

SAFETY, HEALTH AND ENVIRONMENT RISK POLICY

Document Category	Policy
Document Title	SAFETY , HEALTH AND ENVIRONMENT RISK POLICY
Revision Number	Rev 2
Number of Pages	7
Effective Date	1 April 2014
Review Date	31 March 2017
Documentation Control	Refer to Section 11 of this Policy
Related Documents	Performance standards/management system; Safety Rules & Regulations. SHE best practice principles. SHE
Archive Reference Number	POL-CoS-07
Electronic Archiving Repository	Intranet /Policies/Human Resources

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1. Definitions

The definition of terms used in this Policy is given below in no particular order:

TERM	DEFINITION
BPC SHE Performance standards	Botswana Power Corporation safety, health, environment & risk management system.
Accident	An unplanned vent which results in damage to property or injury to a person-including physical harm and occupationally induced ailment.
Incident	Any unplanned event which has a potential to result in property damage or injury to a person.
Monitoring and review	A structured approach to measure extent of compliance to the policy requirements and reporting outcome thereof.
Management self-audit	A team of managers appointed by the CEO to conduct independent audits of BPC facilities to monitor compliance to SHE Policy and related procedures/standards.
SHE Appointees	Any employee who has formally been designated to carry out safety function /obligations in line with SHE standards e.g. SHE Representative, Ladder inspectors, scaffold inspector, lifting equipment inspector, first Aider, fire team member etc.
Risk assessment	The processes of evaluating the potential risks that may be involved In an activity or undertaking.
Risk	Any event which is likely to cause harm.
Legislative Provisions-SHE	Any Laws passed by Parliament intended to ensure SHE compliance
SHE Standards	Established BPC-SHE performance principles which are currently in force
Safety rules and regulations	Refers to the Mechanical, electrical safety rules and regulations currently in force
Contractors	Consultants, independent contractors, and agents retained by, or furnishing services to BPC for its own purpose
Employee	Any employee of BPC and Employees means all employees of BPC
Emergency Response	Plans that are prepared to manage the impacts of adverse or catastrophic events which

Plans	contemplate maintenance of emergency-ready trained personnel and the periodic testing of response performance
SHE Audit	A systematic review of activities through comparison of actual performance to defined criteria by individuals who are independent of the activities under review

2. Policy Statement

This Policy is intended as a clear statement that the Corporation will:

- 2.1. Provide all its employees with a work environment which will protect, maintain and foster employee safety and health.
- 2.2. Ensure that machines, equipment and assets are protected to ensure optimal utilization and sustainability.
- 2.3. Ensure that, each employee in accordance with his or her functions takes individual responsibility for doing whatever is necessary to achieve SHER compliance, adopted SHER performance standards and all applicable and relevant statutes.
- 2.4. Ensure development and implementation of SHER management system based on the management by objectives to facilitate and maintain consistent implementation of SHER standards.
- 2.5. Be committed to conduct its business operations by upholding best practices in SHER standards.
- 2.6. Promote and sustain a SHER performance driven culture.
- 2.7. The corporation commits to ensure proactive prevention of injuries, ill-health and environmental degradation. The Corporation further commits to ensure continual improvement on SHE performance across the board by ensuring among others reviewing SHE objectives and targets.
- 2.8. The corporation commits to ensure sustained capacity building programs to enhance SHE skills competencies across the board.
- 2.9. The corporation further commits to ensuring that SHE risk mitigation measures are Implement in accordance with best practice principles of hierarchy of control.

3. Scope

This Policy applies to all operations which Botswana Power Corporation owns or has full or partial control

regardless of geographical location. All employees, contractors/or subcontractors performing their duties for and within the Corporation premises must align their SHE programs to this policy.

4. Objectives

The objectives are to;

- 4.1 Ensure that all employees, contractors and visitors are sensitized on the potential risks arising from BPC's activities/or operations in order to prevent accidents and incidents which may have a detrimental impact on major stakeholders.
- 4.2 Inculcate a culture of risk awareness and a systematic approach to maintain safe systems at work.
- 4.3 Implement an integrated management system for environmental and occupational safety, health and fire protection throughout the Corporation.
- 4.4 Ensure a uniform SHE management system and conformance with BPC set SHE standards, minimum legislative provisions and best practice.
- 4.5 Develop and provide capacity building across all SHE disciplines.
- 4.6 Clearly define SHE structures through the SHE performance standards to ensure accountability across board.
- 4.7 Ensure consistency within BPC in the management of SHE performance.

