



2011 PROGRESS REPORT OCCUPATIONAL HEALTH & WELLBEING

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VISION

The UK Electricity Industry will be a world leader in health and safety performance by 2015.

STRATEGY

ENA and AEP member companies (now Energy UK generation members) and trade unions commit, with the support of HSE, to build on our partnership approach to bring about continuous improvements in the management of safety and occupational health in the electricity sector in the 5 years leading up to 2015. We will do this by supporting the priorities in the HSE strategy, in particular the themes of leadership, worker involvement and improving competence, and to proactively managing the risks that cause real harm and suffering.

The strategy covers the electricity generation, transmission and distribution sectors. See Appendix 1 for companies that formally support the strategy.

In line with HSE's strategy, three over-arching themes will run throughout the lifespan of Powering Improvement: leadership, improving competence and worker involvement.

To maintain momentum each year the strategy will focus on a specific topic which has been identified as a priority area for our sector. Each theme will be led by a senior industry champion.

- > 2010 Leadership
- > 2011 Occupational health & wellbeing
- > 2012 Asset management & maintenance
- > 2013 Behavioural safety & personal responsibility
- > 2014 Beyond 2015 Next steps

Further information can be found in the full strategy document which is available on the Powering Improvement website at www.poweringimprovement.org

Governance

Powering Improvement is managed and directed by the National Health and Safety Advisory Committee (HESAC) (comprising representatives from AEP and ENA member companies, the industry trade unions (GMB, Prospect, Unison and Unite) and HSE. National HESAC has been operating as a tripartite body successfully addressing health and safety issues in the electricity industry for over 30 years.

Executive decisions on behalf of ENA member companies rest with the ENA SHE Committee and ultimately the ENA Board. Executive decisions on behalf of AEP companies rest with the AEP Health and Safety Forum and ultimately the AEP Board.

REVIEW OF 2011

The second year of Powering Improvement focused on occupational health and wellbeing. The intention was to bring about a sustainable reduction in the numbers of work-related ill health incidents in our sector by engaging and raising the awareness of employees and providing support to company occupational health initiatives. In terms of what success at the end of the year would look like, it was envisaged that ENA and AEP member companies would:

- > be aware of their significant work-related health risks
- > know where to access the information, support and advice they need, enabling them to take action to prevent and effectively manage work-related ill health risks
- > have plans in place ensuring those best placed to do so are tackling the causes of work-related ill health

At the core of the year were six commitments that were fully supported by AEP and ENA member companies:

1. To discuss and clarify at board level the commitment to successfully manage occupational health risks.

2. To identify the top three health risks and ensure they are being effectively addressed.

3. To ensure that health surveillance & fitness for work assessments are being delivered to national & legislative standards.

4. To review approaches to the management of stress and identify opportunities for improvement.

5. To develop policies for the rehabilitation of individuals back into the workplace and consider a fast-track physiotherapy approach to the management of MSDs

6. To raise awareness of the importance of workforce involvement, specifically health & safety representatives and other workers'

representatives, in the management of Occupational Health and support them in carrying out health related activities to support the delivery plan throughout the year.

The six commitments were aligned with activities that have been shown to have a demonstrable impact on improving the occupational health performance of organisations and were supported by training and guidance materials developed by the ENA Occupational Health Committee under the direction of the ENA SHE Committee.

The approach to delivering these commitments was aligned to Powering Improvement's three over-arching themes:

Leadership

The key to success in the promotion of Occupational Health is the commitment of senior management in ENA and AEP member companies, highlighting the importance attached to health and wellbeing issues that impact on the workforce.

Competence

Throughout the year the ENA Occupational Health Committee developed guidance and other information to support each commitment area by gathering together and making available best practice material sourced from member companies and trade unions. The implementation of wider Government health policies was also reflected within the material. All of the guidance developed was made available on the Powering Improvement website.

Support material was produced for Safety and Health professionals in each of the businesses as well as practical guidance for line managers and safety representatives.

