



Vodafone Policy Detailed Requirements

HSE Incident Reporting and Investigations

Owner:	Champion:	Version:	Date:
David Fry	Eileen Roddis	Version 2.0	April 2023

Objective/Risk:	Scope
<p>This document addresses the risk that health, safety, and environmental work-related incidents that are not reported, investigated, reviewed and acted upon will be repeated and cause further harm.</p> <p>Application of the requirements will ensure consistent and accurate reporting and investigation of incidents.</p>	<p>Vodafone entities: This Policy applies to all Vodafone companies in which Vodafone Group hold an interest of 51%, or more, or management control. As a minimum, Branded Joint Ventures are to have HSW requirements which are equivalent to Vodafone’s HSW framework and standards. This policy does not apply to Branded Partner markets.</p> <p>Services: unless otherwise stated the policy applies to all services including but not limited to mobile, fixed and TV across both Consumer and Enterprise markets.</p> <p>People: this Policy applies to all Vodafone employees and Vodafone employed contractors.</p> <p>Suppliers: This Policy does not apply to Suppliers. Supplier reporting requirements are specified in the A3 Policy.</p> <p>More information? see our Policy compliance framework.</p>
<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.</p>	

Contents	
1. Roles and responsibilities	2
2. Definitions	2
3. Incident Classification	3
4. The Policy Standard	5
4.1 General reporting criteria	5
4.2 Determination of work relatedness	5
4.3 Lost time	6
4.4 Restricted work case (RWC).....	6
4.5 Incident Severity	7
4.6 Incident Response.....	8
4.7 Fatality review process	9
4.8 Beyond Vodafone Control.....	9
5. Supporting Documents.....	9
6. Document history	9



1. Roles and responsibilities

The Operating Company **CEO** is responsible for Operating Company's compliance with Vodafone Group Health & Safety policies and standards, including allocation of resources and accountabilities across business to meet this standard. The following Operating Companies and Functional roles are defined as follows:

The HR Director / Group Functional Directors are responsible for coordinating the effective implementation of this Standard and ensuring that adequate resources are available to ensure effective delivery of the requirements of this Standards in their areas of responsibility.

The **HSW Leader** is responsible for ensuring the implementation of the requirements contained within this standard within their Operating Company, and then ensuring adequate monitoring of compliance.

Line managers have responsibility for the health, safety, and wellbeing of those working within their area of operation and those who may be affected by the activities. They must ensure that adequate systems are in place to ensure delivery of Policy and Policy Standards and meet local statutory requirements.

Employees are responsible for following all rules and instruction provided and ensuring the health and safety who may be affected by their activities.

Group wide health, safety and wellbeing strategy and governance is managed and monitored by **Group Health, Safety & Wellbeing**, with the **Group Head of Health & Safety** reporting to the **Group Chief Human Resources Officer**.

2. Definitions

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 do to prevent the incident.

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

First aid treatment: Any treatment of minor scratches, cuts, burns, splinters and so forth, and any follow-up visit for the purpose of observation. The following are generally considered first aid treatment:

- a) Using a non-prescription medication at non-prescription strength regardless of route of administration, i.e., oral, injection, ingestion, inhalation, or absorption.
- b) Administering tetanus immunizations (other post exposure immunizations, such as Hepatitis B vaccine are considered medical treatment).
- c) Cleaning, flushing, or soaking wounds on the surface of the skin.
- d) Using wound coverings such as bandages, Band-Aids, gauze pads, etc. or using butterfly bandages, liquid bandage/surgical glue used to cover a wound, or Steri-Strips.
- e) Using hot or cold therapy.
- f) Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment).
- g) Using temporary immobilization devices while transporting an incident victim (e.g., splints, slings, neck collars, back boards, etc.).
- h) Using eye patches.
- i) Removing foreign bodies from the surface of the eye using only irrigation or cotton swab.
- j) Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs, or other simple means.
- k) Using finger guards.
- l) Drinking fluids for relief of heat stress or hypothermia

Incident: An occurrence arising out of, or during, work that could or does result in injury and ill health. An incident where no injury and ill health occurs, but has the potential to do so, is referred to as a 'near miss'.

