

# GROUP HEALTH & SAFETY POLICY



**DO THE  
RIGHT  
THING**

**DCC**



# FINDING YOUR WAY ROUND

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# CHIEF EXECUTIVE'S INTRODUCTION



Safety is a core value of DCC. Nothing we do is so important that it cannot be done safely, every time.

Our goal is zero accidents and we must all make sure that we do not put ourselves, colleagues, contractors, customers or the wider public at unnecessary risk.

Excellence in Health & Safety is good for business and supports DCC's strategic objective of building a successful and sustainable business over the long term.

DCC is responsible for ensuring that our employees and those working on our behalf go home safe and well every day. To meet this responsibility, we will:

- as a minimum, comply with all applicable regulatory requirements and operate in accordance with industry codes of practice relevant to our businesses
- demonstrate the necessary leadership and provide sufficient resources to embed H&S considerations into business decision making at all levels
- implement effective H&S management systems and challenge ourselves to continually improve our performance by learning from events and adopting best practice
- look for innovative approaches to strengthen behaviours using the SAFETY F1RST communications programme as an engagement tool
- work with contractors and other stakeholders to ensure all H&S risks are appropriately managed
- foster an open culture that promotes engagement at all levels in the Group

If you are in any doubt about our H&S standards, always ask. If you have a concern, always raise it. You will always be supported for doing the right thing.

**Donal Murphy**  
Chief Executive

# WHO DOES THIS POLICY APPLY TO?

This Policy applies to all businesses of DCC plc and every business in which DCC plc has a controlling interest.

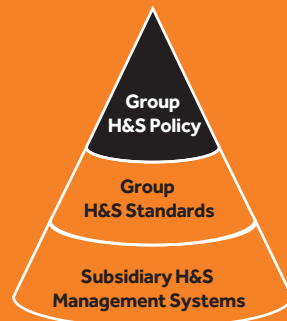
All references to "DCC", "Group", "the business", "we", "us", and "our" in this Policy can be read accordingly.

# WHAT ABOUT OTHER POLICIES AND PROCEDURES OR OTHER REQUIREMENTS?

This Policy supports DCC's devolved, autonomous business model by providing a high-level framework in which Health & Safety management systems continue to be developed and managed at subsidiary level.

More detailed policies, procedures and standards will be in place, whether across the Group, within individual subsidiaries or at third party sites. These operate in addition to this Policy: they add detail to the general principles set out here.

In some countries where we do business the law may have additional requirements to those set out in this Policy. If that is the case, then the legal requirement must be met. We must always work within the law.



# WHAT IS EXPECTED OF MANAGEMENT?

Directors and senior managers are accountable for H&S performance in the activities they direct and must:

- Have a clear understanding of this Policy and work to ensure it is implemented in both letter and spirit.
- Lead by example – always follow safety rules and raise a concern if something is unsafe.
- Actively engage in SAFETY F1RST programmes.
- Recognise good H&S performance by employees.
- Ensure H&S implications are considered in objectives setting and decision making processes within the business.
- Support a learning culture to continuously improve H&S performance.

# WHAT HAPPENS IF I DO NOT FOLLOW THIS POLICY?

Those who do not follow this Policy are subject to disciplinary action, up to and including dismissal. Examples of behaviour that may result in disciplinary action include:

- Deliberately breaching this Policy.
- Asking or encouraging others to breach this Policy.
- Failing to report a clear breach of this Policy.
- Retaliation against a person who has raised a concern.

Directors and senior managers are reminded that in many jurisdictions, significant criminal sanctions may apply to individuals in the event of a breach of H&S regulations.

# GOVERNANCE

## A. Management and Reporting

Managing Directors are accountable for H&S performance in their businesses. Performance metrics and commentary on significant H&S matters will be included in monthly reports at subsidiary, divisional and Group levels.

Qualitative and quantitative metrics will be aligned with the Expectations set out in this Policy to assess the trends in performance against desired outcomes.

## B. Assurance

Three levels of assurance are provided; business level audits, DCC Group H&S audits and external audits by regulators and other independent organisations. Group H&S audits will be completed to assess performance against this Policy, including the Expectations set out in the following pages. Audit actions raised will be monitored to ensure effective completion.

## C. Development

The Policy provides a framework for the determination and development of H&S standards within the Group. Standards can be technical in nature or define a best practice for carrying out a specific management activity.

Working Groups, drawing on internal and external expertise, meet regularly to share best practice, learn from events and develop standards in specific risk areas including process safety, transport safety and occupational health & safety.

A Steering Group oversees the activities of the Working Groups, including prioritisation of work streams and objectives.

# SAFETY FIRST

Engaging and communicating effectively with employees on occupational safety, health and wellbeing and process safety topics is an important part of leading and maintaining a positive safety culture.

