HEALTH AND SAFETY – How we do business in Openreach
(To be used in conjunction with the appropriate Task Statement)

Openreach is the proud guardian of a critical national asset, the local access network; the infrastructure that delivers the data, broadband and voice services to each home and business throughout the UK, sometimes referred to as the 'first mile'.

We were created to give communications providers equal access to the wires and fibres that connect us all, and to maintain and improve this infrastructure, which underpins the entire UK communication industry.

We supply Communications Providers with products and services that are linked to the network. We also work on their behalf so that across the UK, tens of millions of people stay connected via reliable local access. This makes untold millions of calls, online use and sharing of information possible.

As we're part of the BT Group, parts of this document will relate to the BT Group of companies as a whole. This is simply because the line drawn is a benchmark which applies to every part of the BT Group, including Openreach.

This document sets out our approach to Health and Safety so that up-front; you have an assurance of our commitment to working safely. It will also give you details on the various supporting safety elements embedded in our Safety Management System.

In addition, this document will be paired with an associated task statement, which contains further detail on the specific type of work we'll be doing on behalf of your Communications Provider. This will contain a Generic Risk Assessment.

If you think there are specific hazards at your site which require an additional assessment, or you have a safety issue, then you need to tell us via your Communications Provider in the first instance.

To find out more about Openreach, visit our website: **http://www.openreach.co.uk**

If you have enquiries regarding this template, then please email **safetydirect@openreach.co.uk**

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1. HEALTH AND SAFETY ORGANISATION

1.1 Health and Safety Policy Statement

Openreach, part of the BT Group, is committed to achieving the highest standards of health and safety across its business and aims to act as a good employer in all matters related to health and safety at work. It also accepts responsibility for ensuring the conduct of its affairs is not harmful to the health and safety of employees or any other people affected by its activities.

BT Group has prepared a group safety policy statement that is contained in the BT "Health and Safety Handbook" (copy of the statement is appended). This is a document available to all employees and agency staff and is held electronically on the BT intranet. The BT Group Safety Advisor reviews the policy statement annually. The issue and review information of each published text is shown on the site. Currently the policy statement is dated 30/06/2015 and next review date is 30/06/2016.

1.2. Organisation of Safety

The board member who has a specific responsibility for safety in BT is the Chief Executive, Gavin Patterson. BT's Group Safety Champion and the Group Safety Advisor support him in this role. The Advisor's function is to recommend the safety policies and objectives for the group together with strategies for continuous improvement in health and safety performance. The Chief Executive receives regular reports via his Champion on the company's health and safety performance and any major issues affecting it.

One of the functions of the Group Safety Advisor is to consider the effect of health and safety legislation upon BT's operations and ensure BT has in place leading-edge strategies and policies for the successful management of occupational health, safety and employee wellbeing. By maintaining a highly effective health and safety framework, the Company minimises the risk of harm to individuals (employees, contractors, customer's employees and the public), BT and the brand. By championing employee wellbeing, the BT Group seeks to promote the overall success of the business.

Strategies and procedures are developed to promote effective health and safety performance with legal requirements being regarded as a minimum standard to be achieved. Where BT operates abroad these arrangements are applied unless local legislation demands higher standards. Consultation with national and international bodies responsible for drafting legislation allows BT's opinions and concerns to be fully expressed and regular liaison with the enforcement authorities helps ensure that new statutes, practice and guidance are rapidly incorporated into its policies ensures that BT remains at the forefront of best practice.

Since its publication BT has applied the principles of HSG 65, Successful health and safety management to its operations but is currently aligning its operations and procedures to the requirements of BS OHSAS 18001, the occupational health and safety standard.

At this time BT is preparing for possible future certification with a project to align its occupational health and safety management system to the OHSAS18001 Standard.

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Openreach has its own Health and Safety Champion who, together with the Openreach's safety advisor, interprets company policy and initiates safety procedures within their organisation on behalf of the chief executive. A senior manager who is a member of the Openreach Executive takes the Champion's role. In conjunction with the safety advisor they formulate the safety plan with its targets and objectives for their business whilst incorporating the Group policies. This is then submitted to the board for approval prior to implementation. Openreach also has a consultative forum chaired by the champion that considers health and safety issues and monitors progress against the safety plan.

LoBs (of which Openreach is one) with significant safety risks have teams of professionally qualified health and safety advisors within their business. All LoBs can call on assistance from Safety Services, which is part of Ark Workplace Risk, the contractor BT employs. Safety Services supports the line management with day-to-day safety issues as well as advising on the implementation of Group policy and the LoB Safety Plan.

The senior safety professionals from each LoB form an operational group, the Centre of Expertise, which, under the leadership of the Group Safety Advisor, ensure that all parts of the group adopt coherent and compatible strategies to manage the issues within their remit.

The Occupational Health Service monitors the health profile of BT people and works with the BT's Chief Medical Officer to minimise the ill health effects of any procedures, processes or hazardous substances used within BT.

1.3. Supervision and Monitoring Safety of Engineering Staff

Line managers are responsible for the health and safety of their people and of others who may be affected by the work their people undertake. Openreach has a system of Job Licensing whereby, after receiving appropriate training and subsequently undertaking a period of supervised on-the-job practical experience, engineers are authorized to undertake tasks for which they are assessed as competent. The licence is reviewed annually or when work methods change. The annual review ensures that engineers are fully conversant with the significant risks of the particular task they are licensed to undertake, the control measures Openreach employs to reduce those risks, so far as is reasonably practicable, and the likely residual risks that have to be considered while carrying out an on-site risk assessment prior to beginning the work. If the engineer fails to meet the required standard then a period of retraining is undertaken to ensure the required competence level is achieved.

