Safety Communication Procedure

Rev No.	Reason for Revision	Prepared By	Checked By	Approval by
Rev No. 00	First release	R&P Sub Committee	D Kamath	Vijay Chourey
Rev No. 01	Standardization of procedure	Navendra Singh (Group Head – P & CB; Corp Safety.)	Sanjay Kale (Head – Fire & Safety; Corp Safety)	Vijay Chourey (Chief – Corp Safety)
Rev 02	Periodic revision	Navendra Singh Head- Safety (T&D) Corp safety	Rajesh Sharma Head- Safety (Generation) Corp safety	Suresh Khetwani Chief - Corporate Safety & Environment

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1. OBJECTIVE:

Objective of this procedure is provide guidelines for internal and external safety related communication further to help promote a positive safety culture, build commitment and ownership for safety and secure the continual improvement of safety systems.

2. SCOPE:

This procedure applies to all operating plants and project sites of Tata Power Group companies including JVs/Subsidiaries.

3. EXPECTED RESULTS:

3.1. Manage full compliance for timely and specific external and internal communication pertaining to Occupational Health & Safety (OH&S) requirements.

4. ACCOUNTABILITY & RESPONSIBILITY:

4.1. ACCOUNTABILITY: Concerned Division's Heads/Assets Custodian.

4.2. RESPONSIBILITY: As defined in the procedure.

5. GLOSSARY/ DEFINITIONS:

BCDMP: Business Continuity and Disaster Management Plan

Communication: process of transferring information from one entity to another.

Controls: Methods used to manage safety risks. Controls can be Elimination, Substitution, Isolation / separation, Engineering Procedural/ administrative, Development training/ PPE.

Consultation: Seeking and giving of advice, information, and/or opinion, Usually involving a consideration.

External Communication: Exchange of information with Govt. Authorities, Statutory authorities, Shareholders, Mutual aid agencies, Press or Public.

Incident of serious nature means an incident which results in-

(i) Immediate loss of any part of the body or any limb or part thereof.

(ii) Crushed or serious injury to any part of the body due to which loss of the same is obvious or any injury is likely to prove fatal.

(ii) Unconsciousness,

(iii) Severe burns or scalds due to chemicals, steam or any other cause.

(iv) Incident which causes death to any person

(v) Incident which cause such bodily injury and will prevent or probably prevent the person injured from working for a period of 48 hours immediately following the incident.

Internal Communication: Exchange of information within various Divisions, Departments & Sections and contractors working under Tata Power.

Interested parties: Individual or group concerned with or affected by the safety Performance of Tata Power.

Key HSE information: Information determined to be essential to the employees to ensure expected safety performance is achieved and maintained. This information may include safety risks and associated controls, safety incident statistics, progress on key safety

objectives, lessons learned from incident investigations, feedback on employees concern on safety etc.

Safety Contact: Safety Contact is one among the efficient tools for sharing of learnings from incident/near miss. Safety contact plays important roles in inculcating safety culture in the organization through learning and sharing of key safety messages through various platform like trainings, meetings etc.

Shall: Mandatory requirement

Should: Optional requirement

Statutory requirements: Laws, regulations applicable at the location of plant /work.

6. PROCEDURE:

6.1. Internal: The Safety communication is integrated with the corporate communication system of Tata Power. The typical safety communication system is Annexure A.

6.1.1. **'SAP EHS'** facilitates reporting, collating and aggregating the Daily reports on safety Near misses, First Aid Cases, Medical Treatment Cases (MTC), Lost Time Injury Cases and Fatal incidents including Root Cause Analysis and communicated to employees through Daily Information Reports (DIR).

6.1.2. Safety Policy, Safety Principles, Safety standards & Procedures, Safety Guidelines etc. are communicated through 'Safety Portal' on Sangam web site.

6.1.3. Tool box meetings, JSA/HIRA discussion, safety briefing, safety contact, safety pause are conducted before starting the activities.

