



The BEST Framework

EDF Group's Expectations for
Managing Health and Safety

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The BEST (Building Excellence in Safety Together) Framework sets out EDF Group's expectations for managing health and safety. These expectations describe what we all need to get right to achieve **industry-leading health and safety performance.**







LEADERSHIP
IN HEALTH &
SAFETY





The EDF Group BEST Framework



WORKING TOGETHER TO BETTER MANAGE
HEALTH & SAFETY AND INSTIL A GROUP-WIDE
CULTURE OF CARE AND CONSIDERATION





THE EDF GROUP BEST FRAMEWORK APPLIES TO EVERYONE:

- High-level framework of statements (across 8 key aspects of our operations), setting EDF Group's Expectations for excellence in health and safety management
- Comprehensively designed to raise the quality of health and safety management across EDF Group
- Each part of EDF Group – including contractors and suppliers – must ensure their arrangements comply with the BEST Framework and integrate in their improvement plans the actions required to reach this level of health and safety excellence.



Why do we need to complete our health and safety programme?

Because we're still seeing far too many accidents at work – and we want to completely eradicate fatal incidents across EDF Group.

The issue of health and safety is all around us, on all sites, at all times. We need to emphasise the critical importance of this aspect of our everyday work and Group-wide operations to every employee at every opportunity, using every touchpoint.

To keep our employees, contractors, customers and communities safe from harm, we need to instil a culture of care and consideration that trickles down through every level of our organisation – from the very top. Health and safety has to become a major commitment for the Group and an essential component of its future.

Our enduring priority is to continue to drive towards Zero Harm. To achieve this, we must all – from senior leadership positions downwards – come together to embrace and embed every aspect of excellence in the management of health and safety. This must be implemented top down, ground up, Group-wide.

Our new EDF Group BEST Framework, developed through joint working with members of the EDF Group health and safety community and the EWC Health and Safety Working Group and established from best practices collected from across EDF Group, will give everyone the essential structure to do just that. The BEST Framework sets out what we all need to get right to achieve industry-leading performance.

Importantly, the 8 elements of this new framework are spearheaded – both visually and in practice by 'Leadership in Health and Safety'. With resolution and reinforcement from senior managers at every step, we can come together to achieve our health and safety ambitions while also delivering our CAP2030 strategic vision.

Strong visible managerial leadership and collective mobilisation is essential to achieving sustained improvements to the health and safety of employees, contractors and members of the public who may be affected by our activities.

Leadership is understood here as the ability of the manager to influence behaviour so that it becomes safer. However, it's important to keep in mind that leadership in this context is not the exclusive domain of management. Other leaders, notably trade union representatives, project managers, experts or senior staff members and in-fact anybody can influence behaviour and demonstrate leadership in health and safety. Although their influence is different and complementary to that of the hierarchy, each person must play their part in improving health and safety and feel a collective responsibility to do so. Health and safety will be treated as an enduring priority and will always be put first in decision making.

1

LEADERSHIP IN HEALTH & SAFETY

1.1 Be accountable for health and safety of employees, contractors, subcontractors and visitors.

1.2 Create a health and safety vision that is coherent with the values and principles of management and formalise it in a Health and Safety Policy statement; regularly reviewed, signed-off and communicated with all employees, contractors and suppliers.

1.3 Give health and safety its rightful place in the organisation; manage and oversee it on a daily basis ensuring that health and safety is treated as an enduring priority. Clearly define all roles and responsibilities, objectives and targets. Provide resources to establish, implement, maintain and improve arrangements for health & safety management.

1.4 Share the health and safety vision: influence, persuade and promote the flow of information through the hierarchy. Promote active involvement of employees and contractors, encouraging a culture of belief, motivation, individual and collective responsibility, participation and commitment.

1.5 Be credible and be a role model: be personally involved in the development and deployment of health and safety action plans, ensure that they are practical and suited to the needs of the situation on the ground. Maintain a questioning attitude and be willing to receive challenge.

1.6 Promote team spirit and peer to peer support; share good practice and develop a collective responsibility for health and safety matters. Leaders promote a positive culture of joint working between organisational management and employee representatives.



1.7 Be available on-site to observe, listen and communicate effectively. Organise and participate in health and safety visits involving employees, contractors and suppliers. Play an active role in incident analysis.

1.8 Acknowledge and positively reinforce good practice and apply a fair and just culture.

These expectations are based on ICSI guidance « Leadership in safety » written and published in 2013 by a working group including several EDF representatives. (www.icsi-eu.org)

Understanding operational experience from incidents is vital when striving for continual improvement in health and safety performance and culture.

Incidents are investigated proportionately to their actual or potential impact involving appropriate levels of management, contract partners and employee representatives to identify root causes and related actions to prevent re-occurrence. Learning is shared openly and a “fair and just” culture is nurtured.

2

INCIDENT MANAGEMENT

2.1 A system is defined and operated to **formally report and investigate incidents** involving employees, contractors and other third parties; lessons learnt are captured and communicated. A “fair & just” culture is nurtured to encourage a high level of incident reporting, including near misses.

