

Document title	SHE Event Management Procedure		
Document Code	UK-SHE-PRO-0026	Version 6.0	Date 02-Jun-2023

SHE Event Management

Document Manager	Simon Neal, Head of SHE
Final Approver	Jonathan Bishop, Head of Management Systems

Document title	SHE Event Management Procedure		
Document Code	UK-SHE-PRO-0026	Version 6.0	Date 02-Jun-2023

CONTENTS

1. Purpose and Scope	3
2. References	3
3. Definitions	3
4. Root Cause Analysis.....	4
4.1. Methodology:.....	4
4.2. Deep Dive Incident Investigation:.....	4
4.3. Consultation and participation:	4
5. Roles, Responsibilities and Authorities.....	4
5.1. Safety, Health and Environment (SHE) Team	4
5.2. Delivery Managers	5
5.3. Service Assurance	6
5.3.1. Maintenance	6
5.3.2. NOC.....	6
5.3.3. Site Access	6
5.4. All employees and suppliers	6
5.5. Cellnex Line Managers	6
6. Change Control.....	7
Appendix A – Process Flow	8

Document title	SHE Event Management Procedure		
Document Code	UK-SHE-PRO-0026	Version 6.0	Date 02-Jun-2023

1. Purpose and Scope

The purpose of this document to define the procedure of reporting, recording and investigating Safety, Health and Environment (SHE) events.

All events must be reported using the SHE Event Report form on the [JIRA Service Portal](#).

This procedure applies to all Cellnex UK employees including operations and the NOC, agency employees, contractors, site sharers, tenants and visitors on Cellnex UK sites.

2. References

This document should be read in conjunction with the following IMS and Group documentation:

- PRO_GR_015 OHS Incident and Accident Reporting, Recording and Investigation
- UK-SA-POL-0001 Site Access Policy
- UK-SA-GUI-0004 JIRA User Guide

3. Definitions

Jira service portal SHE event tickets, can arrive into the system via various routes, the below event types require assignment to the SHE Team by the receiving party (via Site Access team, NOC, Accreditation team and SHE team) for further escalation or investigation to ensure prevention and reoccurrence.

- Accident – An accident is an unplanned uncontrolled event that leads to an injury, ill health or disease.
- Incident - An incident is an event that leads to damage to property or the environment but has not resulted in any personal injury.
- Near Miss - An unplanned/uncontrolled event that had the potential (high or low), to cause injury or ill health, damage to property or the environment.
- Unsafe Condition/Hazard - A set of conditions or circumstances that have the potential to cause injury or ill health.
- Unsafe Act - Performance of a task or other activity that is conducted in a manner that may threaten the health and/or safety of workers
- Non Conformity – Not meeting Legal or Cellnex UK requirements.
- Temporary Access Restriction (TAR) – Placed upon a site that is affected by unsafe conditions or hazards that cannot be addressed in a short space of time e.g. asbestos removal, sites where there are nesting birds etc.

N.B. Should a ticket assigned to the SHE Team and not be SHE related the SHE Team member will assign the ticket to the relevant owner and oversee the ticket to closure.

Document title	SHE Event Management Procedure		
Document Code	UK-SHE-PRO-0026	Version 6.0	Date 02-Jun-2023

4. Root Cause Analysis

Health and safety investigations form an essential part of the monitoring process that we are required to carry out. SHE events including near misses, can tell us a lot about how things actually are in reality.

The fact that we have thoroughly investigated an incident and took remedial action to prevent further occurrences would help demonstrate to a court that our company has a positive attitude towards health and safety.

An investigation can help us identify why the existing risk control measures failed and what improvements or additional measures are needed.

4.1. Methodology:

Avoid seeking responsibility. Causes are sought and not responsible. Accept only proven facts, reliable and verified information. It should collect concrete and objective facts and not interpretations or value judgments. Take into consideration the different types of causes: unsafe acts or unsafe conditions.

Conduct the research using a structured methodology.

4.2. Deep Dive Incident Investigation:

In those cases that are considered necessary, as well as in accordance with the nature, scope, complexity, seriousness of the incident and the applicable legal requirements, the need to carry out a complementary investigation in depth, will be determined by the SHE team.

4.3. Consultation and participation:

The SHE Committee members will participate and / or be informed about the incident and the investigation, taking into account the legal requirements.

5. Roles, Responsibilities and Authorities

5.1. Safety, Health and Environment (SHE) Team

- The SHE Team have overall responsibility to ensure the end-to-end management of SHE Events, ensuring that all SHE-related events are recorded and handled in the correct way.
- Conducting / supporting with SHE event investigations.
- Reviewing completed investigations prior to closure.
- Analysing, reporting trends and supplier performance.
- Ensuring that lessons learnt and control measures are cascaded throughout the business and supply chain via risk assessments, safety bulletins and internal communications, to prevent reoccurrence.
- Responsible for informing statutory bodies and accreditors.