In addition, a number of training and awareness workshops were organised throughout the year for safety managers and safety representatives addressing occupational issues relevant to our sector. Further details of these are provided later in the report.

Worker Involvement

Opportunities were sought throughout the year to engage the workforce in considering occupational health issues relevant to themselves and colleagues. Examples of these can be found in the company initiative section later in this report. In addition, a number of companies closely involved trade union representatives in the programmes of their annual in-house H&S conferences.

2011 Champions

Jane Willis, Director of Cross-Cutting Interventions, Health and Safety Executive and John Crackett, who at the time was MD of Central Networks, were the two champions for the year and were actively involved in developing and launching the six commitments that formed the basis of the delivery plan for the year. As champions they personally wrote to senior management in AEP and ENA companies seeking their express commitment to the aims of the delivery plan. John changed roles early in 2011 which meant that he stepped down as champion and Jane assumed the role of sole champion for the remainder of the year.

JANE WILLIS Director, Cross-Cutting Interventions Directorate, HSE



HSE is committed to reducing work-related ill health. This is one of the key goals in our strategy **The Health and Safety of Great Britain – Be Part of the Solution**. We know it is better to

prevent ill health occurring in the first place than to have to deal with the consequences later, but we recognise that this is a shared responsibility - regulators, employers, trades unions and individuals all have a role and need to be 'part of the solution' - if we are to address the causes of ill health in the workplace.

Powering Improvement, with its commitment to strong leadership, worker involvement and competence, exemplifies this partnership dynamic and I was delighted to be asked to be Champion for the occupational health and wellbeing year. Improving health at work is no easy task and takes sustained effort, but the benefit to companies and to their employees is clear. I am pleased that this year has proved to be a year of action - not just words - on occupational health and wellbeing. AEP and ENA companies have really delivered on the agreed six commitments that address key occupational health issues for the electricity industry. Many fine examples of the activities and initiatives carried out in 2011 can be found in this report and also on the Powering Improvement website.

I am confident that the good work to tackle occupational health and wellbeing issues did not end on 31 December 2011 but will continue, with HSE support, throughout the remaining years of Powering Improvement and beyond to help the UK electricity industry achieve its vision of being a world leader in health and safety.

Your main focus now turns to the 2012 theme of 'Asset Management and Maintenance' - and I wish you every success in the coming year.

ACTIVITIES CARRIED OUT DURING 2011

Throughout the year the ENA Occupational Health Committee developed a range of guidance and tools in support of the six commitments. These can be found on the Powering Improvement website at: www.poweringimprovement.org/tools/ occupational-health-tools

Workshop held 2 February at ENA offices

A successful Occupational Health Workshop was held in February to equip participants to promote the benefits of good occupational health management in their companies. The workshop also provided more information on the six commitments that formed the 2011 Delivery Plan, with members of the ENA Occupational Health Committee taking a leading role in setting out and promoting achievable aims and goals for the year. The workshop was attended by a mixture of H&S practitioners, occupational health specialists and safety representatives from AEP and ENA companies as well as HSE.

SHE Management Conference 14 – 15 April

Dame Carol Black, the National Director for Health and Work, was a keynote speaker at the Health and Safety conference held at the Belfry near Birmingham and in addition to commending Powering Improvement encouraged the electricity industry to engage with the Government's public health and wellbeing agendas.

Managing Sickness Absence workshops April/May

During the year E.ON sponsored 3 training courses on the Strategic, Operational and Practical Aspects of Attendance Management to skill staff to manage employee health issues and rehabilitation effectively.

Parliamentary Reception 25 May

A Parliamentary Reception was held at the House of Lords terrace. Baroness Smith, Opposition Spokesperson for Energy and Climate Change, Lord Taylor, the Government spokesman on Energy and DWP and Jane Willis, HSE Director for Cross-Cutting Issues and this year's Powering Improvement Champion, all spoke and commended the electricity industry for clearly recognising the business and social benefits of successfully managing occupational health.