Openreach's computerized work allocation system can only allocate tasks to those engineers licensed to undertake them.

Also to ensure Openreach engineers carry out their duties correctly and that safe systems of work are effective, regular checks are made by line managers using activity-monitoring checklists. This work monitoring system is part of our Safety Management System. These checks are conducted to a predetermined schedule dependant on the range of work the person does and level of perceived residual risk inherent in the tasks. The checking procedure requires a manager to observe each of their people carrying out the specified tasks and to confirm the safe system of work is being followed. Appropriate on the job instruction may be included as part of the feedback resulting from these observations. In extreme cases

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retraining may be undertaken. Ultimately disciplinary action, in line with BT Group's published personnel procedures, can be used if a safety breach is encountered.

1.4. Safety Advice

Openreach people have access to vast library of safety advice and information via our company intranet but if the required information is not available they are able to address an enquiry via “HR Home”, a computer based system that channels requests to the knowledge source to provide the information.

In an emergency safety advice is available to all Openreach employees, 24 hours a day, through The Health and Safety Helpdesk, providing advice to all staff. The helpdesk is open from 08:00 - 17:30. Outside these hours the caller is referred to a 24-hour control, which is able to contact or “call out” a Safety Consultant if required.

1.5. Safety Auditing

The Chief Executive requires BT Group’s audit division to conduct scheduled safety management audits of each line of business within the group (including Openreach) and report the findings to the board. They examine the way that BT Group’s Health and Safety Strategy is being implemented. Such audits are normally conducted on an annual basis and the findings are presented to the senior management together with recommendations on how safety could be further enhanced. Agreed outstanding recommendations normally form the basis for the business / division health and safety plan for the forthcoming year.

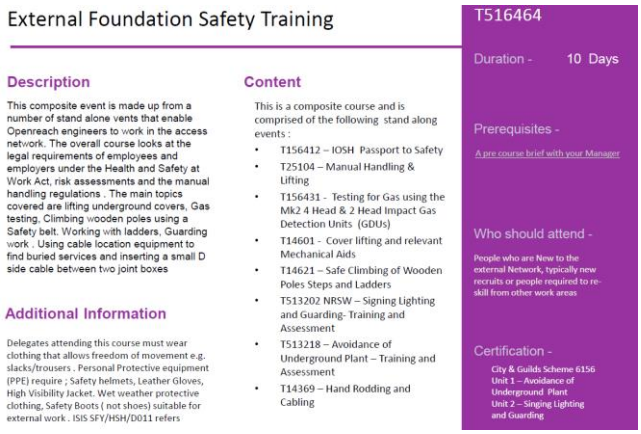
Ark Workplace Risk’s Safety Services personnel may, at the request of the LoB Safety Champion, audit the management of safety within the line of business.

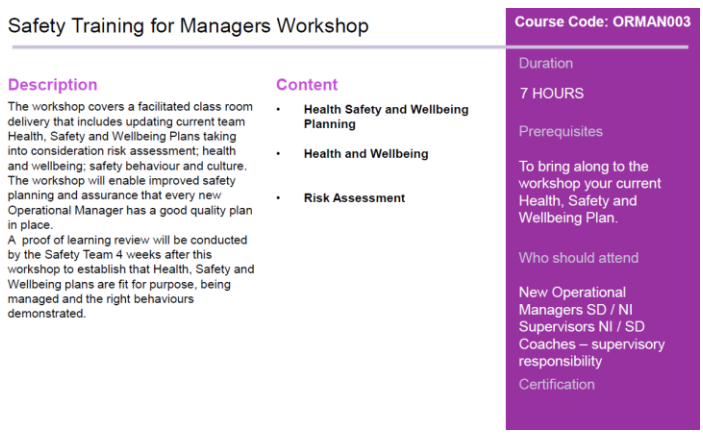
2. HEALTH AND SAFETY TRAINING

All our people have a personal development plan jointly agreed with their manager which identifies their training requirements.

BT people have access to a vast library of training resources within our learning management system called Learning Home.

Examples of safety training resources available:





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All new BT engineers are required to attend an induction course which includes:

- Task specific instructions
- Basic accident awareness
- Fire precautions
- General work related safety procedures

Most operational training in BT has a substantial safety element. Those with safety responsibilities or those engaged in high risk activities are given more focused, task relevant training.

Managers give priority to training required as a result of the introduction of new equipment, materials or changes in procedures and work practices.

We have a system of **Job Licensing** for our engineers. After they have been trained and have completed a period of supervised on-the-job practical experience, engineers are authorised to carry out tasks for which they have been assessed as competent.

The licence is reviewed annually or when work methods change. If the engineer fails to meet the required standard, a period of re-training is undertaken to make sure the required level of competence is achieved.

Our work allocation systems can only allocate tasks to those engineers licensed to undertake them.

3. CUSTOMER SITES, SITE RULES AND OTHER CUSTOMER REQUIREMENTS

3.1. Customer Site Induction Training

Engineers and where necessary, their managers, will attend any induction or safety training which the customer requires to be undertaken as a pre-requisite for working on site.

3.2. Customer Site Rules

Openreach's policy on meeting customers' safety requirements is set out in the Health and Safety Handbook, which is available to every employee. To meet customer requirements, we will co-operate by complying with specific site safety standards and procedures where these are higher than ours.