2.2 Documented arrangements are in place to **manage the scene of any health and safety related incident**. The organisational, personnel, training, equipment and drill requirements are identified and routinely reviewed.

2.3 There are clear definitions regarding the **type of health and safety incidents** which should be reported locally, in addition to meeting EDF Group and legislative reporting requirements.

2.4 All personnel & contractors are well motivated and competent to report incidents according to company requirements.

2.5 Incidents are investigated to a proportionate level of detail **based upon the severity of actual and potential consequences**.

2.6 Incidents are investigated using appropriate methodology to **ensure the identification of root causes**. Conclusions are communicated within a defined timeframe and remedial actions are tracked to closure and reviewed for effectiveness. Preventive actions are related mainly to root causes.



2.7 Investigations are conducted by suitably qualified and experienced people who have received specific training in analysis techniques appropriate to the level of investigation conducted.

2.8 Multi-disciplinary investigation teams are used where actual or potential incident severity is high. Seniority of management involvement in investigations is commensurate with the severity of the incident. Investigations involve employee/contractor representatives.

2.9 Information relating to health and safety incidents, investigation conclusions and trend analysis is **shared widely across the organisation**, in particular with the staff representatives and the contractors concerned.

2.10 For very serious incidents and High Potential Events, initial event information and investigation recommendations to prevent re-occurrence are **shared across EDF Group**.

Working with high performing contractors and suppliers is key to overall business performance.

Organisations with mature health and safety systems and values work together with contract partners and suppliers to improve health and safety performance for all parties involved in operations. Effective management of contractors and suppliers ensures that the organisation's partners in business have the capabilities and competence to perform work or services in a manner consistent with shared health and safety values and performance expectations.

3

CONTRACTOR & SUPPLIER MANAGEMENT

3.1 A system is defined to formally **screen, evaluate, select, engage and manage** the relationship with contractors and suppliers. Sufficient competent resources are appointed for the management of contractors and suppliers in the organisation and responsibilities clearly defined.

3.2 A **risk-based approach** is used to classify contractors and suppliers, in order to define corresponding health and safety requirements and establish screening, evaluation and selection criteria.

3.3 Health and safety requirements are **shared** with contractors and suppliers **at the earliest possible stage**. Contractors are held accountable for ensuring their subcontractors comply with those requirements.

3.4 Selected contractors and suppliers are engaged through a contract that includes **specific health and safety terms and conditions**. In relation to the contractors and suppliers classification, appropriate sanctions are defined and applied in case of deviation or poor performance.

3.5 A **contract manager** – or a person acting as such – **is appointed** to monitor the execution of the work or services and to ensure health and safety requirements set in the contract are respected.

3.6 Systems are in place to ensure that contractors and suppliers **understand the health and safety requirements prior to commencement of work and services**. Contractors and suppliers are inducted, briefed or trained on relevant procedures, practices or specific hazards associated with the work or services they will undertake.



3.7 Health and safety performance of contractors and suppliers is monitored during planning and execution of the work or services, controls are in place to ensure that health, safety and well-being are managed effectively. **A culture of trust is nurtured** with contractors and suppliers through positive reinforcement and encouraging continuous improvement.

3.8 Systems are in place to **manage interfaces** between contractors.

3.9 Evaluation of contractors and suppliers is performed **upon completion** of the work or services **and on a periodic basis**, and evaluation results are documented. Feedback is provided to the contractor or supplier to improve future activities and is used as a basis for future selection.

3.10 Lessons learned from contractor and supplier activities **are systematically captured and shared** within the organisation and EDF Group, to provide a basis for **improving contractor and supplier selection and performance**.

Effective hazard identification and risk management is the first step of the health & safety process. Risk assessment is the process of identifying what might cause harm. Hazards are eliminated wherever possible as a first priority, if elimination is not possible reasonable preventive measures are put in place to ensure that the risk is reduced to a 'tolerable' level before setting people to work.

A tolerable risk is a risk that has been reduced to a level which is as low as possible without incurring excessive financial and resource costs which would be disproportionate to the benefits that further reducing the risk would provide. Residual risk is minimised by behavioural and human performance actions to reach our Zero Harm ambition. EDF Group is committed to doing everything 'reasonably practicable' to protect people from harm. This means balancing the level of risk against the measures needed to control the real risk in terms of money, time or effort. Action may not be necessary (unless there is a legal requirement), if it would be grossly disproportionate to the level of risk.

4

RISK ASSESSMENT & MANAGEMENT

4.1 A system is in place for the ongoing hazard identification, risk assessment and establishment of control measures.

4.2 Health and safety risk management is integrated into the overall business risk management programme.

4.3 Risk assessment is carried out by multi-disciplinary teams, involving managers, health and safety professionals, employees and their representatives.

4.4 Risk assessment methodologies are implemented to identify hazards and evaluate risks objectively, and to recommend control measures to reduce risks.

4.5 Workers at all levels of the organisation, including contractors and subcontractors are aware of the health and safety risks and control measures, including the Life Saving Rules.

4.6 Action plans are implemented to mitigate risks to tolerable levels and to report the risk status at appropriate intervals to the relevant stakeholders.

