

DIPLOMA PLC

# Health & Safety Policy

October 2022



## Diploma PLC Health & Safety Policy

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### General Statement of Policy

The health, safety and wellbeing of our colleagues is fundamental to our success and should be prioritised by all.

Diploma has a duty of care to any person working at, working remotely, or visiting our operating businesses or sites. Our objective is to ensure the health & safety of our colleagues, visitors and partners through:

- Proactive health & safety culture
- Clear health & safety standards in our businesses
- Good health & safety governance across the Group
- Rigorous reporting of health & safety incidents

Group health & safety performance and protocols are reviewed regularly to ensure that suitable standards of safety are maintained. The Board will also review health & safety protocols and performance annually.

The allocation of duties and responsibilities for health & safety issues is outlined in this Health & Safety policy. This health & safety policy will be kept up to date in line with any significant increase in risk as a result of a change in the Group's activities or size. As a minimum the policy will be reviewed on an annual basis.



**Johnny Thomson**

Group CEO

October 2022

## Culture

We expect all colleagues to be proactive in taking responsibility for their personal health & safety and the health & safety of others. Our values of continuous improvement, accountability and respect are as relevant to how we manage health & safety as they are to all aspects of our business. It is also vital that each business encourages a strong health & safety culture, driven by the Managing Director and upheld by all colleagues.

This culture should be built in collaboration with, and in consultation with, colleagues; and should engage colleagues in all physical and mental health & safety matters. It should be a culture that encourages open dialogue without fear of blame or criticism and emphasises the importance of continuous improvement and the health, safety and wellbeing of colleagues.

## Management Structure

The table below outlines the internal health & safety management structure of the Group. The Group CEO holds ultimate responsibility for health & safety within the Group, including ensuring good governance and provision of a safe working environment.



## Standards

Operating businesses are responsible for developing procedures and frameworks to suit their specific circumstances and risk level. However, we expect all our businesses to comply with the standards and requirements of this policy, which they should incorporate into health & safety management within their businesses. At a minimum, each business must fulfil the following health & safety standards.

- The Managing Director holds ultimate responsibility for health & safety within their business.
- Health & safety should be an integral part of your business.
- Comply with or exceed all applicable health & safety laws, regulations and standards and apply responsible standards where legislation is inadequate or does not exist.
- Appoint a trained, and experienced Health & Safety Manager, who is responsible for health & safety management and is given the training and support they need to manage health & safety properly.
- Set appropriate and measurable health & safety objectives, procedures and assigned responsibilities.
- Undertake regular risk assessments to identify and assess hazards and risks and put measures in place to control, prevent or eliminate those risks. Consideration should be given to the increasing risk of extreme weather events and their impact.
- Communicate the health & safety rules and work procedures that set out the required safety standards identified in the risk assessments. These should apply to general safety, procedures for higher risk work, off-site work, remote working, and work travel, with particular consideration given to vehicle driving risk.
- Ensure that all health & safety incidents and concerns are reported swiftly and accurately; that the incident is analysed, and root causes identified; and measures are put in place to prevent a recurrence.
- All business locations should undertake regular health & safety inspections to ensure that health & safety standards are being achieved in practice. Inspections should be recorded, and checklists used to ensure safety controls (such as fire alarms) and safe working practices are in place.
- Health & safety training that ensures all colleagues and contractors are trained and competent to do their work safely, and are given adequate information, instruction, and additional training, where appropriate. This should include general health & safety training; training on emergency procedures, such as fire evacuation; training in the safe use of appropriate equipment; and training in the safe handling of hazardous substances.
- Provide formal first aid training and suitable equipment to carry out first aid duties; appoint an employee to maintain your first aid equipment.
- Ensure that partners' and contractors' policies are compliant with our own standards.
- Ensure the provision of suitable welfare conditions, including hygiene and hand washing facilities, an area for employees to eat and rest and suitable changing facilities, if required.
- Consider mental health and wellbeing as an essential part of your health & safety management.

## **Governance**

Good governance helps us ensure the health & safety of our colleagues, visitors, and partners. Governance allows us to uphold our standards and meet our objectives.