6.1.4. Safety Issues within Tata Power employees and contractors are communicated through a hierarchy of meetings at various levels, e-mails, circulars, memos, standing orders, reports, newsletters, promotional activities, incentive/reward schemes, Video Conferences, telephonic conversations, interpersonal communication, LCDs, etc.

6.1.5. All the safety related incidents are reported to Senior Management within 4 hours. Lost Time Injury / Fatal incidents or dangerous occurrences at site likely to be picked up by the media are immediately reported to ED and MD by the SBU Head and also informed to Head Communication, Head Safety and the nearest relative of the injured person.

6.1.6. All spokespersons and especially divisional/location heads must proactively share any sensitive information with Corporate Communications on PR implications such as (litigation issue, plant related issues, accidents etc.) pertaining to their jurisdiction in advance. Inquiries in the following categories are particularly sensitive and must be forwarded immediately to Corporate Communications:

i. Financial (e.g. Quarterly or annual earnings, stock performance, pricing policies, market forecasts)
ii. Corporate (e.g. litigation, public affairs, unscheduled power failure/outages, corporate reorganizations, executive changes)
iii. Crises (e.g. power failures)
iv. Investigative (e.g. rumored new project & expansions, reorganizations)

v. Partnerships (e.g. shareholder relationships, specially future acquisitions or alliances)

6.1.7. **Safety Contact**: Safety Contact is one among the efficient tools for sharing of learnings from incident/near miss. Safety contact plays important roles in inculcating safety culture in the organization through learning and sharing of key safety messages through various platform like trainings, meetings etc. Safety contact consists of **(1) Safety Pause: Instructions for safe evacuation** and **(2) Safety Learning from recent incidents**. Both are shared prior to start of any training/meeting in the form of safety contact.

i. All meetings/trainings/gatherings in Tata Power should start with safety contact.
ii. Safety contact should start with Safety pause which is briefing of Instructions for safe evacuation (refer **Annexure 1** for sample format) and should finished with sharing of Safety learnings of recent incident.
iii. Instructions for safe evacuation shall be shared in line with BCDMP of the location.
iv. Safety learnings may be from any internal or external incident, near miss occurred recently and may be in form of verbal, picture, presentation, video etc.
v. Any person present in the meeting/training may share safety contact. Typical length of safety contact may vary from 3-5 minutes.
vi. In case meeting on video conferencing (VC), initially each location should brief the Safety pause -Instructions for safe evacuation to the participants of their location separately. This should be done simultaneously by muting speaker so as not to interfere with other locations, subsequently sharing of Safety learnings should be common for all locations thorough VC.
vii. In case of meeting, safety contact & its learnings should be recorded in MOM. Refer **Annexure – 1** for more details of sharing and capturing of safety contacts.

Typical examples of safety learnings for safety contact may be but not limited to as under-

a. Incident happened recently
b. Lesson learnt shared from reportable/recordable incidents.
c. Fire incident
d. Near miss
e. Traffic accident
f. Significant threat from current epidemic/virus like COVID-19/Ebola/Zika/swine-flue etc.
g. Safety violations like safety rules not followed.
h. Any incident near miss happened at home like electrocution/LPG leakage/fire etc.
i. Any other safety concern

6.2. External

6.2.1. Notification of dangerous incidents / accidents :

i. Where any dangerous incident and reportable accident takes place in a factory, the Manager of the factory shall, within 4 hours of happening of such incident, inform the Director Industrial Safety & Health. Where the incident is fatal or of such a serious nature that is likely to prove fatal, information must be sent to –
   i. the District Magistrate or Sub Divisional Magistrate,
   ii. the Officer-in-charge of the nearest police station,
   iii. Electrical Inspector in case of electrical incident,
   iv. The nearest relatives of the injured or deceased person.

ii. The notice so given shall be confirmed by the Manager of the Factory to the authorities mentioned above by sending to them a written report in case of an incident in Form No. 24 and in the case of a dangerous incident in Form No. 24-A within 12 hours of the taking place of any such incident.

iii. If any incident occurs in connection with the generation, transmission, distribution supply or use of the energy resulting in loss of human life or injury to human being, written report in Annexure format XIII to be sent to Electrical inspectorate within 48 hrs.