Workshop held 21 September at ENA offices

A second workshop was held and attended by Jane Willis in her role as champion where both ENA and AEP companies shared information on the initiatives and activities they had been undertaking to help realise the vision of Powering Improvement.

Representatives were present from the following organisations:

E.ON, National Grid, EDF Energy, Scottish Power, SSE, Inexus, UK Power Networks, Electricity North West, Northern Powergrid, and Northern Ireland Electricity.

Prospect, GMB, Unite, and Unison.

At this workshop the trade unions stated their expectation with respect to commitment 1 (To discuss and clarify at board level the commitment to successfully manage occupational health risks) i.e. that company annual reports will cite their Occupational Health developments and provide details of the joint delivery with their health and safety representatives.

SHE Reception 21 September

At the 5th annual SHE Reception Jane Willis commended the industry on the efforts that had been made in support of the six commitments and Robert Davis, Group CEO EA Technology as the champion for 2012, introduced that year's theme of asset management and maintenance.

Initiatives by ENA and AEP Companies in support of the commitments

Further details of company initiatives and activities, including a number of case studies, can be found on the Powering Improvement website.

General

E.ON funded three workshops for the industry focussing on the management of attendance and promotion of health. These were attended by a mixture of H&S practitioners, occupational health advisors, HR personnel and safety representatives from AEP and ENA member companies.

SIX COMMITMENTS

1. To discuss and clarify at board level the commitment to successfully manage occupational health risks.

Throughout the year the **E.ON UK** Executive Board fully supported Powering Improvement, with Derek Parkin MD Business Services providing the quote below in support:

"Within E.ON we recognise that our colleagues are our most valuable asset. We see the need for good business to manage health and safety well. If it does not, then the business is losing the opportunity to drive efficiency, it is accepting needless losses and more importantly could be injuring or damaging its employees. We believe that the commitments outlined in Powering Improvement have made a real and lasting difference to the health of our employees and that difference will be positive for each individual and will in turn be positive for the business.

For example in E.ON we have saved £11.8 million a year through our health interventions, we have taken 20 days off the average absence due to musculoskeletal disorders through relatively cheap and simple interventions and reduced the number of days lost due to mental health issues by 25%.

We at E.ON do not see Powering Improvement as a one off initiative but have embedded these principles within our business with the aim of building a healthier future."

UK Power Networks issued their Occupational Health & Wellbeing Strategy which includes key performance indicators and an action plan to support the Powering Improvement commitments.

RWEnpower have a Board Health & Safety Review Committee which meets twice a year and has an Independent Chair. Members include the CEO, Business Heads, Chief Medical Officer and the Head of Health & Safety. Its purpose is to determine strategy and set company and business H&S KPIs and targets, six of which relate to the management of health. The six Powering Improvement commitments were discussed by the Committee and an action list agreed for improvements.

The **Western Power Distribution (WPD)** Board demonstrated commitment by the addition of an in-house Occupational Health team and the continuing development of health interventions within the business.

With the appointment during the year of a new Board and senior managers at **Northern Ireland Electricity (NIE)**, following the purchase by ESB in December 2010, the Director of Health, Safety, Risk and Environment briefed the new Board and the senior H&S committee on Powering Improvement. To allow more time to discuss and ensure appropriate health, safety and environment governance the **Electricity North West** Board has established a board health, safety and environment sub-committee. This committee has accepted the health, safety and environment plan which contains the actions Electricity North West are undertaking to reduce occupational health risks and improve the wellbeing of staff.

In November **National Grid** reviewed their health strategy to provide a new approach that will help identify and address a range of new challenges for the next 5 years. Commitment to continue to invest in health and wellbeing was unanimously agreed by the Group Executive with a recommendation of a new enduring strategy to be presented back to the Executive in late spring 2012.

Five members of the **Scottish Power** Executive team sit on the Health and Safety Governance Committee. This committee leads on setting company wide health and safety objectives. This group ensures that there is consistency in the implementation and adherence to policies, standards and procedures across the company including occupational health risks. It also reviews health and safety performance. There has been a strong focus to ensure "health" is raised as part of "health & safety" discussions.

