policy and strategic objectives
- Written statements of the organisation for planning, measuring, reviewing and auditing
- Written statements of the organisation for implementation
- General plans containing the specific objectives for each year.

A.2 PLANNERS

Planners are responsible for:

- Producing detailed plans to achieve corporate H&S objectives and progressively improve the H&S culture
- Establishing management arrangements, risk control systems and workplace precautions together with associated performance standards
- Co-ordinating specialist advice needed to ensure effective planning and implementation of policy, for example the input of H&S specialists, engineers, architects, occupational physicians and other medical specialists
- Establishing arrangements for measuring and reporting H&S metrics
- Ensuring adequate financial, material and staff resources are allocated
- Ensuring that they and their subordinates are suitably trained and competent for their range of duties and providing all necessary competence, knowledge and skills training
- Ensuring the participation and involvement of employees and their representatives
- Keeping up to date with changes to legislation, standards and good practice relevant to the organisation.

Key outputs from Planners will include:

- Local H&S Policy Statements for their Business Entities which are aligned to the Company policy
- H&S strategy statements to support the policy and enhance the H&S culture
- H&S operational plans which identify specific objectives to be achieved within fixed time periods
- Specifications for management arrangements, risk control systemsRCS(s), workplace precautions and performance standards
- Adequate arrangements for training, financial and physical resources
- Adequate arrangements for measuring and reporting H&S metrics
- Up-to-date information and documentation.

A.3 IMPLEMENTERS

Implementers are responsible for:

- Implementing operational plans, management arrangements and risk control systemsRCSs
- Providing the necessary financial, material and physical resources and information
- Providing of systems of work, plant and equipment, and workplaces which are safe and without risk to the health of any person
- Providing of suitable and sufficient competence, knowledge and skills training for staff
- Providing of timely feedback on performance including successes and failures and any deficiencies in plans, arrangements, systems or precautions
- Ensuring effective systems for communication and participation operate at all levels in H&S activities.

Key outputs from Implementers will include:

- Providing adequate financial, material and physical resources and information
- Production and delivery of products and services that in a fashion that is safe, healthy, without risk to health and meet the agreed and complies with requirements specification

- Products and services which in themselves do not create risks of harm, injury or ill health to others.

A.4 ALL EMPLOYEES

Employees are responsible, within their competence, for:

- Complying with the requirements of the Company's H&S Policy, Management System and procedures relevant to them
- Taking reasonable care of their own safety and that of others who may be affected by their acts or omissions at work
- Carrying out routine on-site risk assessments and taking any necessary action to remove, minimise &/or control risk, seeking assistance from line management when the necessary means of control is not available or inadequate
- Ensuring they do not use unauthorised or damaged work equipment or use work equipment for tasks it was not intended for or use work equipment they have not been trained on or are not competent to operate or authorised to use
- Using correctly, all work items provided to them, in accordance with their training and the instruction they receive to enable them to use the items safely
- Co-operating with the Company management in their efforts to comply with statutory duties for health and safety
- Shall notifying management of shortcomings in the H&S arrangements, procedures, risk assessments and/or risk control measures so that appropriate remedial action can be taken
- On no account intentionally or recklessly interfering with anything that has been provided for health, safety or welfare reasons for themselves or any other persons or in compliance with the requirements of H&S legislation
- Ensuring they do not tamper with &/or remove any safety device or guard fitted to work equipment or plant and wear the correct personal protective equipment for the task at all times
- Not consuming alcohol or partaking of any illegal drug or substance while on duty and complying with the requirements of the EDF Energy Alcohol & Drugs Policy and the associated 'for cause' testing.

A.5 Company HS&E Officer, Health, Safety & Environmental and Manager/Adviser and Occupational Health Adviser

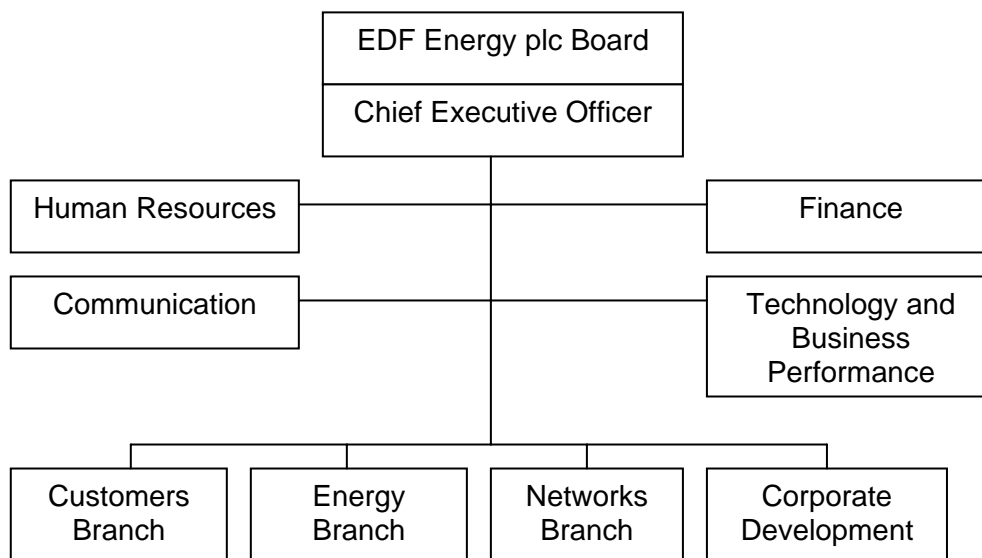
Company HS&E Officer, Health, Safety & Environmental Managers/Advisers & Occupational Health Advisers are responsible for providing advice to management and staff on the following:

- Formulating and developing policies for existing activities and with respect to future acquisitions and purchases
- Promoting a positive Company culture and secure the effective implementation of health & safety policy
- Planning for health, safety, environmental and quality including the the setting of realistic long and short term objectives, deciding priorities and establishing adequate systems and performance standards
- Day-to-day implementation and monitoring of policy and plans including accident and incident investigation reporting and analysis
- Reviewing and auditing the performance of the whole management system.

They shall also:

- Be properly trained and suitably qualified
- Maintain adequate information systems on, for example, civil and criminal law, health and safety management and technical advances
- Interpret the law in the context of their organisation
- Ensure that effective means of communication and consultation on health & safety issues exist within their sphere of operations
- Be involved in establishing organisational arrangements, systems and risk control standards relating to hardware and human performance, by advising line management on matters such as technical standards
- Establish and maintain procedures for reporting, investigating, recording and analysing incident, accidents and near misses/hits relating to possible failures or deficiencies of the management system
- Establish and implement a health and safety training programme
- Establish and maintain procedures, including monitoring and other means such as review and auditing, to ensure senior managers get a true picture of the way in which H&S is being managed. In this instance benchmarking may be particularly valuable
- Present advice on health, safety and welfare matters independently and effectively
- Co-ordinate and collate H&S data reporting from their Business Entities
- Submit monthly reports to HSEPR on H&S metrics
- Submit quarterly reviews of H&S performance to HSEPR.

APPENDIX B.1 EDF ENERGY plc - STRUCTURE



APPENDIX B.2
EDF ENERGY plc - HS&E COMMITTEE STRUCTURE