Before work begins, Openreach will advise the customer of any other work that needs to be undertaken to support its on-site activities, and as necessary, will also do so during the course of the contract.

Openreach expects the customer to comply with health and safety legislation by providing a safe working environment for its people and for those working on its behalf. Arrangements for contract safety liaison will be discussed prior to work commencing thereby ensuring good communication at all times during the work.

3.3. Health and Safety Passports

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In conjunction with Energy & Utility Skills (EUSR), Openreach developed a **Health, Safety and Environmental Passport scheme** which checks understanding of health, safety and the environment in line with the core syllabus recommended by the Health & Safety Executive (HSE) as described in their Good Practice Guide for Health and Safety Passport Training Schemes.

The vast majority of our engineers have valid Health, Safety and Environmental passports, with all new engineering recruits trained and assessed to receive their passport.

The passport is valid for three years – engineers are required to do refresher training and pass an on-line assessment to renew their passports.

The EUSR Health, Safety and Environmental passport is affiliated with the Constructions Skills Certification Scheme (CSCS).

3.4. Customer's Contractor Verification

Where tenderers are to be visited as part of a customer's selection procedure, this can be arranged via the Openreach representative. More than one site may need to be visited as centres dealing with the supply and maintenance of plant and equipment can cover large geographical areas and be spaced a great distance apart.

Information supplied to customers by Openreach may be affected not only by commercial confidentiality and data protection laws but also national security considerations and customers are reminded, if visiting our premises, to protect our intellectual property accordingly.

BT Group holds ISO 9001 accreditation across the scope of its business and the appropriate certificate of validation can be seen on request.

3.5. CHAS Accreditation

BT Group has applied for, and received approval from, the administrators of the Contractors Health and Safety Assessment Scheme (CHAS). CHAS is a scheme supported by the Health and Safety Executive and used by the majority of Local Authorities, Housing Associations, Health Trusts, Fire Services and similar public bodies to enable contractors to obtain pre-qualification approval and be short-listed for work. The CHAS scheme approval system validates the contractor's compliance with health and safety legislation and requirements. Holding approval demonstrates to any would-be clients that at the very least the contractor is operating legally.

To obtain approval BT Group had to demonstrate it had robust systems for managing all aspects of health and safety including procedures for monitoring staff compliance with company instructions and training. Openreach's instructions are drafted to ensure we meet all statutory obligations. The method of selection, use and maintenance of all tools and equipment in serviceable condition was also considered.

Reassessment to maintain CHAS approval occurs every 12 months.

3.6 Achilles Accreditation

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BT Group has achieved Achilles Accreditation (www.achilles.com) at Category B2, confirming the effectiveness of its Health and Safety Management System through office and on site audits of its processes and procedures. It gained better than 97% overall via assessment of eight assessed subcategories.

Achilles accreditation is renewed annually after reassessment.

3.7 SafeContractor Accreditation

SafeContractor (www.safecontractor.com) is a health and safety accreditation scheme which undertakes audits to the SAFEcontractor Charter Standard which also meets the CDM Stage 1 Competence Assessment core criteria. After achieved SafeContractor accreditation BT was added to the approved contractor list.

SafeContractor accreditation is renewed annually after reassessment.

4. HEALTH AND SAFETY DOCUMENTATION

4.1. Communication of the Safety Policy

The "Health and Safety Handbook" can be accessed by all employees via the BT Group Intranet. The handbook is regularly revised and relevant sections may be made available to customers when required to show evidence of adequate risk management during the proposed works.

4.2. Safe System of Work

Openreach documents its safe system of work in a national documentation system, ISIS, and a large number of these documents deal with health and safety. Where appropriate, Openreach has summarised its safe systems of work and safety rules as sections in the Health and Safety Handbook.

4.3. Other Safety Documents

In addition to the above documents, there are monthly “Safe & Well” newsletters for both field and non-field people, and a Group wide “Health and Safety News” which contains short articles on topical health and safety issues. Additional briefings and work function specific memos also communicate important safety information to managers and their people.

5. INCIDENT AND INCIDENT PROCEDURES

5.1. Reporting and Investigation of Incidents

Openreach uses a centralised Incident Reporting Group to deal with the administration of its incident and incident reporting policy. Any Openreach employee who has an incident telephones a specified 0800 number, or can report the incident online. An entry is made on the incident record database and the employee is issued with a unique reference number. When the incident occurs on a customer’s premises, the injured employee would also inform the customer. The line manager investigates the incident and reports their findings.

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All details of incidents are recorded for statistical purposes and, where necessary, reported to the enforcing authorities in accordance with RIDDOR.

The same procedure is used to record reported incidents to both Openreach's contractors and any member of the public injured as a result of its operations.

Openreach monitors the number of incidents to its people, contractors, or members of the public. Accident statistics are provided to the Lines of Business on a monthly basis and are used to assist in identifying trends and possible failures in the company's safe system of work.