Lost time: An injury or illness involves one or more days away from work.

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.



Medical treatment: Any work-related injury or illness requiring medical care. Medical treatment does not include first aid treatment (See First Aid treatment) even though provided by physician or registered professional personnel. For record keeping purposes Medical Treatment does not include:

- a) Visits to a physician or other licensed health care professional solely for observation or consulting.
- b) Diagnostic procedures such as x-rays and blood tests, including the administration of prescription medications used solely for diagnostic purposes, (e.g., eye drops to dilate pupils); or
- c) Any treatment contained on the list of first-aid treatments.

Occupational Health Related Illness: A work-related illness is one that is determined by a physician or licensed health care professional to have resulted from exposure to factors related to the employee's occupation and meets general recording criteria. For example: exposure to workplace chemicals, asbestosis, occupational dermatitis, heat stress, sun stroke, frostbite, etc.

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

Utility Services: Any services including gas, water, electric, fuel, sewage, communication

Work Related: An injury or illness is work-related if an incident or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness.

For more information see S4.2 'Determination of Work Relatedness'

Environmental incident: An occurrence or set of circumstances, because of which pollution (air, water, noise, or land) or an adverse environmental impact has occurred, is occurring, or is likely to occur, including nuisance impacts on neighbours.

3. Incident Classification

Classification	Description
Fatality	<ul style="list-style-type: none"> • Work related injury or illness that results in a fatality
Major Incident	<p>A work-related incident that results in:</p> <ul style="list-style-type: none"> • An injury causing incapacity for more than 7 days • 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 • Chronic ill-health • Collapse, overturn or failure of any lifting machinery or accessories • Collapse or partial collapse of any antenna supporting structure • Any unplanned contact with a utility service • Plant or equipment coming into contact with, or creating an arc with overhead power lines • Any electric shock or electrical burn
Minor Incident	<p>A work-related incident resulting in:</p> <ul style="list-style-type: none"> • No treatment injury • First aid treatment (see definition of first aid treatment) • Medical treatment (beyond first aid) (see definition of medical treatment) • Acute occupational illness, e.g., contact dermatitis.



Near Miss	<p>Any work-related incident where no injury and ill health occurs but has the potential to do so. Examples of a near miss include:</p> <ul style="list-style-type: none">a) Scaffold pole falls from heightb) Electrical short circuit or overload causing fire or explosionc) Collapse or partial collapse of any structure (excluding any antenna supporting structure – this is a Major Incident)d) Explosion or firee) Any unintentional explosion, misfire, failure of demolition to cause the intended collapse or projection of material beyond a site boundaryf) A motor vehicle incident resulting in damage to the vehicleg) Work related aggressionh) Unintended collapse of any building or structure under construction, alteration or demolition material, a wall or floor in a place of work, any falsework
Observations	<p>Unsafe acts are behaviours that can potentially lead to damage of property, personal injury, or death, e.g.</p> <ul style="list-style-type: none">a) Leaving pile of loose scaffold poles on top of scaffoldb) Speeding while drivingc) Walking while distracted by mobile technologyd) Tampering with or making safety devices inoperativee) Failure to use safe attire or PPE <p>Unsafe conditions are circumstances, environment, or state of equipment which could lead to an accident occurring, e.g.</p> <ul style="list-style-type: none">a) Pile of loose scaffold poles on top of scaffoldb) Inadequately guarded machineryc) Slippery, cracked floord) Poor housekeepinge) Inadequate lightingf) Adverse weather
Environmental Incident	<p>An occurrence or set of circumstances, because of which pollution (air, water, noise, or land) or an adverse environmental impact has occurred, is occurring, or is likely to occur., including nuisance impacts on neighbours e.g.:</p> <ul style="list-style-type: none">a) Break of limits/Licence conditionsb) Smoke/Fumes/Odoursc) Noise Nuisance/Light Pollutiond) Natural Environment & Wildlifee) Spillage/Leak/Loss of Containmentf) Spillage of Hazardous substancesg) Serious public/other complainth) Emissions to air of gasi) Contamination of Landj) Waste Management Failing



