

 vedanta transforming for good	Vedanta Guidance Note
Document Name	GN-43 GUIDANCE ON VFL & EMPLOYEE ENGAGEMENT FOR BUILDING PROACTIVE SAFETY CULTURE TRANSFORMATION
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1. Introduction

1.1 Proactive Safety Culture: -

For achieving zero Harm, it is required that safety culture transform from Reactive culture to Proactive culture. For this, Employees must transform mindset from compliance mode to commitment. This Guidance Note presents the framework for effectively utilizing the Leadership time and ensure that Employees are engaged in building a proactive Safety Culture.

There are four phases of this transformation.

1. Natural instinct - People don't take responsibility and believe accidents will happen.
2. Dependent Stage - People view safety as following rules. Accident rates decrease.
3. Independent Stage - People take responsibility and believe they can make a difference with actions. Accidents reduce further.
4. Interdependent Stage - Teams feel ownership and responsibility for safety culture. They believe zero injuries is an attainable goal.

Dupont's Bradley's curve for understanding and driving to Great safety culture



1.2 Coverage and guidance on Initiatives

This Guidance is aimed at Building Proactive Safety Culture at all Vedanta Operations. This required a shift from learning only from incident to Making sure our employees and leadership is spending time on ground for improving safety before incidents by way of planned site rounds and engaging with employees. The Guidance note details initiatives to be followed across Vedanta for improving safety culture.

The below initiatives are covered under this guidance note:

1. [Visible Felt Leadership](#)
2. [Safety Interaction](#)
3. [Hazard/ Safety Observation Rounds](#)

VISIBLE FELT LEADERSHIP

2. Visible Felt Leadership

Visible Felt leadership is the management's total actions that lead people at all levels to understand and "feel" their leaders' high standards and accept their strong commitment to safety as being genuine, caring, and respectful.

"If you put good people in bad systems, you get bad results. You have to water flower; you want to grow" – Stephen Covey

The aim of visible felt leadership is to get line leaders in the field interacting with employees on a regular basis and having positive conversations around safety.

For great safety culture, mindsets and behavior must be addressed at every level from leadership to shop floor as every level will look "up" to see which behaviors are being role modelled by their leaders. Unless behavior becomes habits, great safety culture cannot be achieved.

Sum of individual behavior will become individual performance and sum of individual performance become organizational performance. Visible felt leadership lead to Operational discipline and make individual behavior for safety, a habit.

2.1. Who will be covered under Visible Felt Leadership?

All leaders, including Business Partners Leaders shall be covered in the VFL program:

1. **Corporate Leaders at Business level-** Chief executive Officer, Chief Operating Officer, and other Line Function Heads
2. **Corporate Enabling Function Leaders at Business level-** Chief Commercial Officer, Chief Financial Officer, Chief Human Resource Officer, and other Enabling Function Heads
3. **Location based Leadership-** Chief executive Officer, Chief Operating Officer, Directors, Location Head, Location Finance Head, Location Chief Commercial Officer/ Location Chief Human Resource Officer, and Other Function Heads
4. **Unit based Leadership-** Unit Head, Unit Finance Head, Unit Chief Commercial Officer, Unit Chief Human Resource Officer, and Other Function Heads)

Similar structure needs to be identified for the leaders of BP who shall be trained for carrying out VFL on site.

2.2. Uniform Visible Felt Leadership Guidance for Vedanta Leadership:

All the initiatives which can help Leaders to lead Effective Visible Felt Leadership for common and easy reference is listed. Building and sustaining positive safety culture is one of the key responsibilities of the leadership team. How employees "feel" the leadership, through their interactions, decisions are important aspects of Visible Felt Leadership. VFL is a serious, important, and continuing process of engagement. As such, each engagement should be planned and the sum of time spent on VFL activities may be measured by actual time spent in

the field, the number of Safety Interactions, Hazard Tours, Toolbox Meeting participation etc. or a combination to achieve the “Time in field” expectation for Senior Leaders (25%) through to Front Line Leaders (80%). Planning the metrics should also consider factors such as remote worksites (underground mines; offshore oil platforms etc.). Following initiatives shall be considered for effective VFL outcomes for leadership.

2.2.1. Lead By Example- Self Safety focus:

Leaders must ensure to

1. **Walk the talk** – follow all safety rules meticulously on the job as well as off-the-job
2. **Stop work themselves**, if anything unsafe is taking place, correct the same and encourage everyone to do so.
3. **Safety standards awareness** – All leaders spare personal time to get trained on Vedanta standards and ensure all employees are also trained on these standards.