5.2. Fatalities, RIDDOR and Lost Time Injury Incidents

Openreach Safety Performance

	Openreach Safety Performance							
Accident Type	**Q2 2014-15**	**Q3 2014-15**	**Q4 2014-15**	**Q1 2015-16**	**Q2 2015-16**	**Q3 2015-16**	**Q4 2015-16**	**Q1 2016-17**
Fatality	0	0	0	0	0	1	0	0
Riddor Reportable	35	31	41	26	27	32	33	14
Any Lost Time*	63	46	69	46	55	43	57	44
Any Injury*	253	225	266	192	190	155	178	188
Near Missess	28**	88	99	87	124^	129	109	115
Number of Employees	*32,273*	*33,352*	*33,125*	*32,614*	*32,446*	*32,080*	*31,781*	*31,491*
(for use in producing like for like Accident Frequenc Rates)	*** Excludes Road Traffic Accidents and Violence to Staff incidents. ^ Increase following a new near miss campaign **system**							

5.3. Incident Reduction Strategy

As well as the Safety Management System data the company uses its incident statistics to identify weaknesses in procedures or people's skill levels and to address these failings. The Group HR Director is also the Group Safety Champion. Openreach has its own Health and Safety Champion who is a senior manager within the Openreach Executive. All the champions are tasked with continuously improving standards within their organisation and have regular meetings with managers representing each part of their business. The Group Champion calls a quarterly forum at which the Business Champions and he discuss all aspects of safety including the statistics and the response to them. The response may be to recommend a change in the group safety policy and strategy. The business champions, at their meetings, may identify various initiatives relevant to their business such as: -

- Commissioning of a new training course or reviewing/improving the content of a current course.
- Initiating awareness presentations at team meetings.
- The development of new or improved equipment e.g. the fibreglass ladder, new safety harness, improved manhole lifter etc.
- The launch of company-wide safety campaigns such as "Starting Point" which stemmed from concern about the high level of traffic accidents. It consists of a briefing, attitude modulation, corrective driver training and an award winning video. Work is underway to examine further ways of refocusing this initiative and to highlight this, BT Group has joined the Government "Think" Campaign.

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- Openreach is pleased to support the IOSH "No Time to Lose" campaign on working together to beat occupational cancer. We believe it strengthens our strategy through the focus on key themes which affect our people.

6. ENFORCEMENT ACTION

There have been three prosecutions in the last 5 years.

BT was prosecuted in October 2015 after a customer fell through a cellar hatch which had been opened to access telecoms equipment in the basement of their property and had not been properly guarded by one of our engineers. BT received a £5k fine for an offence under the work at height regulations.

BT was convicted of an offence under Section 2 of the Health and Safety at Work Act 1974 when an engineer fell through a partially boarded loft on 17 May 2011. At sentence on 13 June 2016 BT was fined £500,000 and ordered to pay costs of £98,913.51.

BT was also convicted on 11 April 2016 to an offence under Section 2 of the Health and Safety at Work Act 1974 when 2 engineers fell from height in a telephone exchange after making contact with a defective light fitting. At sentence on 27 May 2016 BT was fined £600,000 under the new Sentencing Guidelines and ordered to pay £60,000 Prosecution costs.

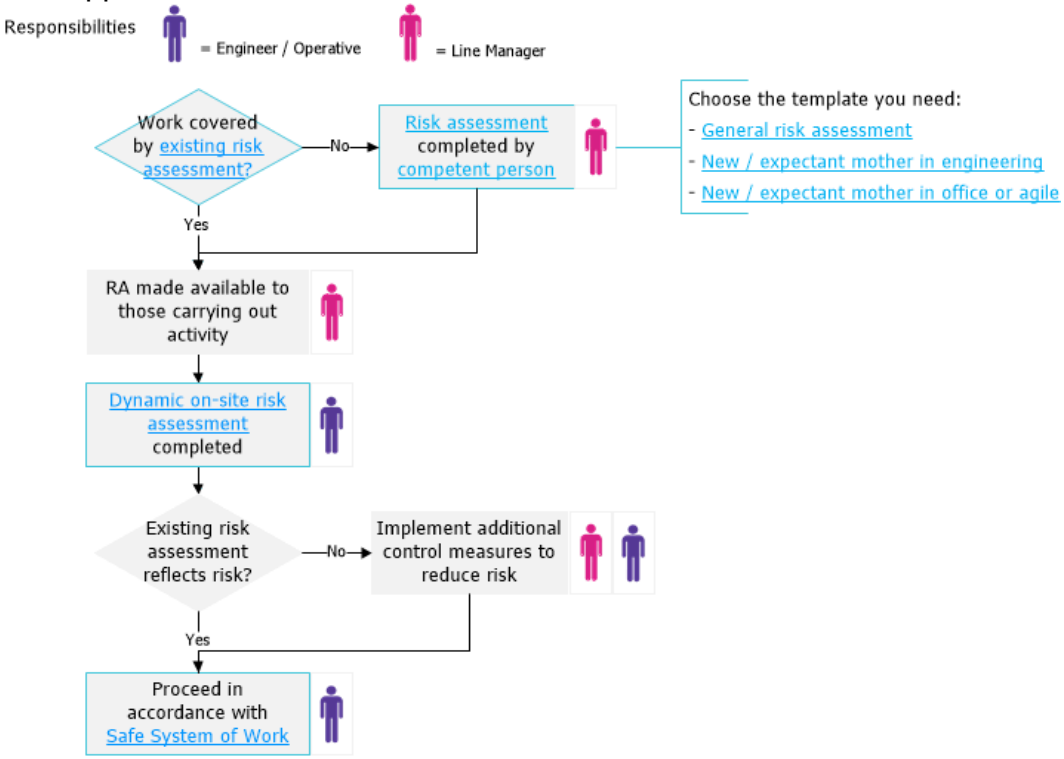
7. ASSESSMENT OF WORK PROCEDURES AND SUBSTANCES

The majority of work activities associated with the provision and maintenance of Openreach's services are detailed in standard Openreach Generic Risk Assessment and COSHH Assessment documents.