4. The Policy Standard

4.1 General reporting criteria

The Operating Company must record all work-related injuries, illnesses, and environmental incidents that meet the incident classifications listed in Section 3 on the global incident reporting system.

Only incidents classified as 'work-related' should be added to the online incident reporting system (See section 4.2 for further information).

The investigation must be proportionate to the actual severity and potential severity of the incident (see Sections 4.5 and 4.6 for further information).

4.2 Determination of work relatedness

An injury or illness is work-related if an event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness.

Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the work environment, unless listed in the exemption table below. The work environment is the establishment and other locations where one or more employees are working or are present as a condition of their employment. The work environment includes not only physical locations, but also the equipment or materials used by the employee during their work.

Work related activities also includes:

- a) Training that is required by Vodafone.
- b) Activities outside normal working hours where attendance is not optional e.g., team building events, offsite briefings or other mandatory company led events.
- c) Acts of physical violence against an employee whilst undertaking their work activities.
- d) 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.
- e) Certain vehicle Incidents:
 - Any crash involving a company, rental or personal vehicle while performing company business.
 - Work relationship is presumed for crashes resulting from business being conducted on behalf of the company while operating a company assigned vehicle. Examples of company business include:
 - Driving an employee or client to the airport, driving to the airport for a business trip:
 - Taking a client or work colleague out for a business-related meal.
 - Deliveries.
 - Visiting clients or customers or driving to a business-related appointment.

Personal business which **should not** be counted includes, but is not limited to:

- Running a personal errand.
- Getting a meal by yourself.
- A non-business meal with colleagues.
- Commuting to and from home, (including established home away from home).
- Driving to a personal medical appointment.

You are not required to record injuries and illnesses if . . .	
1	The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
2	The injury or illness results solely from voluntary participation in a wellness program or in a medical, fitness, or recreational activity such as blood donation, physical examination, flu shot, exercise class, tennis, or other sports activity.
3	The injury or illness is the result of the employee eating, drinking, or preparing food or drink for personal consumption. Note: An injury to a person assigned by the company to prepare food for company personnel is work-related
4	The injury or illness is the result of an employee doing personal tasks, unrelated to their employment, at the workplace



5	The injury or illness is the result of personal grooming, self-medication for a non-work-related condition, or is intentionally self-inflicted.
6	The injury or illness is caused by a motor vehicle accident while the injured is commuting to or from work.
7	Personal health e.g., cold or flu.
8	The illness is a mental illness. Mental illness will not be considered work-related unless the employee voluntarily provides the employer with an opinion from a physician or other licensed health care professional with appropriate training and experience (psychiatrist, psychologist, psychiatric nurse practitioner, etc.) stating that the employee has a mental illness that is work-related.
9	Following an investigation, the injury or illness is determined to have resulted solely from a pre-existing condition, which resulted in signs or symptoms surfacing at work, but were not caused by, exacerbated by, or cannot be linked back to a work activity
10	An injury that results from a natural bodily action or reaction such as walking or bending, coughing, or sneezing, that is unrelated to work.

Where it is not obvious whether the event or exposure occurred in the work environment or occurred away from work: the employee's work duties and environment must be evaluated to decide whether one or more events or exposures in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing condition.

Injuries and illnesses that occur while an employee is on travel status: are work-related if, at the time of the injury or illness, the employee was engaged in work activities "in the interest of Vodafone. Examples of include travel to and from customer contacts, conducting job tasks, and entertaining or being entertained to transact, discuss, or promote business (work-related entertainment includes only entertainment activities being engaged in at the direction of Vodafone).