Document title	SHE Event Management Procedure		
Document Code	UK-SHE-PRO-0026	Version 6.0	Date 02-Jun-2023

5.2. Delivery Managers

Delivery Managers are responsible for leading SHE event investigation involving Principal Contractors, Contractors, Suppliers or any other Project related parties for events after receiving the initial notification. This will be assigned via a Jira Subtask for the assignee to complete.

Completion of a subtask would involve obtaining an investigation report from Principal Contractors, Contractors, Suppliers or any other Project related party for events in Jira and ensuring that that an investigation has been completed, the root cause identified and that control measures to prevent recurrence are identified and in an action plan.

The aim of creating subtasks is to allow full end to end management of the 'parent ticket' by the SHE team to ensure full and complete resolution. This new process means that a single Jira ticket can have multiple subtasks raised for other internal teams to complete.

Benefits

The main benefit of this functionality is to allow the owning team of the main or parent ticket to request support from other teams without having to reassign the ticket and lose visibility. The subtasks will also allow more collaboration across teams, track what support is required on tickets and its progress and reduce the number of handoffs.

Creating a subtask

There is a subtask type for each team within Jira so that its simple to use, all you need to do is add details of what support you need from the team in question. The subtask will auto assign to the relevant team based on its type, email notifications sent and it will then appear in the queues that are already created for the various teams. The subtask is identifiable in the queue based on the blue issue type.

The subtask is auto populated with key information from the parent ticket such as the Site Access Request Reference, Site Name, Site ID.

Types of subtask

- NOC
- SHE
- Accreditation
- Landlord Care
- Site Access MBNL
- Site Access Core
- Sub-task – generic sub task that can be used for any team/individual

Comments & Workflow

A subtask has the same features as any other Jira ticket so that comments can be added, emails can be sent, the status set depending on its progress ("Awaiting for Support", "On Hold", "In Progress", "Done" etc.) and it can be reassigned if required.

Document title	SHE Event Management Procedure		
Document Code	UK-SHE-PRO-0026	Version 6.0	Date 02-Jun-2023

Please note that once a subtask is created and the original ticket becomes the parent ticket, the parent ticket can only be moved to “Done” or “Closed” when all subtasks have been set as “Done” or “Closed”.

5.3. Service Assurance

5.3.1. Maintenance

- To triage any information provided by Site Inspections/PPMs/Post Work Reports and escalate to Near Miss status if required
- To provide a rapid response to any on site incidents that could develop in to more serious events
- Supply information derived from our Planned Preventative Maintenance (PPM) activities to assist in any investigation
- To action any remedial works identified that are not attributable to and/or for action by our Field Deployment suppliers

5.3.2. NOC

- Receiving and acknowledging issues and incidents raised in to the JIRA ‘Issues and Incidents’ portal
- Triageing the issues and incidents and assigning, escalating or issuing actions to resolver groups as required depending on nature, severity and impact of the issue raised

5.3.3. Site Access

- Managing any future Site Access Requests to prevent further incidents via the Temporary Access Restriction (TAR) process
- To review and update the Site Access Information Form (SAF within Agora) if required to prevent future incidents
- To investigate Site Access Requests (SARs within Agora) linked to incidents
- To liaise with Site Providers in relation to breaches of the Site Access Policy
- To confirm that individuals linked to any incidents had valid accreditation credentials and key/iLOQ data

5.4. All employees and suppliers

All employees and suppliers are responsible for ensuring all SHE events are reported within 24 hours of occurrence, as per the contractual requirements. Under normal circumstances, all investigations should be closed within 30 days, but may take longer depending on the required actions. An Investigation update is required to be sent to all relevant parties on a regular basis.

5.5. Cellnex Line Managers

Cellnex line managers are responsible for investigating events involving their direct employees, supported by the SHE Team, ensuring that that a an investigation has been completed, the root cause identified and that control measures to prevent recurrence are identified and implemented.

Document title	SHE Event Management Procedure		
Document Code	UK-SHE-PRO-0026	Version 6.0	Date 02-Jun-2023

6. Change Control

This document is controlled as part of the Cellnex UK IMS via the Engage platform which maintains history of changes / version control. Downloaded or printed copies are uncontrolled.

Document title	SHE Event Management Procedure		
Document Code	UK-SHE-PRO-0026	Version 6.0	Date 02-Jun-2023

Appendix A – Process Flow