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7.1. Risk Assessments

Our approach to risk assessment is summarised in this flowchart:



7.2. Control of Substances Hazardous to Health (COSHH) etc

Openreach has a well-documented system of generic COSHH assessments for all substances and materials purchased through its procurement department. This is possible because of the standardisation of work procedures. Where products need to be purchased locally the manager undertakes a local assessment with, when required, the assistance of safety professionals.

The manager responsible for the work being undertaken will be able to supply assessments and implement appropriate control measures for substances his people use as part of the work process.

Physical agents such as vibration, noise and electromagnetic or ionising radiation will be assessed by competent persons where relevant and work will be planned specifying safe systems of work in accordance with assessments undertaken by Openreach management with regard to regulations, appropriate guidance and industry standards.

7.3. Asbestos

Openreach engineers are trained in Asbestos Awareness following the HSE's recommended syllabus. This is repeated on a 3 yearly interval.
Openreach expects the customer to make known to the planner or engineer the locations of known or suspected asbestos within their premises and to give access to the asbestos register if requested to do so. Cable routes etc. will then be planned avoiding these

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locations. Openreach engineers are required to verify with customers whether or not asbestos is present in the proposed work area.

In the event of a suspect material being found during the installation, Openreach's standard procedure in these cases will be adopted and the work will cease. The worksite will be closed down and the material covered or enclosed, so far as is reasonably practicable, given the situation. The designated customer representative will be informed that suspect material has been found. The representative will be asked to arrange for the examination of the material.

Work will only recommence when the Openreach manager responsible for the work has received an analyst's report confirming either:-

- The material is not asbestos,
- The material was asbestos and has been removed by a licensed asbestos removal contractor and a competent analyst has confirmed the site as clear.
- The material was asbestos. A licensed asbestos removal contractor has removed all loose and damaged material and the remaining asbestos has been sealed and made safe and a competent analyst has confirmed the site as clear of asbestos dust and waste. In these cases the customer's representative is expected to tell the engineer about the specific risks and recommended control measures advised by the asbestos removal contractor.

8. PERSONAL PROTECTIVE EQUIPMENT (PPE)

Openreach fully supports the principle that in the hierarchy of controls, the use of PPE is the "last resort" to protect against risks to health and safety. It is policy to supply PPE in accordance with the relevant risk assessment and employees are obliged to comply with this policy. Openreach provides its employees with a full range of PPE sufficient to meet all situations normally encountered within the scope of their work but if the customer's PPE standards are higher than Openreach's then Openreach engineers will be provided with non-standard PPE to comply with the higher standard.

Openreach people are trained in the correct use and maintenance of the equipment they are given.

9. PLANT AND EQUIPMENT TESTING, INSPECTION AND MAINTENANCE

Openreach takes great care to ensure that all plant and equipment meets suitable standards before inclusion in the Company Engineering Stores Catalogue. The minimum standards quoted would be those of the British or European Standards Institutes i.e. BS, EN or ISO. Frequently after field trials Openreach demands additional safety features not required by normal standards. Openreach uses a series of Generic Standards (GSs) to ensure satisfactory standards are met. GSs may form part of the initial tenderer selection process and subsequently be appended to Invitations to Tender and form part of the resulting contract.

The purpose of Generic Standards (GSs) is to help ensure that the goods or services purchased by Openreach meet:

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- Statutory requirements of safety and environmental standards,
- Requirements unique to the Openreach business and those of its customers,
- Performance requirements over their entire life cycle.

The Standards are reviewed at least annually to take account of legislative and regulatory changes.

Information on BT Group's procurement arrangements is available from the Internet at http://www.selling2bt.bt.com/index.htm.

Once in use all plant and equipment is subject to scheduled maintenance. All equipment is formally inspected and where necessary calibrated to scheduled programmes. As part of engineers' basic training they are instructed how to make daily and pre-use inspections of the equipment they use. Defective items are immediately taken out of service.

BT Group also has a division, BT Fleet, which acts as a vehicle hire company within the Group. It arranges supply of all vehicles and runs a national network of garages to repair and maintain the liveried vehicle fleet and most cars.

10. SUB-CONTRACTORS

Where Openreach uses subcontractors, an integral part of the selection process is the assessment of the tenderers safety competence and safety aspects of their work procedures.

For all contracts let since September 2009 Openreach requires its Service Suppliers to have achieved SafeContractor accreditation as a basic assurance of their competence to undertake contracted work on the UK mainland.

Prior to that date, and still for certain contracts, safety competence was and is also assessed by use of Openreach's relevant Generic Standards (GSs). The standards form part of the initial tenderer selection process and the Invitations to Tender. The Relevant GS requirements ultimately form part of the contract.

The purpose of Generic Standards (GSs) is to help ensure that the goods or services purchased meet:

- Statutory requirements for safety and environmental matters,
- Requirements unique to the Openreach business and those of its customers,
- Performance requirements over their entire life cycle.

The Standards are reviewed at least annually to take account of legislative and regulatory changes.

Information on BT Group's procurement arrangements is available from the Internet at http://www.selling2bt.bt.com/index.htm.

On being awarded the contract, service contractors are required to work to BT's stringent safety requirements.

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These are outlined on the BT Group website, "Working with BT - Contractor Health and Safety" from where the Contractor Safety Information and Guidelines document can be downloaded as a PDF file.