"The health and wellbeing of our people promotes employee engagement and reinforces our distinctive culture which emphasises safety, innovation and teamwork." Ian Marchant, Chief Executive, SSE (2011). The Management Board receive a quarterly update on the company's occupational health and wellbeing strategy and performance. Throughout the year the Safety Health and Environment Committee receive monthly updates on key performance indicators including sickness absence, OH referrals, new and progressive cases of HAVs, noise induced hearing loss and skin and respiratory sensitisation. The Health and Wellbeing strategy was reviewed in 2011 and a 5 year strategy developed with a continued commitment to invest in health and wellbeing to address key health risks including musculoskeletal disorders,

mental wellbeing and chronic ill health (cardio-vascular disease, diabetes, cancer, lifestyle choices).

Last year Northern Powergrid introduced Occupational Health into the company Safety Improvement Plan. A key set of objectives were introduced and all actions addressed at the close of the year. This assisted in the initiation of proposals for delivering occupational health and wellbeing proposals in 2012 – one of these was to change the name of the plan to Safety Health Improvement Plan fully supported by the Executive Board.

Last year there was continued strong leadership from the Chief Executive of EDF Energy and his Executive Team for the Occupational Health and Wellbeing Strategy, the vision being that all EDF Energy employees will have access to the information, resources and support they need to:

- > be mentally fit and resilient, especially during times of change
- > be physically fit, healthy and safe in the working environments and
- > feel connected, cared for and supported by others – a feeling of 'fitting in'

and to ensure that all managers are aware of the day-to-day skills, competencies and resources they can use to support wellbeing. Business Unit OH Stakeholder Groups were set up to regularly review performance which has helped to ensure that business needs are being met.

2. To identify the top three health risks and ensure they are being effectively addressed.

At the beginning of the year in E.ON an evaluation of attendance, occupational health referral, lifestyle assessment, physiotherapy and employee assistance programme data was reviewed in order to identify the current top three health risks within the organisation and specific business areas. These health risks were then divided between those most likely to cause absence (both short and long term) and those which were related to the working environment. The top three health issues in relation to long term absence cross organisation were mental health, musculoskeletal and cancers, with cardio-vascular ill health identified as being a key health risk based on the demographics of the organization. Having reviewed the demographic of the organisation and its level of risk, the cardiovascular campaign 'Keep the Beat' was developed and implemented cross business with recognisable positive results in both clinical data and client feedback.

UK Power Networks evaluated available inhouse data to identify their top three health risks as musculoskeletal, cardio-vascular disorders and mental health (stress). Also in UK Power Networks a number of issues picked up from incident reports and Occupational Health referrals reports resulted in several specialist ergonomic assessments being completed, which included use of roof ladders, replacement for one of the 4x4 vehicles, link box lifting tools etc.

The collation of OH new referrals and sickness absence data has enabled **WPD** to identify their top three risks as MSDs, mental health and cardio-vascular disorders. A number of initiatives have been introduced to tackle these risks including the Well Back programme.

Following a corporate hazards and impacts identification exercise identifying routine and non routine activities, health risks have been identified and the actions required to control these and reduce the risk have been incorporated into the **Electricity North West** health safety and environmental plan. Initiatives during the year included:

- improving the way the exposure to hand arm vibration is controlled
- reviewing the methods of training to prevent MSDs, including manual handling and working with display screen equipment training
- simplifying the processes in managing cases of work-related stress

In **RWEnpower** occupational health staff code the causes of all certificated spells of sickness absence and then collate the data to identify and track the major disease categories. Common mental health problems (CMHP) constitute the single biggest category by far. By adding the time lost for a proportion of short spells of absence and an allowance for presenteeism, the company has quantified the financial impact of CMHP on the business - it is extremely large. The in-house stress workshops for managers have been modified to cover mental health in general. Managers are trained to understand CMHP (including the impact their own behaviour can have) and how to recognise the early signs. They also learn how they should respond and where they can obtain help. In 2011 the RWEnpower OH team embarked on a study to evaluate the effects of a combination of management and employee education with the availability of cognitive behavioural therapy for those who would benefit from this form of treatment. The results are expected in mid 2012.