SAFETY F1RST is our communications programme that underpins our commitment to H&S throughout the Group. The programme is built on two core principles: establishing safe behaviours and compliance with safety rules. Each business has the flexibility to develop SAFETY F1RST communication material specific to the risks and culture present within their workforce.

An on-line library of creative and effective SAFETY F1RST interventions and tools is available for use by individual businesses to share knowledge and good practice.



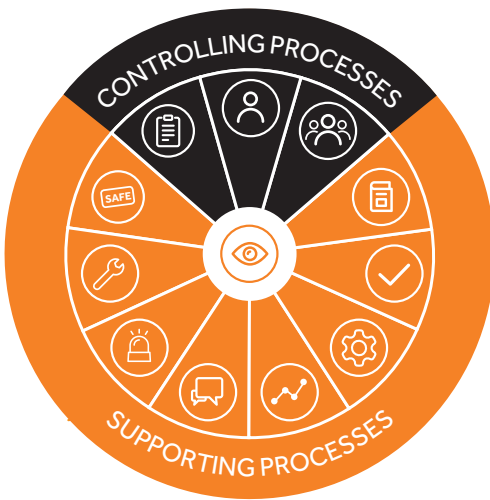
# EXPECTATIONS

Every Health & Safety management system follows a similar structure, often based on national, regional or international requirements.

The key processes in any H&S management systems are set out under twelve Expectations in this Policy. Business H&S management systems will be aligned to meet these Expectations.

Central to these Expectations is Risk Management for identifying, assessing and controlling H&S risks in the business. Surrounding Risk Management are three controlling processes and eight supporting processes.

The figure below provides a graphical representation of the Expectations.



- |  |  |   |  |   |                                  |   |                               |
|--|--|---|--|---|----------------------------------|---|-------------------------------|
|  | <b>1. LEADERSHIP &amp; COMMITMENT</b>  |  | <b>4. PEOPLE, TRAINING &amp; COMPETENCY</b>    |  | <b>8. LEARNING FROM EVENTS</b>   |  | <b>12. AUDIT &amp; REVIEW</b> |
|  | <b>2. PLANNING, ORGANISATION &amp; COMMUNICATION</b>                             |  | <b>5. COMPLIANCE &amp; KNOWLEDGE</b>           |  | <b>9. EMERGENCY PREPAREDNESS</b> |   |                               |
|  | <b>3. RISK MANAGEMENT</b><br>– Identify<br>– Assess<br>– Manage<br>– Demonstrate |  | <b>6. ENGINEERING &amp; PROJECT MANAGEMENT</b> |  | <b>10. ASSET MANAGEMENT</b>      |   |                               |
|  |  |  | <b>7. OPERATIONS &amp; PERFORMANCE</b>         |  | <b>11. CONTRACTED SERVICES</b>   |   |                               |





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## **EXPECTATION 1: LEADERSHIP & COMMITMENT**

**Management will provide visible and active leadership in developing and maintaining a supportive culture.**

- H&S goals and objectives will be identified, documented and communicated throughout the organisation.
- Management within each business will be clearly accountable for H&S performance, including the achievement of the identified goals and objectives.
- Management will demonstrate their commitment through their behaviours and actions.



## EXPECTATION 2: PLANNING, ORGANISING & COMMUNICATION

**The organisation and responsibilities for H&S management will be defined and documented.**

- H&S management systems will be clearly documented to ensure business processes and plans are communicated and understood.
- Structured management and group meetings will be used to communicate plans, actions and performance.
- Action tracking systems will be used to record actions and monitor progress to completion.
- Resources will be regularly reviewed to ensure they are adequate to achieve H&S goals and objectives.



**Hazards will be identified, the risks assessed and appropriate controls implemented.**

## **EXPECTATION 3: RISK MANAGEMENT**

- Formal processes will be established to identify the health, occupational safety and process safety hazards arising from current or proposed operations.
- Appropriate risk assessments will be performed and documented to identify risk control and mitigation measures.
- Risk assessments will consider the hierarchy of controls and where practicable preference will be given to inherently safer options (e.g. elimination, reduction) over those that need technical or procedural controls.
- Risk control and mitigation measures will be defined and documented.
- The risk control and mitigation measures will be monitored to ensure that they are functioning and effective.



## EXPECTATION 4: PEOPLE, TRAINING & COMPETENCY

**People will be selected, trained and developed to carry out their duties competently.**

- Processes and systems will include the means to identify required H&S accountabilities and competencies for employees, and will ensure that recruitment processes consider these requirements.
- Employee inductions will include H&S topics.
- H&S competence and capability of personnel will be developed and maintained using continuous training and development programmes.