Method Statements produced by contractors are approved by the Openreach manager responsible for the work before being passed to the customer. The work is monitored to ensure the required standards are being met.

11. MEMBERSHIP OF SAFETY GROUPS

Openreach, and BT Group as a whole, is represented on many industry committees and organisations that influence national safety policy and regulation such as the Confederation of British Industry and British Standards Institute. It encourages relevant staff to join and support the work of the Institution of Occupational Safety and Health, the safety practitioner's professional body.

12. SAFETY PERFORMANCE AWARDS

Our road safety campaign 'Drivewise' which consisted of briefing materials, video, attitude modulation and corrective driver training has been widely acclaimed and won numerous awards at film and media events worldwide.

BT Group continues to drive down vehicle accidents through this initiative.

In 2013 BT was a BRAKE 'Fleet Safety Analysis and Action' award winner and highly commended for 'Company Driver Safety – larger fleets' and 'Road Risk Manager of the Year' categories.

In 2014 BT was a BRAKE 'Fleet Safety Partnership' award winner with Interactive Drive Systems, and highly commended for the 'Fleet Safety Innovation' award.

Individual lines of business operate safety award schemes to enhance visibility of safety within their business and the BT Group board encourages this devolved approach.

Openreach was highly commended by the Association for Project Management on its behaviours-based health, safety and wellbeing programme in 2014.

13. JOINT CONSULTATIVE COMMITTEES

BT Group holds formal meetings, known as Joint Consultative Committees, with representatives from the trade unions that represent its employees. There is a National Health and Safety JCC, chaired by the BT Group Employee Relations Manager, addressing company wide issues. There are other committees that align broadly with BT Group's Line of Business and business unit structure. Within Openreach, the various Health and Safety Champions chair these business meetings. They deal with health and safety issues across the unit. The Health and Safety Champions are senior operational managers in the unit and are able to deliver the health and safety agenda. BT Group policy demands that the Line of Business Health and Safety Champion is a direct report to the business chief executive.

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Ad hoc sub-committees are formed from these meetings to examine certain issues or deal with specific safety problems.

14. QUALITY

Our quality policy is to understand and meet (or exceed) all of our customers' quality expectations, and to efficiently deliver our business objectives through reliable processes, which are continually reviewed and improved.

This quality policy involves a number of elements:

- Supporting the development and delivery of a business strategy focused on our customers, and other stakeholders' needs.
- Periodically diagnosing the business capability of our operations, and our people, through systematic self-assessment against a recognised model of excellence.
- Effectively managing and improving the quality of our processes, products and services; and our impact on the environment in which we operate.
- Recognising and rewarding great quality performance, from both teams and individuals.

When taken together, they form a framework within which each of the BT businesses can determine its own quality approaches in order to meet (and exceed) its specific customer and stakeholder needs and expectations.

We are proud of our reputation as a quality organisation, and have been using total quality principles since the mid-1980s.

We are founder members of both the

- European Foundation for Quality Management (EQFM http://www.efqm.org/),

and

- British Quality Foundation (BQF www.bqf.org.uk).

We are also members of the forum for Quality Excellence for Suppliers of Telecommunications (QuEST www.questforum.org).

We have implemented soundly-based management systems across all of our operations, worldwide.

- Our quality management system was first registered to the ISO9001 standard in 1994 and is one of the largest registrations for a service company in Europe.
- Our telephone metering and billing processes, procedures and systems are approved by the British Approvals Board for Telecommunications (BABT).

We have been using business excellence as a management methodology since 1992, and have received numerous awards for our approaches to quality and business excellence – including the UK and European Quality Awards.

We also use a range of quality improvement approaches, based on the Deming (plan-do-check-act) cycle, including Six-Sigma and performance accelerator techniques.

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We aim to make every customer experience simple and complete - by having the passion to do the right things, and the discipline to do them right.

15. ENVIRONMENTAL POLICY

Openreach is committed to minimising the impact of its operations on the environment by means of a programme of continuous improvement. Openreach has an Environmental Policy and is actively encouraging its employees to follow sound environmental practises. To champion this policy within the group Openreach has an Environment Unit.

Openreach is committed to use materials and work processes which impact as little as possible on the environment, and has a comprehensive programme for targeting and monitoring the environmental improvement in its operations.

BT Group obtained accreditation to ISO 14001 in 1999 for its UK operations. BT Group is one of the largest companies to have achieved certification to this international environmental management system standard. The accreditation is awarded by Lloyd's Register Quality Assurance (LRQA). BT Group is implementing a country by country rollout of ISO 14001 accreditation to its non UK operations.

BT Group's Environmental Policy contains the following commitments:

BT Group is committed to the prevention of pollution and minimising the impact on the environment of its operations globally. In particular, we will contribute to initiatives that seek to address climate change. Through a programme of continuous improvement BT Group and its wholly owned subsidiaries will:

- Meet all applicable legislative and other requirements, and where appropriate exceed or supplement these by setting our own exacting standards,
- Seek to reduce consumption of materials in our operations, reuse rather than dispose whenever possible, and promote recycling and the use of recycled materials,
- Design energy efficiency into new services, buildings and equipment and manage energy wisely in all operations,
- Reduce wherever practicable the level of harmful emissions,
- Develop products that are safe to use, make efficient use of resources, and which can be reused, recycled or disposed of safely,
- Work in partnership with our suppliers to minimise the impact of their operations on the environment,
- Seek to minimise the visual, noise and other impacts on the local environment when siting our buildings, structures and equipment,
- Work with external groups and organisations to promote the concepts and practices of environmental protection,

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- Include environmental issues in discussions with the BT Group unions, the BT Group training programmes and encourage the implementation by all BT Group people of sound environmental practices,

- Monitor progress and publish details of our environmental performance in our Social and Environment report, as a minimum, on an annual basis.