5. Policy Principles

- 5.1 This Policy shall emphasise to all employees, as individuals and collectively, their responsibility for SHE performance. It should also ensure that employees have the necessary SHE competencies, authority and resources to perform their duties effectively and safely. The SHE organizational structure and allocation of responsibilities shall:
 - 5.1.1 Reflect the responsibility of Business Unit Directors and line managers at all levels, to develop, implement and maintain the SHE Management System (SHEMS), in their particular areas which shall be achieved through SHE appointments in line with the BPC's SHE management system.
 - 5.1.2 Different operating strategic business Units or strategic support Units, employees and contractors.
 - 5.1.3 Appoint SHE personnel train and assign them with responsibility, authority and accountability for implementation, co-ordination and maintenance of the SHE Management System. This will also

include setting objectives and targets to ensure focused attention by all SHE appointees and employees at large

- 5.1.4 The SHE appointees(s) shall be accountable to senior management, but the appointment(s) shall not reduce the responsibility of individual line managers for implementing the SHEMS in their areas.
- 5.1.5 Executive management shall allocate sufficient resources to ensure the effective operation of the SHEMS, taking into account advice from the Corporate SHE discipline professionals.
- 5.1.6 SHE Resource allocation shall be reviewed regularly as part of the Review of the SHEMS, this shall also include SHE regular system review by management at predetermined intervals and in accordance with SHE performance standards.

6. Application

This Policy applies to all employees, contractors, subcontractors performing duties for and within the Corporation premises/or operations.

7. Key Aspects of the Policy

7.1 Policy Enforcement

- 7.1.1 This Policy shall be enforced by line management with facilitation through the Corporate SHE Unit within the Corporate Service strategic Business Unit. Compliance to SHEMS shall be a collective responsibility. However, first line SHE compliance shall be the responsibility of line management while Corporate SHE shall play an advisory role only.
- 7.1.2 Unauthorized deviation from this Policy shall be regarded as a discipline matter, which will then invoke the disciplinary process in line with the relevant Section of this HR Policy Manual and other policy decisions.
- 7.1.3 Any employee aggrieved by any decision taken regarding the implementation of this Policy shall appeal through outlined processes as enshrined in this Policy Manual.

7.2 Risk Evaluation

The Corporation will identify and pro-actively manage all safety, health and environmental risks posed by its operations and major project activities through:

- 7.2.1 Identification of all the sources of safety, health and environmental risks in all BPC operations
- 7.2.2 Assessment and characterization of the potential consequences of safety, health and environmental related risks to employee, contractors, customers, communities and the environment
- 7.2.3 Evaluate the effectiveness of BPC SHE controls, including preventative and mitigation measures
- 7.2.4 The corporation shall employ the risk rating matrix adopted by the corporation to evaluate SHE

risks and ensure appropriate risk mitigation measures are implemented to prevent down grading Incidents.

- 7.2.5 Each business Unit Is required to conduct baseline SHE risk Audit and develop an action plan to mitigate against identified risks and hazards.

7.3 Training and Behavioural Skills

BPC Management shall support development of SHE procedures that will enable employees to work in a safe, healthy and environmentally responsible manner

The Corporation through Corporate SHE shall maintain SHE training plans for specific operations and job classes based on the inherent risk, compliance requirements and business requirements.

The Corporation shall furthermore ensure that employees receive the initial and refresher training and are competent to perform the required task before being appointed. Appropriate SHE capacity building records of training shall be maintained and refresher training scheduled as required.

7.4 SHE Emergency Response

Botswana Power Corporation will anticipate and plan for safety, health and environmental emergencies by maintaining emergency response plans. BPC shall ensure that the emergency response plans are accessible and current. Emergency Response plans shall be reviewed and independently tested to verify emergency preparedness. Each employee at all BPC operational sites shall be trained in emergency response and such exercise be documented. Emergency response plans shall also cater for all emergency scenarios including natural and man-made disasters. All Business Unit shall appoint emergency coordinators to facilitate emergency responses.

7.4 Third Party Relationships

BPC shall manage contractors to ensure that SHE performance is achieved and maintained at all times.

- 7.4.1 BPC through the SHE department shall communicate SHE qualifying criteria for all contractors
- 7.4.2 Evaluate the contractors' ongoing SHE performance as part of selection and approval to perform work
- 7.4.3 Request Contractors to manage their SHE risks and align to this policy
- 7.4.4 Review and assess Contractors SHE performance
- 7.4.5 Communicate with members of the public the risks associated with BPC equipment found in their communities
- 7.4.6 The Corporation shall regulate contractors SHE compliance through formal SHE obligations of parties to the contract including penalty clauses for violations of applicable SHE rules and statutory requirements.
- 7.4.7 Contractors are equally mandated to provide SHE system of work by ensuring compliance with the minimum legislative provisions and also must ensure establishment of SHE structures to facilitate compliance to SHE standards and regulations.