### Business Governance

Each business should put the following governance in place:

- A health & safety policy or framework reflecting the circumstances and risk level of the business that is regularly reviewed, updated and communicated to relevant parties.
- A health & safety manager with formal health & safety qualifications and relevant experience; sufficient health & safety trained personnel to meet the needs and risks of the business and the size of the workforce.
- A health & safety committee that meets at least quarterly and is led by the health & safety manager of the business and, if appropriate, attended by members of each department and business site.
- A record to show regular risk assessments, accident investigations and preventative measures, health & safety inspections, training and instruction, maintenance of the premises, plant and equipment
- An up-to-date record of all incidents, accidents and potential hazards that occur on site or off site, including those that involve employees, contractors, agency staff or delivery drivers. This should include commentary on contributing factors and corrective or mitigating actions taken and any commentary or analysis that you consider significant.
- Internal reporting procedures should take account of local laws. Where required, incidents must be reported to the local governmental enforcement body in the required manner. Those reported incidents must also be communicated to your Sector CEO and the Group CEO within 24 hours.
- Businesses may choose to undertake external certification, such as ISO 45001.

### Sector Governance

Sector management plays a significant role in managing and improving our health & safety record and should regularly sharing best practice across their Sectors and investigate all significant health & safety risks and incidents. Sector CEOs and management teams must:

- Review and follow up the monthly health & safety reporting.
- Investigate, with oversight from the Group CEO, any LTI or dangerous occurrence and, on request, provide a written report to the Group CEO on any serious incidents.

### Group Governance

Diploma PLC is also positioned to support continuous improvement in health & safety across the Group. PLC management will:

- Review monthly health & safety reporting and provide a summary to the Sector CEOs and managements.
- Oversee and support the reporting and investigation of serious incidents
- Communicate openly, and in a timely manner, any relevant health & safety information or issue.
- To investigate any health & safety concerns brought to their attention, either directly or via whistleblowing or a grievance.

## Reporting to Group

### Monthly reporting requirements

The objective of health & safety reporting is to reduce risk and prevent future accidents. All businesses are required to report monthly health & safety data in their MI pack. Businesses must submit the following health & safety data:

- total lost time incidents
- total potential hazards
- total minor injuries
- total working time lost due to lost time incidents (in full and half days)
- Commentary on all minor injuries and LTIs, including, but not limited to, contributing factors and corrective or mitigating actions taken. If appropriate, businesses should provide commentary for serious potential hazards, increased health & safety risk, and health & safety initiatives such as a Sector committee.

### Immediate reporting requirements and protocol

The following must be reported immediately via the MD to your Sector CEO and PLC:

- Deaths
- All Lost Time Incidents
- Any dangerous incident that resulted in serious damage to property or potential injury but didn't. Examples include potential exposure to a biological agent, dangerous driving, or a car accident where no injury occurs but the car is damaged.

The Group CEO may request a written report of the incident. This should be completed by the MD or Health & Safety Manager and reviewed by the Sector CEO within 72 hours. The Group CEO or a chosen representative will follow up with the MD and Sector CEO.

## Glossary

**LTI:** an incident or injury where work time is lost beyond the time taken for on-site first aid. Examples of lost time include time off to recover from the incident, time where modified work duties are assigned; or time lost for off-site treatment (e.g. physiotherapy). Lost time incident records must include total working days lost as a result of the incident.

**Potential hazard:** any situation that has the potential to increase health & safety risk or cause an injury, illness or damage. Examples may include, but are not limited to, an upturned pallet, a wet floor with no sign, damaged PPE, a propped-open fire door.

**Minor injury:** an incident in which an injury occurs but does not result in any lost time beyond the time taken for first aid, if required. Examples of minor injuries may include trips, slips or minor cuts.

## Contact

If you have any questions on this policy, any health & safety concerns, or any suggestions on how we could improve health & safety, please contact Sarah Archer [sarah.archer@diplomapl.com](mailto:sarah.archer@diplomapl.com)