7. Records:

7.1. All record shall be maintained as per respective legal requirements**.**

8. Training & Communication:

8.1. Training of Safety Communication shall be included and covered in Safety Training Calendar as per Safety Training needs.

8.2. Initial Communication to be done through Corporate Communication, Email and subsequently shall be made available at safety portal at Sangam.

9. VERIFICATION

9.1. Verification of implementation shall be done during Safety audit, field safety visit and site inspections.

10. Exceptions: Any Exception to this procedure shall only be done as per section 6.3 of Document Control .Procedure (TPSMS/GSP/DC/014/REV01**).**

11. REFERENCES

- Tata Power Safety Management System Manual
- Tata Power Incident Reporting & Investigation Procedure
- Tata Power Document Control Procedure
- Tata Power Fire Safety Management Procedure
- Corp Communication Protocol
- Indian Factory Act 1948 and State Factory Rules
- Electricity Act and Rules
- Shop & Establishment Act & Rules etc.

12. Review:

12.1. Review of this procedure shall be done as and when but not later than once in every three (03) years. Typical Factors like Changes in legislation, Review of Incident Reports, Inspection & Audit findings, Feedback from users, Recommendations in Incident investigation reports may be inputs for the review and revision of the procedure.

12.2. In case release of revised procedure gets delay due to obtaining feedback or any other reasons, safety advisory may be issued immediately to take precautions for the proposed changes in the procedure and revised procedure should be released subsequently.

13. ATTACHMENTS/APPENDIX :

Annexure 1 - Safety Contact

Annexure 1

Illustration for Safety Contact

(1) Safety Pause - Instructions for safe evacuation

Format:

Location: - _____

Good morning/ afternoon/ evening everybody,
We are all assembled at _____ (name of meeting room) on _____ (no. of floor) of _____ (name of location). This conference room has _____ (no. of exits) exits which open to the _____ (passage/corridor/gallery). If you hear the wailing siren or emergency alarm, it is a clear indication of an emergency.

- Please DO NOT panic.
- Start moving out from the presently occupied area using the available exits to the Safe assembly area situated near _____(Location)
-
- Do not use the lift.
-
- Use the staircase to reach safe assembly area
-
- While moving down the staircase keep left side and make way for the rescue team approaching in the opposite direction.
-
- The building is equipped with sufficient fire detection & firefighting equipment
-
- Please follow instructions of the safety wardens (please mention name of respective area/location warden) who are trained to help you for a safe and speedy evacuation.

If you are a visitor you would have a map attached to the Visitors ID card issued to you (If the visitor id has a map attached).

Thank you.

(2) Typical Examples of Safety learnings from recent Incidents

1) Mr. ABC shared some recent incidents of LPG cylinders explosion in country and emphasized to take necessary precautions to prevent recurrence in our homes. LPG safety checklist has been shared to all to ensure required precautions from Hazards of LPG at homes.

2) Mr. ABC shared the road accident that occurred in Mundra. Though the car was damaged badly, both persons inside the car survived without any injury as they were donning Safety seat belts. Mr. ABC emphasized use of Safety seat belts for both front and rear seats.

3) Nearmiss related to cable spike job at DCS was shared and need of use of live cable detection device and their accurate interpretation to ensure proper de-energization was emphasized.

4) Few incidents related to reversing of vehicles were shared and need of presence of another person at rear of vehicle at the time of reverse was emphasized.

5) Mr. ABC from CGPL Mundra shared learnings from recent lift incident as safety contact. Key learnings shared were need to use detailed JSA and effective supervision of the high Potential activities.

6) Mr. XYZ shared recent incidents of BORL in which burn injury occurred due to improper isolation & few other unsafe practices .He emphasized to take necessary precautions to prevent recurrence due to improper energy isolation and adhered to safe work practices.

7) Chairman Shared concern about low number of near miss reporting which was also discussed during recent MD BSC review. He insisted that divisions should encourage their employees to report maximum numbers of near miss as by taking timely action on reported near miss occurrence of accidents can be minimized.