7.5 SHER Monitoring Structures

SHE monitoring shall be provided through internal SHE structures across the board, for example, from SHE appointees to management levels. This shall entail measuring performance against established BPC's SHE management system; monitoring shall include activities such as:

- 7.5.1 Regular monitoring of progress towards the objectives and targets achieved by implementation of BPC's SHE performance standards/plans.
- 7.5.2 Regular inspection of facilities, plant and equipment in line with the BPC's standards/management system.
- 7.5.3 Monitoring of critical activities and processes, in line with frequency/cycle as enshrined in the BPC's SHE management system.
- 7.5.4 Management SHE reviews shall be undertaken at predetermined intervals to ensure SHE compliance and effectiveness of the SHE programme
- 7.5.5 All Business Units shall be subjected to independent SHE system reviews by Corporate SHE Office to ensure sustained SHE performance across the Corporation.
- 7.5.6 The Corporation shall also conduct quantitative hygiene risk assessment very two years and develop an action plan to close identified deviations.

8. Roles and Responsibilities

- 8.1 The Board shall be responsible for approving the policy principles.
- 8.2 The Chief Executive Officer has a mandate to ensure that SHE obligations are discharged and has the overall accountability for ensuring that this policy is implemented.
- 8.3 Directors/General Managers shall be accountable for ensuring the effective enforcement, compliance, development and implementation of the SHE program that comply with the NOSA SHE management system through the integration of the SHE management In all their business operations and the provision of resources to achieve this.
- 8.4. Line Manager or Supervisors shall be responsible for SHE issues at work, i.e. the prevention of non-conformities/deviations in work execution. It shall be the line managers' responsibility to ensure that work is carried out in accordance to the existing and approved procedures and instructions.
- 8.5 The Employees shall ensure that they adhere to the SHE Policy requirements and procedures as well as carry out their obligations without endangering themselves or any work colleague. They are to observe all applicable BPC SHE standards, procedures, instructions, and legal provisions and ensure compliance.
- 8.6 Line managers & supervisors shall liaise with SHE personnel to inculcate a culture of SHE awareness through sustained SHE risk assessment before any work execution.
- 8.7 Business Units shall as a minimum sure regular SHE engagement and ensure that monthly meetings are held and formal minutes kept to keep an Audit trail.

9. Incident Reporting, Investigations, Deviations, Corrective and Preventative action

Botswana Power Corporation will learn from previous incidents and other deviations.

- 9.1 All incident shall be reported in a timely manner following the BPC incident management procedure
- 9.2 Investigate in a timely manner any incident to understand its root cause in order to prevent a recurrence
- 9.3 use audit reports, results of SHE incidents and near misses to Improve SHE performance
- 9.4 In order to ensure independent and unbiased accidents/or incident management reviews, all major incidents shall be investigated by an independent panel established at Corporate SHE Office through the relevant Directors. Major incidents includes fatalities, major explosions or fire outbreaks and multiple disabling injuries affecting more than two people.

10. Compliance and Audits

Botswana Power Corporation will systematically evaluate the effectiveness of the SHE management system, including this policy. The audits shall ensure that BPC operations complies with current legal, regulatory and corporate requirements. It will also assess if the BPC operations remains current with existing operations and is adjusted to accommodate new operations. BPC shall conduct qualified auditors to perform SHE audits. Annually BPC is to conduct one external third party audit for SHE performance and against SHE standards and legal requirements for Grading. BPC through the corporate SHE department shall conduct follow-up reviews to ensure corrective actions are implemented. The General Manager - Internal Audit must audit compliance.

11. Management Review and Continuous Improvement

Botswana Power Corporation management shall ensure that this policy is adequate and effective and identify opportunities for continual improvement.

- 11.1 Policy reviews shall include assessing opportunities for improvement and the need to SHE management system and continuous improvement to BPC SHE performance.
- 11.2 SHE performance, incident investigations and internal and external audits results shall be reviewed driving necessary enhancements to the SHE management system, goals and action plans

12. Documentation Control

12.1. Related Documents

This Policy must be read in conjunction with the following documents:

12.1.1 BPC SHE performance standards

12.1.2 BPC Mechanical and electrical safety rules and regulations

12.1.3 Applicable SHE regulations and standards

12.1.4 SHE legislative Provisions

Document	Document reference	Version date	Version revision
Performance standards/management system			
Safety Rules & Regulations	2010	2010 revision	2010
Act No. CAP 44:01Factories Act, 1979	CAP44:01		

11.2. Documentation Release Control

	Name	Title	Signature	Date
Document Submitted By	Mr. T. Ndzingo	Director Corporate		
Document Approved By	N.J. Raleru	Chief Executive Officer		

SHE Safety Rules and Regulations

The Corporations SHE Policy and revised SHE Performance Standards Management System and all applicable Safety Rules and Regulations shall apply.