Eggborough Power Ltd identified respiratory, noise and musculoskeletal risks as the top 3 to be managed. Activities to address these risks included a *"love your lungs"* health promotion week in October and an *"ergoblitz"* health promotion month in February focussing on display screen equipment. The top three health risks in **SSE** were identified through a review of sickness absence data, company demographics, review of Government trends, employee assistance data and occupational health data (health surveillance, fitness for work assessments and occupational referrals) and were found to be musculoskeletal disorders, mental wellbeing, and chronic ill health (cardio-vascular disease, cancer, diabetes and dementia).

Potential challenges over the next 5 years for the company include influencing employee lifestyles and personal behaviour to minimise the risk of ill health and the impact on the individual, the organisation, and wider community, such as health choices, obesity, smoking, high blood pressure/cholesterol etc.

Scottish Power identified their top three risks: MSDs, mental health, sedentary lifestyle (obesity, poor diet & fitness) through a review of sickness absence data, company demographics, review of Government trends, employee assistance data, and occupational health data (health surveillance, fit for life assessments, fitness for work assessments and self referral appointments). A wellbeing framework is in place to support and deliver the Wellbeing Plan. The plan focused on obesity, diet and fitness. Fit for life assessments were offered by occupational health to enable early identification of lifestyle factors that may result in poor health in the long term and give pro-active advice and support regarding lifestyle changes. Health promotion activities were focused on MSDs, mental health, obesity, healthy eating and fitness. A review of facilities was completed to ensure that all employees have access to healthy choices including nutrition, exercise, smoking cessation, flexible working and other lifestyle options.

National Grid have identified that the major health challenges over the next 10 years will be improving the approach to mental wellbeing, engagement and performance, managing the implications of an ageing workforce and thirdly influencing employees' lifestyle choices to minimise the effects of obesity, diabetes and cardio-vascular problems on the individual and ultimately National Grid.

In **EDF Energy** the top two health risks managed in 2011 were common mental ill health problems and musculoskeletal disorders followed by chronic medical conditions particularly in terms of their impact on an ageing workforce. In 2011, 93 of the 532 referrals (17.5%) to the Employee Support Programme (ESP) were primarily work-related mental ill health cases. For the past 2 years the percentage of self referrals to the ESP has been 85% of the total. This has risen from 65% in 2007 and is a reflection of the various initiatives to raise awareness about stress related illness in the company.

A full review in **Northern Powergrid** of health absence statistics identified the top three health risks as musculoskeletal, mental health issues followed by operation/recuperation. A summarised prioritised list of areas to be covered by health screening has been established and findings are discussed monthly.

3. To ensure that health surveillance & fitness for work assessments are being delivered to national & legislative standards.

E.ON's health surveillance and fitness for work assessment process was revamped throughout 2011, in order to prepare for the Safe Effective Quality Occupational Health Service accreditation process (see **www.seqohs.org**). An external audit of health surveillance procedures has been arranged for the first quarter of 2012. A new travel health assessment procedure has been developed and introduced across the business in line with emerging travel health related risk and increase in travel abroad.

WPD's current health surveillance and fitness for work programme has been an ideal opportunity to endorse a holistic approach to ensuring a healthy workforce both physically and psychologically. Throughout 2011 **Northern Powergrid** reviewed their Employee Health Policy and launched a new version In January 2012, which includes specific reference to managers' responsibilities and actions to adhere to national and legislative requirements.

Last year **UK Power Networks**, building on work completed in 2010 when a health risk matrix was developed for all roles, developed a Job Task Analysis questionnaire to identify potential health (and safety) issues. This template and the matrix were used to observe job/tasks and to validate hazards and to confirm through monitoring the documented risk levels currently in place. It covers ergonomics, exposures to substances, noise, vibration, manual handling etc. Observations and monitoring is being completed supported by safety representatives. The current Fit for Work assessments were extended to none safety critical roles e.g. office based staff who undertake site visits involving safety critical activities.