The Company's environmental management system will monitor delivery of these commitments.

The policy is available at:

https://www.btplc.com/Purposefulbusiness/Ourapproach/Ourpolicies/Environmental_Policy.pdf

It forms part of our Purposeful Business strategy which can be accessed via: http://www.btplc.com/Purposefulbusiness/Deliveringourpurpose/index.htm

16. INSURANCE AND INDEMNITY

BT Group insurance certificates are included at the end of this document. BT Group maintains insurance cover to meet all statutory and commercial liabilities placed upon it.

BT Group's standard terms and conditions will apply. This is in keeping with the requirements of BT Group's telecommunications operator's licence. Alterations to the standard terms and conditions can only be made by specific negotiation. Such changes must be agreed in writing and be relevant to the specific contract. In every case these changes have to be ratified by BT Group's insurers.

17. CONSTRUCTION (DESIGN & MANAGEMENT) REGULATIONS 2015

The principles of CDM have been incorporated into our global BT project safety management minimum standards.

Our overall approach

Where project safety is dependent on the co-operation and co-ordination of parties (either internal or external) the principles outlined within our Project Safety Management minimum standards must apply.

CDM will also apply where projects:

- Last longer than 30 days and have more than 20 workers working at the same time or
- Exceed 500 person days
- Involve more than 1 contractor working simultaneously on a site
- Involve excavation more than 3 metres in depth
- Include use of underground directional drilling or mole ploughing
- Involve heaving lifting operations (using mobile cranes) within proximity of members of the public or others

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- Use novel or new methods of construction
- Involve work at height which is not normal practice
- Involve significant alteration of building structure or addition of new plant
- Include heavy cable recovery using mechanical means

Extra consideration will be given to projects where:

- Work involves significant interaction with members of the public (eg street works requiring traffic management)
- Major works in the highway need to take place
- Work is in an unusual location (eg on or near water)

In these circumstances it may be appropriate to apply the principles of CDM.

Business as usual approach

Where we do simple, 'business as usual' work, we will ensure the safety of those involved using our normal risk assessment and safe system of work processes.
This will include activities such as:

- Provision of new data / telephone line(s) to domestic or commercial property
- Repairs to circuits (within the highway or domestic or commercial premises)
- Removal & replacement of cables (like for like replacement)
- Replacement of existing service with new cable type (in existing ducts)
- Jointing of cables
- Work at street furniture cabinets
- Battery cell replacement (emergency repair)
- Routine maintenance to electrical systems and equipment
- MDF jumpering
- Small maintenance works (single person working or ≤ 8 hour work content)
- Emergency works requiring immediate attention to maintain critical services (within first 24 hours of response)
-

18. FIRST AID AND WELFARE PROVISIONS

BT Group complies with The Health and Safety (First Aid) Regulations 1981 and takes account of associated Health and Safety Executive guidance.

All BT lines of business are responsible for ensuring that adequate first aid provision and information is in place for their people and will co-operate to ensure that suitable numbers of first aiders are in place.

It is a mandatory requirement that all Openreach liveried vehicles carry a vehicle first aid kit. The Line Manager is responsible for regularly checking that such vehicles contain a first aid kit and that the correct contents are contained within.

BT Group also has an employee-counselling department available to all employees. BT Group has initiated schemes to address the issue of work related stress and has been a leader in this field.

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In line with the HSE's first aid advice for travelling, remote and lone workers, in Openreach engineering every one of our commercial vehicles has a standard first aid kit which is inspected annually, and every engineer carries a mobile phone which can be used in emergencies. This also allows the engineer to interact with our internal Duty of Care system.

This approach we've assessed as meeting the vast majority of our first aid needs, however where there is a specific risk identified in a task, we will provide additional first aid training appropriate to cover this. A typical example of this is where our engineers work in 3rd party powered street furniture, where they will attend G39/1 industry recognised training including a specific element on emergency first aid covering what to do for someone who may have received an electric shock. Where a specific risk has been identified, this will be stated within the appropriate task statement along with its corresponding control measure.

19. HOUSEKEEPING

So far as is reasonably practicable Openreach's work activities will be kept clean and tidy for the duration of the contract and access to the work location will be controlled to discourage unauthorised entry. Surplus materials and waste will be removed as necessary to ensure that a good standard of housekeeping is maintained.

20. HANDOVER

All surplus stores, tools, and equipment will be removed from site prior to handover. All waste materials and packaging will be disposed of safely in accordance with statutory requirements and the site will be left clean and tidy.

The customer's site representative will be advised that the contracted work has been completed and will be asked if a demonstration or further assistance is required. When the customer is satisfied with all aspects of the work Openreach's people will advise that they are leaving the site.

End

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Appendix 1 – BT Group Corporate Health and Safety Policy Statement

BT has a set of values which we expect you to demonstrate in carrying out your job.

The following policy should be read alongside 'The Way We Work', our overall policy on ethical behaviour and how we expect you to behave at work. If something doesn't make sense to you, or you have any reservations, please talk to your manager or HR.

Global statement

We believe that health, safety and wellbeing are critical contributors to our future commercial success.