4.7 The results of hazard identification, risk assessment and the determined controls are documented.



4.8 Regular management audits and reviews of the risk assessment processes are held to **identify areas of improvement**.

4.9 Results of audits and reviews are used to **improve the process**.

Understanding current performance is crucial to driving continual health and safety improvement.

The collation and reporting of results, together with formal audits provides assurance of agreed performance and early warning of deviations. Senior management provide governance of health and safety arrangements to ensure ongoing effectiveness.

5

MONITORING & EVALUATING PERFORMANCE

5.1 A health and safety **governance structure is in place** to ensure the effectiveness of health and safety arrangements.

5.2 **Progress** towards achieving health and safety objectives and targets **is regularly reviewed**.

5.3 **Key Performance Indicators (KPIs) are established** and based upon key health and safety risk areas and operations.

5.4 Health and safety performance metrics are focused on leading measures. **Incident rate metrics are used only for entity level reporting.**

5.5 **Corrective and preventive action is undertaken** to address inadequate KPI performance.

5.6 **Health and safety assurance programmes are in place** within entity business areas.

5.7 All entity assurance programmes are devised and conducted by **suitably qualified, experienced and independent personnel.**



5.8 Performance is benchmarked across appropriate industry sectors and across EDF Group. **Best practice** in health and safety management is **identified and utilised** from internal and external sources.

5.9 Self-assessments and audits against the **BEST Framework** are undertaken in line with EDF Group requirements.

All people performing tasks under the control of the company must be trained to ensure that their job is executed without adversely impacting the health and safety of themselves or others. To achieve this, competencies must be identified and any gaps in knowledge or experience must be addressed.

Where appropriate, competencies should be recognised through accreditation or authorisation. Knowledge management is an essential part of sustaining effective health and safety management systems and culture. Employee health and safety awareness and engagement programmes are in place to raise organisation commitment to Zero Harm.

6

TRAINING & COMPETENCY

6.1 A systematic approach to training is described, embedded and regularly reviewed.

6.2 Requirements for health and safety competence are identified and realised.

6.3 A process for the management of accreditations and qualifications is defined and embedded within the entity.

6.4 Regular programmes to promote health and safety are in place to engage all employees and contractors with the Zero Harm ambition.



6.5/ Succession plans are in place for positions holding key responsibilities for health and safety management.

6.6/ Individual and collective experience and knowledge are captured and carefully considered when personnel changes are made.

Effective asset integrity processes support safe and reliable operation throughout asset life-cycle, including design, construction, operation, maintenance and dismantling. This is achieved through anticipation, identification, prevention, and prompt resolution of asset performance issues and degradations.

Assets are designed to meet externally verifiable criteria, using materials and equipment which meet all appropriate standards, including critical Health and Safety and operational integrity requirements. This element applies to all appropriate* assets owned and/or managed by EDF Group, and is linked to elements 6 and 8 which address more generic expectations for assets.

7

ASSET INTEGRITY

7.1 A **management system** is implemented to reduce to as low as reasonably practicable, potential impacts on the health and safety of employees, contractors and the public, **throughout the asset life-cycle**.

7.2 Health, safety and quality requirements for the design, construction, operation, maintenance and dismantling of the assets **are identified, available and up to date**. Emerging health, safety and quality requirements are identified **throughout the asset life-cycle**.

7.3 Any design and construction project of an asset includes a **health and safety management plan** aimed at reducing risks during all phases of the asset life cycle.

7.4 A **systematic review of operational readiness** is undertaken and documented prior to commissioning of any new or modified asset.

7.5 Every asset within the organisation is operated in accordance with **instructions and operating procedures** which take health and safety impacts into consideration.

7.6 A **maintenance programme** exists for all assets.



7.7 An **open reporting culture** ensures that asset integrity issues are readily reported, investigated and corrective measures are taken.

**The self-assessment material provides guidance on how to identify where this element applies.*

During the lifetime of operational activities, many changes will occur. These could be changes to the physical hardware of the installations, the hard and software operating the installations, the business processes or the organisation itself.

All changes (large, small, permanent, temporary, technical and organisational) are systematically reviewed to identify, assess and manage risks related to the proposed changes and to guarantee or improve Health and Safety arrangements. Many incidents across a wide range of industries have been caused by modifications to operating plant, installation, machinery, processes, procedures or organisation that have not been adequately assessed, authorised or communicated.

8

MANAGEMENT OF CHANGE

8.1 A Management of Change (MOC) process is in place which systematically identifies, assesses and manages risks arising from planned and unplanned changes.

8.2 The MOC process must clearly define when it is and is not applicable.

8.3 The MOC process clearly addresses a defined set of key elements.

8.4 Key roles in the MOC process must be fulfilled.

8.5 Key personnel involved in the MOC process are trained in the reasoning behind the procedure, the way it works and their specific responsibilities in the process

8.6 Temporary changes do not exceed initial authorisation for scope or time without review and approval.



8.7 The MOC process defines how **emergency changes** are managed.

8.8 The MOC process takes into account the consequences of unexpected change.

8.9 Regular management reviews of the MOC process are held to identify areas for improvement.