2.2.2 Engage with employees on ground:

The idea is to have boots on ground and ensure that Leaders are engaging with employees on safety and have actual feedback of situation on ground.

Following are the ways in which our leaders will engage with larger employee base.

1. **Safety Interaction**- Its One-on-One personal discussion with Focus on personal unsafe behavior improvement.
2. **Gemba Walk / HSE Coach Visit/ Checklist Based Hazard Tour** - It’s a planned joint leadership site round aimed to be conducted with UH/FH/ Area In charges / BP site in charge with focus on critical observations and compliances on ground. Observations needs to be recorded, monitored, and closed by fixing responsibility on the spot. It gives leaders opportunity to understand gaps and drive effective improvements at site including housekeeping, and other softer issues which employees faces on ground etc. Few youngsters can be attached in VFL round with leaders to provide them exposure.
3. **Critical Risk Management**-CEOs and other leaders will at least conduct one CRM on ground verification with Line function and Business Partners to gauge effectiveness of deployment. This shall also be done along with Area In charge / UH / BP site in charge.

2.2.3 Review Safety performance of facility/department at a defined frequency

1. **Chair/ participate in safety committees / Reviews** – Review Safety System implementation effectiveness, CRM Exceptions, (Daily/weekly/monthly) Leading and Lagging performance, Fatality & VSAP CAPA, Infrastructure matrix, Penalty/reward.
2. **Review incident reports, drive actions to prevent recurrence**- Review of quality of incident investigation for critical incidents driving the need to prevent reoccurrence through CAPA implementation & fixing accountability.
3. **Business partner safety review**- Business partners play crucial part in building safety culture and Dedicated HSE Review of BP at various levels of management helps in improving HSE performance of business. Senior leadership from BP shall be involved for HSES review.

4. Ensure audits are carried out and CAPA actions are closed. (VSAP, SPSA Etc.)

2.2.4 Demonstrating Accountability

1. Prepare Personal Safety Action Plan (for self and ensure everyone reporting to you also prepares the same) covering #1,2,3 above.
2. Review it periodically, coach reports for safety, encourage them to do the same with their reports.
3. Encourage employees to undertake safety improvement projects, Drive compliance to Various CAPA proactively.

2.2.5 Expectation Setting-Communication:

It is important that Leaders always demonstrate high safety values in their communication thus setting right expectations from employees. Following are various ways for effective safety communication to last person on ground.

1. Town hall, Safety chaupals, Safety standdown, Safety group meetings – Leaders must conduct or participate in these meetings and clearly communicate its expectations.
2. Recognize “good behaviors” publicly (Employees of the week/month, Rewarding employees on safety kaizens / Projects, Safety committees, Safety heroes etc)
3. Communicate on empowerment and importance of stopping any work if they find it unsafe.

Based on above guidance each business shall develop their VFL program covering these initiatives and ensure their key leaders as well as business partner leaders are mapped in this program. Site ESG team shall maintain the compliance tracking of these VFL schedules as a good practice and ensure all leaders are contributing to developing positive safety culture. The observations shall be logged in software for tracking and compliance. The table below is provided as an example being used at one of Vedanta sites for taking a reference and setting your own VFL document.

Table 1 A Sample VFL program is attached above for ready reference (Being followed at one site)

Sl. No	Inputs	Measure / Records	Corporate Leaders at Business level	Corporate Enabling Function Leaders at Business level	Location based Leadership	Unit based Leadership
1	Safety Interaction	No per month	1	1	4	4
2	Gemba Walk / HSE Coach Visit/ Checklist Based Hazard Tour	No per Month	1	1	1	1
3	PSAP	Quarterly review of reportees	1	1	1	1
4	Safety Performance Review	Attendance & MOM	Business HSE Performance review	Business HSE Performance review	Location / BU HSE performance review	Unit HSE performance review
5	Critical Risk Management	per month	Progress review and One site verification round	Participate in 1 CRM Reviews	Progress review (CEO/COO/LH) One site verification round (All)	Progress review (UH/EH) and One site verification round
6	Fatality, HIPO & LTI Incident Investigation and CAPA Review	Nos.	1 review for business	Participate in 1 Reviews for business	1 review for Location	1 review for Unit
7	Mass Communication with Employee	Nos.	HSE Townhall	HSE Townhall	Monthly Gate Meeting	Safety Chaupal at Shop floor
8	Know Vedanta standards - Self reading and assessment	Nos.	1	1	1	1
9	One HSE projects per Quarter	Projects per quarter	1 project mentored with Youngsters driving it	1 project mentored with Youngsters driving it	1 project mentored with Youngsters driving it	1 project mentored with BP/Employees driving it
10	Monthly review meeting with BP	Nos.	One HSE review with CEO/Director of One BP	One HSE review with CEO/Director of One BP	Top 3 BP HSE review with their Senior leadership	BP HSE Score card Review with Site leadership
11	Safety Call	Nos.	Daily MIS - closure of critical and Fatal observations in 24 hrs	NA	weekly Safety call for Location at COO level	Daily Safety review in Morning call