Working at home / Remote working: injuries and illnesses that occur while an employee is working at home, including work in a home office, will be considered work-related if the injury or illness occurs while the employee is performing work for pay or compensation in the home, and the injury or illness is directly related to the performance of work rather than to the general home environment or setting. For example, if an employee drops Vodafone provided work equipment and injures their foot, the case is considered work-related. If an employee is injured because he or she trips on the family dog while rushing to answer a work phone call, the case is not considered work-related. If an employee working at home is electrocuted because of faulty home wiring, the injury is not considered work-related

4.3 Lost time

When a work-related injury or illness involves one or more days away from work, this must be recorded.

If the employee is out for an extended period, the number of days away must be added to the system when they are known.

Time away from work on the day of the incident is not considered in determining lost time. Time spent traveling, undergoing evaluation, awaiting medical evaluation results, or otherwise seeking medical treatment should not be counted as lost time.

If a physician or other licensed health care professional recommends that the worker stay at home, but the employee comes to work anyway, the number of calendar days away recommended must be entered.

If a physician or other licensed health care professional recommends that the worker return to work but the employee stays at home anyway, the count of days away from work on the date the physician or other licensed health care professional recommends must be entered.

When counting the number of calendar days, the employee was unable to work, weekend days, holidays, vacation days or other days off are included in the total number of days recorded if the employee would not have been able to work on those days because of a work-related injury or illness.

If the injured person comes back to work and consequently goes off sick again (related to that same incident), the lost days should be updated on the system.

4.4 Restricted work case (RWC)

When an injury or illness involves restricted work or job transfer but does not involve death or days away from work, this must be recorded.

Restricted work occurs when an employee cannot perform all their routine job functions but does not result in days away from work. A restricted work case occurs when, because of a work-related injury or illness:



- a) The employee is temporarily assigned to another job.
- b) The employee cannot perform all his routine job functions for all or part of their work shift.
- c) The employee works their regularly assigned job but cannot work the full shift.

Restricted or light duty on the day of the injury or illness does not make the incident a Restricted Work Case (RWC). If the employee continues under restricted duty the day after the incident, the case becomes a recordable Restricted Work Case (RWC).

Should an employee experience minor musculoskeletal discomfort such as muscle pains or strains and a physician or licensed health care professional determines that employee is fully able to perform all his routine job functions but the employer assigns work restriction to that employee or restricts the employee's job functions, for purpose of preventing a more serious condition from developing, the case is not recordable as a restricted work case.

4.5 Incident Severity

All incident classifications must be assessed for actual and potential severity and a rate applied using the table below.

Actual Severity is the severity of the incident in terms of the actual outcome of the event.

Potential Severity is the severity the of the incident in terms of the worst probable outcome, given the scenario. It is not simply the outcome suffered on this occasion, e.g., a tower collapse may not have caused any injuries, but had the potential to cause long term or fatal injuries.

Severity	Definition
4	<p>Fatality(ies)</p> <p>A major, persistent, extensive, or serious spillage or leakage which has or is likely to impact or cause damage to the Environment, people, or property.</p> <p>The spillage or leakage has entered the drainage system, topsoil/grass, or watercourses.</p> <p>The spillage or leakage could have:</p> <ul style="list-style-type: none"> persistent and/or extensive effects on water, land, and air quality. major damage to aquatic ecosystem (fish kill 100+). closure of the point at which water that is intended to be used for drinking is abstracted from the source water. major impact on amenity value, including facilities and services. major damage to agriculture and/or commerce serious impact on human health.
3	<p>Long term, life altering injury or illness resulting in permanent total or partial disability.</p> <p>Examples: amputation w/loss of bone, severe disfigurement, paralysis, loss of limb / organ / vision / hearing</p> <p>A spillage or leakage that covers a wide area that will require additional resource to clean, but one that will have no serious impact on the Environment, people, or property.</p> <p>A loss of F-Gas or other o-zone depleting substance to atmosphere of 500Kg or more.</p>
2	<p>Injury or illness requiring medical treatment or resulting in temporary disability or loss of function.</p> <p>Examples: deep laceration, object embedded in eye, bone fracture, concussion, dislocation, injury requiring surgery.</p> <p>A spillage or leakage of hazardous substances that would have a minor or minimal potential impact or effect on the Environment, people, or property. Very localised and requires only a localised clean with very limited resources being necessary. The substance is contained within a small, contained area or is confined to a hardstanding, with no possibility of entry into the drainage system, topsoil, or the Environment.</p> <p>A loss of F-Gas or other o-zone depleting substance to atmosphere between 50Kg and 499Kg.</p>