In **Scottish Power** there is a robust system in place to identify individuals who are at high risk of exposure to occupational health hazards. A risk based health surveillance programme monitors employee health where exposure to hazards has been identified. Roles within the Company have been assessed by a team of occupational health hygienists to identify potential work-related health hazards. Occupational Health staff qualifications, competency and fitness to practice were reviewed annually as part of the OH Management System aligned with OHSAS 18001.

RWEnpower's OH team perform regular audits of their role (frequency of recall, employees seen on time, reporting to management using a statutory health record) and the clinical aspects (including the examination and conclusions). In 2012 the audits will consider the beginning and end of the health surveillance process i.e. whether the appropriate employees are put forward to OH, and whether the statutory health record is stored correctly and OH advice on future exposure followed. As a result the whole process will be audited and not just the OH aspects. Company protocols for the periodic health assessments of plant drivers, operational firemen, those employees who work at heights and in hot conditions are in line with industry best practice.

In **SSE** job roles have been assessed to identify potential work-related hazards and a health risk matrix developed to provide guidance for managers. A risk based health surveillance and health assessment programme is established to monitor employee health where exposure to hazards has been identified. This has been reviewed in 2011.

In **EDF Energy** the Chief Medical Officer carried out OH Oversight visits to 9 potentially high health hazard locations in 2011 to assess the understanding of managers, employees and contractors about the relevant occupational health risks and the link to the necessary health surveillance/fitness for work assessments carried out by the OH Teams. The CMO also audited the OH files of the employees interviewed during the visits.

4. To review approaches to the management of stress and identify opportunities for improvement.

The **E.ON** Head Way programme has continued to be rolled out throughout 2011, with updates completed to the mental health promotion webpages. E.ON has developed a stress risk assessment proforma and guidance for line managers in the completion of this, which has been piloted within field areas and is now in the process of being rolled out across the whole organisation. E.ON has offered fast-track funded psychological assessment and treatment services for those individuals with significant mental health issues following triage by the occupational health services.

WPD have developed a suite of fact sheets to help employees and line managers understand and manage mental health risks within their working and personal lives. In September **UK Power Networks** launched an online employee stress resilience selfassessment test which will be supported with daily safety messages focused at stress resilience techniques.

In **SSE** an online interactive 'Health and Wellbeing' portal provides an immediate source of information on emotional resilience with a range of issues from stress and anxiety to life stage events such as caring for others and relationships. An e-learning stress awareness resource is currently being developed.

In **Northern Powergrid** a lot of work was carried out in 2011 to initiate the findings from a company stress survey. Each business unit set up a focus group to discuss the findings and collate actions. Action plans have been produced and during 2012 these will be monitored before the survey is repeated. Managers have oversight of their business unit action plans.

National Grid ran a number of workshops covering work-related stress and the role of the line manager and building personal and team resilience. In addition, the top 60 directors took part in a workshop entitled mental resilience – taking the stress out of leadership as part of their annual off-site strategy event. The workshop was then cascaded down to senior and middle managers.

All **Electricity North West** employees attend bi-annual reviews with their leader, issues relating to pressure and stress are discussed using the guidance laid down in the management standards.

The aim of the Stress and Resilience Awareness Training Programme in EDF Energy has been to encourage managers to spot signs at an early stage that members of their teams may be developing stress related difficulties, and to help managers have the confidence to have a conversation with a team member about this, encouraging the person to do something about it rather than the condition worsening and leading into sickness absence. Nearly 2000 managers and supervisors were trained in Stress and Resilience Awareness by the end of 2011.

In 2011 the Building Resilience Through Change training programme was developed and run as workshops for groups of managers involved in some of the major change initiatives in the company. 513 managers attended the programme during 2011. The main aims of this training programme are to understand the links between change, and have been to reinforce participants' resilience platforms and to look at how managers can take their teams through a change experience more equipped to build into their day-to-day management practice behaviours which reinforce the resilience of their teams.