SAFETY INTERACTION

3. Safety Interaction

Safety Interaction is a structured pro-active two-way safety conversation with employees at their workplace to positively influence people’s personal behavior towards safety in order to:

- Recognize and reinforce positive safe behavior
- Identify and correct at-risk behavior
- Engage in conversation regarding safety concerns and issues.

The safety interaction shall be conducted at a scheduled frequency in the field and discussion on issues other than safety should be avoided during the Safety interaction round. The primary focus should be on observing and correcting the behavior of persons working in the workplace and demonstrate care for employee.

Each safety interaction round shall preferably be of 1 hour duration. During this process, the Six-Step Safety Interaction process should be followed to reinforce positive acts and behaviors, Take promise for future safe behavior and discuss any other safety-related support required by person.

HSE team shall identify and train the employees who shall be conducting the SI in field.

3.1 The Six Step Process

1. **Observe**, decide how to approach the Contact (the person who is interacted with), and stop the unsafe act SAFELY.
2. **Comment** on positive safe acts/ behavior.
3. **Discuss any Unsafe/ At-Risk Behavior observed.** – We shall avoid the one-way commentary and focus on encouraging the person to speak and identify issues himself.
 - Discuss consequences (possible injury) of the unsafe act/ behavior.
 - Encourage the Contact to discuss safer ways to do the job & arrive at a conclusion.
4. **Get Agreement** to work safely in future.
5. **Invite** the Contact to discuss **other safety issues** in the workplace.
6. **Thank** the contact for his time and commitment.

3.2 Who will be doing the Safety Interactions?

Each site ESG head shall create a SI schedule with aim to

- **Covering all locations of site.**
- **Cover all people who are supposed to carry out SI**
- **Ensure SI is done in all the shifts for round the clock coverage.**

Category	Min. Frequency	Reporting
Senior Leaders	As per VFL scorecard	Reporting & tracking in V- Unified software and high focused analysis to drive interactions
All Trained Executives (till M7)	Min 1/ Week	
Safety Officers	Min 6/ Month	
BP Management team – In-charge (Site, Technical & Safety)	Min 1/ Week	

3.3 Traps & Tips

X Traps	✓ Tips
Not being prepared	Have a plan; firstly, discuss ways to prevent injury in the immediate task. Secondly, if the task is well managed, have some messages and safe habits that you can reinforce.
Not introducing yourself.	Always introduce yourself.
Announcing that this is a safety observation/SMAT/STOP	This is normal work, be natural in the introduction.
Not recognizing safe behavior	"I see you've thought about ... Thank you for choosing a safer behavior".
Focusing on unsafe conditions	Focus on behavior.
Using closed questions, e.g. "Do you think you can get injured working like that?"	Use open-ended questions e.g. "How do you think you can get hurt?" "What could go wrong?" "What can you do to prevent it?"
Focusing too much on the chance of injury e.g. "How likely is it to happen?"	Discuss the consequences e.g. "How bad can it be?" Make it personal to the employee.
Assuming that the task needs to be done.	Question the purpose of the work. "What are you trying to achieve here?" "What's the purpose of this work?"
Taking all the follow-up work on yourself or not obtaining commitment from the employee to take on safer ways of working.	Gain an unequivocal commitment from the employee to get the work done more safely, which reinforces for them to take control of their work area.
Drifting off the subject of safety.	Stay on track, talk about other issues once the safety message has been made but keep it brief.
Taking out your note pad and writing in front of people.	Capture the information later and minimize the information required. Make any notes freely available to individuals should they wish to view them.
Overwhelming people with too many observers and questioners. If possible, avoid any more than four in the discussion group.	One is natural, but typically no more than two observers. Position the discussion so as to minimize onlookers and interruptions.
Not thanking the person/people.	Always be polite – it's good social process.
No communication of results to employees.	Visibility of results and discussions in work group on improvement ideas.
No follow-up of action items.	Ensure all actions are completed and communicated to employees.