1	Injury or illness requiring first aid treatment only. Examples: minor cuts, bruises, sprains, strains, abrasions, irritation, inflammation, object in eye removed by flushing. A loss of F-Gas or other o-zone depleting substance to atmosphere between 10Kg and 49Kg.
0	No impact

4.6 Incident Response

The incident response is determined by the actual and potential severity of an incident. The requirements are as follows:

Actual Severity	Potential Severity	Protocol
0-1	1-2	Incident logged on reporting platform.
2	2	Incident logged on reporting platform. Investigation determined by local HSEW Team.
0-2	3	Notification to local HSEW Team. Investigation completed by local HSEW Team. Incident Alert discretionary.
0-2	4	Notification to local HSEW Team and HRD. Notification to Group Head of HSW within 24 hours. (Not required for environmental incidents) Incident Alert Required. Investigation completed within 20 working days of the incident. Corrective actions must be recorded and tracked using the Global Incident Reporting System
3	3-4	Notification to local HSEW Team and HRD. Notification to Group Head of HSW within 24 hours. (Not required for environmental incidents) Investigation completed within 20 working days of the incident. Corrective actions must be recorded and tracked using the Global Incident Reporting System
4	4	Notification to local HSEW Team and HRD. Notification to Group Head of HSW within 2 hours. (Not required for environmental incidents) Group Head of HSW to notify Group Exco. Investigation completed within 20 working days of the incident. For Actual Severity 4 a Fatality Review is completed. (Not required for environmental incidents) Corrective actions must be recorded and tracked using the Global Incident Reporting System

All incident investigations must define and record corrective actions that address the causes.

All corrective actions must be discussed and agreed with the appropriate level of management. All agreed corrective actions must be communicated and monitored through to completion by the person(s) identified as the Responsible Person(s) for the actions.

All Operating Company's must maintain suitable records of incidents, investigations, and corrective actions to ensure that all necessary measures are adequately completed and allow analysis to be undertaken



4.7 Fatality review process

All reported fatal incidents must be reviewed by Group to determine recordability.

Group HSW will support Operating Companies to ensure root cause is identified and the fatality review presentation covers sufficient detail to support a decision on recordability being made.

Once the fatality review presentation is ready a fatality review will be scheduled. Representation at this review as a minimum is as follows:

- Group CHRO
- Group Head of HSW
- Group HSW manager
- Operating Company HSW Leader
- Operating Company CEO
- Operating Company HRD
- Operating Company business area director or employer responsible for HSEW

4.8 Beyond Vodafone Control

Following a Fatality Review, if sufficient controls are demonstrated to have been in place and/or there is evidence to demonstrate the fatality was unforeseen, the investigation team may recommend to Group HSW that the accident be classified as beyond Vodafone control.

5. Supporting Documents

[Environmental Aspects and Impacts](#)

[Environmental Incidents & Spillage Response](#)

6. Document history

Version	Date	Changes	Other standards affected	Approved by
2.0	17.06.2023	Replacement of UK HSE Incident Reporting and Investigations Policy v1.4 with new version based upon Global HSE S02 v5. This UK version includes Environmental as well as health and safety incidents.		Alex Clark