BT cares about its people and will take a positive approach to their health, safety and wellbeing through the promotion of healthy behaviours to help them avoid illness or injury arising from their work or their lifestyle.

Who this affects

This policy applies to all BT employees employed within the BT Group based in the UK subject to their terms and conditions and all people that may be affected by our operations as required by local law.

Our aim

Wherever we operate we will:

- strive to prevent any physical or psychological harm caused by our commercial activities
- make sure that our people are given effective protection in the workplace

Our guiding principles

Whilst acknowledging and accepting our legal obligation to protect the health and safety of all who may be affected by the way we work, we also recognise the need to keep our people engaged and motivated as an enabler of excellent business performance.

We believe that this occupational and social approach to health is the most effective means of ensuring our people are able to thrive in the modern commercial environment.

Our goal is 'zero avoidable harm'. To achieve this goal, we will commit resource and effort as well as measuring ourselves against publicly available targets.

Management teams will ensure that health and safety is a core consideration of planning, delivery, monitoring and review processes at a strategic and operational level. This is a responsibility that

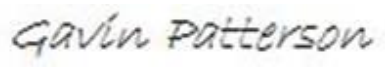
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must be shared by all our people whether they undertake tasks themselves or supervise the work of others. We will equip all our people with skills through the provision of information, instruction or training to enable them to contribute fully to our aims.

In support of the operational management teams, a network of Safety Champions or an equivalent service[1] has been established in many countries to provide oversight and challenge where operational management decisions have the potential to compromise these objectives. A network of Safety Professionals is in place to provide technical advice into the business supported by external consultancy as necessary.

Where they exist Trades Unions and Works Councils or equivalent employee groups also play an important role in the delivery of health safety and wellbeing performance. BT is committed to meaningful and constructive joint working with these groups through formal consultation and informal partnership arrangements as part of its delivery strategy.

[In addition, BT is committed to compliance and adherence to federal and state health and safety laws and regulations, as applicable. However, nothing in this Statement shall confer any rights or obligations on the Company or its workforce beyond which is required by applicable law].



Gavin Patterson

CEO BT plc

Compliance

We appreciate that the vast majority of BT employees act professionally and in line with BT's Values but if you do behave in a way that is inconsistent with this policy or The Way We Work, BT may take disciplinary action depending on local legislation and regulation.

Policy owner

Dave Wallington

Group Safety Advisor

Review

January 2017

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Appendix 2 – Certificate of Employers' Liability Insurance

XL Group
Insurance
Reinsurance

XL House
70 Gracechurch Street
London EC3V 0XL, United Kingdom
Phone +44 (0)20 7933 7000
Direct +44 (0)20 7933 7487
Fax +44 (0)20 7469 1025
www.xlinsurance.com

To Whom It May Concern

Employers Liability Insurance

This is to confirm an Employers Liability Policy has been issued by XL Insurance Company Plc to the insured named below in accordance with the following details. This letter is only for information and does not confer any rights upon the holder. The rights and liabilities of the parties will only be governed by the original policy including any amendments that may be agreed upon from time to time.

Insured:	BT Group Plc and all Subsidiary Companies
Policy Number:	GB00027385LI016A
Business:	All activities of the Insured as detailed to the Insurer
Period of Insurance:	From 1st April 2016 to 31st March 2017 both dates inclusive
Limit of Indemnity:	£10,000,000 any one event

Subject otherwise to the terms exceptions and conditions of the policy.

Nothing herein contained shall in any way be held or construed to alter or waive or vary any of the terms conditions or provisions of the policy.

For full particulars of the insurance please refer to the policy document

Signed :

Dated : 29th March 2016

XL Insurance Company Plc, Registered office: XL House, 70 Gracechurch Street, London, EC3V 0XL
Registered No. 01884214 England

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Appendix 3 – Certificate of Public Liability Insurance

Communicator

Address Correspondence to:
BT Group Insurance & Risk
BT Centre
pp A3X
81 Newgate Street
London EC1A 7AJ
insurable.risk@bt.com

To whom it may concern:

CERTIFICATE OF INSURANCE

STANDARD TERMS AND CONDITIONS

This is to certify that we have effected a policy of insurance which will indemnify BT Group PLC and all subsidiary companies as follows:

Coverage	**Third party legal liability** in respect of legal liability attributed to BT Group PLC and/or Subsidiary and/or Associated Companies for injury to persons and/or damage to property of any third party occurring in connection with the business subject to the terms and conditions therein.
Geographical limits	Worldwide (subject to any local statutory or regulatory requirements)
Period of insurance	1st July 2016 to 31st March 2017 (both dates inclusive)
Insurer	Communicator Insurance Company Limited
Policy number	COMM070
Limit of indemnity	£10,000,000 (ten million pounds Sterling) per occurrence arising from the one event
Additional clause (a)	Products liability cover is included within this policy with a Limit of Indemnity of £10,000,000 (ten million pounds Sterling) per occurrence and in the annual aggregate
Additional clause (b)	Professional Indemnity cover is included within this policy with a Limit of Indemnity of £10,000,000 (ten million pounds Sterling) per occurrence and in the annual aggregate
Deductible (excess)	£10,000 franchise per occurrence

A wholly owned subsidiary of BT

Signed:

Authorised signatory, Communicator Insurance

Communicator Insurance Company Limited
Place of Business:
Third Floor
St George's Court, Upper Church Street
Douglas, Isle of Man IM1 1EE
Registered in the Isle of Man
Registered No 102908

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