HAZARD/SAFETY OBSERVATION TOURS



4. Hazard/ Safety Observation Tours

4.1 What is a Hazard?

In Vedanta we define hazard as “a source of potential harm”.

4.2 What is Hazard Identification?

Hazard identification is part of the process used to evaluate if any situation, item, thing, etc. may have the potential to cause harm. The term often used to describe the full process is risk assessment:

- Identify hazards and risk factors that have the potential to cause harm (hazard identification)
- Analyze and evaluate the risk associated with that hazard (risk analysis, and risk evaluation)
- Determine appropriate ways to eliminate the hazard; or control the risk when the hazard cannot be eliminated.

Overall, the goal of hazard identification is to find and record possible hazards that may be present in the workplace. It may help to work as a team and include both people familiar with the work area, as well as people who are not - this way you have both the experienced and fresh eyes to conduct the inspection.

4.3 What is the process of Identifying Hazards?

- Stop for a few seconds (10-30) before entering an area to identify where people are working.
- Use all senses: sight, hearing, smell, touch. Note anything unusual so that you can ask about it e.g., “what was that noise?”, “is that normal?”
- Look above, below, behind and at the activity.
- In your mind think about the hazards involved in the activity for more and less safe acts.
- Ask yourself questions about the critical behaviors of people such as:
 - If anything went wrong, is that person in the line of fire?
 - Is that person taking care to watch where his/her hands are?
 - Is that person trying to do too many things at once?

4.4 When Should a Hazard Tour To Be Done?

Hazard Tours can be done:

- During design and implementation
 - Designing a new process or procedure
 - Purchasing and installing new machinery
- Before and while the activities are being done
 - Identify and analyze the hazard by carrying out a risk assessment
 - Determine controls to eliminate or control the risk.
 - Implement and ensure that the required controls are in place.
 - Review and check each required control before each shift
- During inspections and audits

- After every incident

In order to ensure, round the clock and adequate safety supervision on the ground, each business need to Engage employees for identification of Hazards, Risk mitigation and its implementation through initiatives like Hazard Tours. The Proactive culture can be built, when all employees take responsibility and believe they can make a difference with their actions. It's important that we engage them and create sense of ownership and responsibility for building proactive safety culture. Every Businesses need to ensure following initiatives are driven with aim to engage employees on identifying hazards and carrying out hazard tours for building safe workplace: -

45 Hazard tour / Safety Observation Tour/ One Day Safety Officer - The goal of safety observation / ODSO is to have boots on ground and identify Hazards (a source of potential harm), Unsafe conditions / Unsafe Acts and take immediate steps to either stop and correct or Report for compliance. All serious and Fatal potential observation shall lead to stoppage of work till its compliance. All these observations shall be recorded and tracked for closure through V Unified software.

- All employees including BP employees, who are not covered as part of SI/VFL program shall be engaged for doing Safety observations tours / ODSO- One day Safety Officer (Including BP Field Supervisors and field workforce) to train their eyes for identifying hazard and build safety ownership.
- Each site shall either prepare a Site wise schedule (including BP on ground employees and supervisors) and encourage their BP to run these scheduled rounds for their employees too.
- The schedule shall be cover all locations of Plant and shall be conducted in all three shifts

46 Night Duty Officer

As our sites operates round the clock, it's important to maintain leadership presence and supervision of our operations during odd hours especially from view of HSE perspective. In order to ensure this each site shall identify and prepare the list of leaders (Upto Department heads including Support function leaders) for a roaster to cover HSE and security aspects during odd hours including emergency handling. The leaders will act as proxy to site leadership during this time and help observe HSE and other compliances during night shift. Each site shall prepare a checklist and areas to be visited for these rounds for effective implementation and full site coverage. Site can identify and attach youngsters and BP employees along with identified leaders to support NDO rounds.

Objective of this programme is to ensure:

1. Round the clock availability of people to observe safety and other issues.
2. Take decisions during any emergencies at site.
3. Cover 100% site with objective to take action or report.

Each business shall develop their schedule for NDO involving Leader, Employees and BP for covering overall sites on HSE and other compliances.

The report of ODSO/NDO shall be submitted to CHRO/SBU Director/UH for action on next day.

ABBREVIATIONS

1. CEO-Chief Executive Officer
2. CCO-Chief Commercial Officer
3. CFO-Chief Financial Officer
4. CHRO-Chief Human Resource Officer
5. COO-Chief Operating Officer
6. LH-Location Head
7. EH-Engineering Head
8. UH-Unit Head