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## **EXPECTATION 5: COMPLIANCE & KNOWLEDGE**

**Relevant managers will have access to the knowledge needed to effectively deliver compliance with relevant H&S legislation and regulations. Key information will be identified and organised for retention and retrieval.**

- Processes will be established to ensure that the business remains informed of relevant legislative and internal requirements, codes, standards and regulations relating to H&S.
- A document control system will be established to manage key documents and records throughout their life cycle.
- Retention policies will be defined for key documents and records.



## EXPECTATION 6: ENGINEERING & PROJECT MANAGEMENT

**Facilities will be designed, constructed and maintained to meet relevant codes of practice, applicable standards, operational needs and regulatory requirements.**

- A management of change procedure will be documented to cover organisational, technical and procedural changes which occur in a business due to a significant project or development.
- Project management procedures will be documented to cover the entire project management life cycle.
- Technical standards will be used to ensure that engineering changes and projects comply with the specific needs of the local conditions and with regulatory requirements.



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## **EXPECTATION 7: OPERATIONS & PERFORMANCE**

**All activities will have relevant, safe, secure and precautionary systems of work defined. Performance indicators will be established.**

- Operating procedures will be developed and maintained with appropriate employee input. Procedures will be clear, concise and consider abnormal and emergency situations.
- Safe operating limits of equipment will be defined and documented in operating procedures.
- Key H&S performance indicators, both leading and lagging, will be developed and monitored at subsidiary and divisional level.



## EXPECTATION 8: LEARNING FROM EVENTS

**Events will be reported and analysed to establish underlying root causes and prevent recurrence. The findings and recommendations of investigations will be communicated as appropriate to ensure the learning is shared.**

- A process will be defined to ensure that all events (including near misses, unsafe acts and unsafe conditions) are consistently reported and investigated based on their potential outcome.
- An end to end system will be in place to ensure root causes are identified, corrective actions taken and wider learnings communicated to support continuous improvement in H&S management systems.





## EXPECTATION 9: EMERGENCY PREPAREDNESS

**Arrangements will be made to ensure that sufficient resources are available to effectively manage and recover from emergencies and crisis situations.**

- Emergency response plans that consider events or crises with on and off-site impacts will be established and aligned with wider business continuity management plans.
- Emergency response plans will be tested to assess their effectiveness and updated as necessary.
- External bodies and agencies will be consulted during development of emergency response plans where their involvement may be required.



## EXPECTATION 10: ASSET MANAGEMENT

**Maintenance programmes will be established to ensure that physical assets are maintained in a condition appropriate to meet operational integrity requirements.**

- Asset registers will be established and kept up to date for each facility.
- Where applicable, process safety and safety critical devices and equipment will be specifically identified in the register.
- Policies, practices and procedures will be defined to ensure that assets are acquired, installed, maintained and inspected such that they are able to deliver the required operational and safety performance over their lifetime.
- Inspection programmes will consider the frequency and depth of inspection to reflect the risk associated with the equipment and to meet regulatory requirements.
- Procedures will be established for the eventual divestment or disposal of assets to ensure that any potential legacy issues and risks are addressed.



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## **EXPECTATION 11: CONTRACTED SERVICES**

**Contracted services will be managed to ensure that contractors deliver an acceptable level of H&S performance.**

- Systems will be established to ensure the effective management of contractor operations, including assessment, engagement and assurance.
- Only approved contractors will be used for any work which may have an impact on H&S standards and performance.



## EXPECTATION 12: AUDIT & REVIEW

**Audits and reviews will be performed to assess the effectiveness of the management system and to identify areas for improvement.**

- Senior management review meetings will be held periodically to examine the effectiveness of the H&S management system.
- A risk based audit programme will be established to ensure that all processes and procedures are examined at appropriate intervals.
- H&S performance will be assessed both qualitatively and quantitatively.
- Continuous improvement plans will be developed, based on performance outcomes.

# QUESTIONS OR CONCERNS

If you are unsure about how to apply this Policy in practice, please contact:

DCC Group Health & Safety Team  
[www.dcc.ie/responsibility/health-and-safety-team](http://www.dcc.ie/responsibility/health-and-safety-team)

# SAFECALL



Safecall are a business who provide an independent service allowing employees to raise concerns about legal or ethical issues within the business where they work. They are not part of the DCC Group.

This service is available 24 hours a day, every day of the year.

For more information on how to raise a concern please see pages 8 to 11 of the DCC Code of Conduct.

**You can use their website:**

[www.safecall.co.uk/file-a-report](http://www.safecall.co.uk/file-a-report)

**You can email:**

[dccgroup@safecall.co.uk](mailto:dccgroup@safecall.co.uk)

You will be supported if you raise a concern about a breach of this policy. Retaliation against a person who raises a concern is prohibited.







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