Participants have access to the online Resilience Index (RI) together with the Resilience Enhancement Programme, which in 2011 was made available to all staff on the 'Less Stress' Microsite of the Zero Harm Intranet site – the 'one stop shop' for all of EDF Energy's health and wellbeing tools – and is a self-help tool designed to increase employees' psychological resilience and ability to cope with difficult and potentially stressful life events.

RWEnpower views training as important to ensure that managers understand the concepts of pressure and stress and know what they can do to limit the latter. Their OH team has developed a Stress Workshop for managers which they also deliver as well as producing a leaflet on stress for employees. RWEnpower has also reviewed their in-house stress risk assessment tool and made improvements to the administration and technical aspects so it is easier for the manager to use. The report he/she receives has been modified so it includes suggested interventions. The content of the workshop has been improved to take a broader approach to workplace mental wellbeing. The company is considering introducing an additional tool which will measure managerial competency in preventing stress and will trial its use in two areas of their customer facing business. An online educational programme is

to be developed for all employees in order to improve their understanding of mental wellbeing. This will be piloted in two parts of the business in preparation for a more general roll-out.

Scottish Power piloted a Cognitive Behavioural Therapy (CBT) tool to provide fast access to treatment and advice for mental health difficulties. A new EAP online allowed employees to access virtual coaching and to take responsibility for their own mental wellbeing. The short term absence pilot ensured that employees were contacted on their first day of their absence ensuring that stress cases were identified early and a prompt referral made to counselling and support. All senior Occupational Health nursing staff were also given training in CBT to help build "emotional resilience" amongst the workforce.

5. To develop policies for the rehabilitation of individuals back into the workplace and consider a fast-track physiotherapy approach to the management of MSDs

In 2011 **National Grid** extended the Soft Tissue Injury Prevention programme to cover all 4500 operational workers. Through their health surveillance programme National Grid identified 15 new or progressive cases of Hand Arm Vibration Syndrome. This has led us to a comprehensive review of the approach to managing employees who use vibrating equipment.

NIE has an active policy to work with employees at an early stage of any absenteeism to provide appropriate facilities via company OH consultants.

In **Northern Powergrid** the rehabilitation process has been updated and communicated to managers who have also been briefed on the benefits of early intervention and management oversight if they wish to improve performance and productivity – in 2011 there was a reduction in absence of 2.82%.

E.ON funded fast-track physiotherapy has been offered cross their organisation for those experiencing musculoskeletal disorders. The company has reviewed their supplier of office furniture, taking account of the ergonomic design of the furniture and the assessed risk within the working environment. The E.ON Attendance Management toolkit was reviewed to make it more user friendly in a joint project between Human Resources, line management and Occupational Health Services.

UK Power Networks piloted, with H&S advisers and safety representatives, musculoskeletal awareness sessions. The sessions are interactive offering practical advice on manual handling and what to do if you have an injury. Sessions are now starting at office and call centres following a review of the result of in-house "physio discomfort surveys", which identified static posture as a key risk factor.

RWEnpower is expanding sickness absence guidelines for managers so that they include information on vocational rehabilitation. It is intended to introduce a new sickness absence and vocational rehabilitation policy and provide advice to employees on the benefits of an early return to work through information on the OH intranet site.

WPD has a managed back care programme, which is a fast-track physiotherapy programme triaged by the OH department. The programme is also available to individuals suffering other musculoskeletal disorders.

All employees of **EDF Energy** have access to fast-track physiotherapy either on-site or through external physiotherapy services affiliated with OH, the latter being responsible for managing the reporting/metrics relating to each case.

At **Scottish Power** a fast-track physiotherapy approach was implemented in January 2011 to ensure that employees are seen appropriately and quickly and consequently speed up recovery and return to work or prevent absence. The new referral process involves an initial triage by the Occupational Health nurse either by telephone or face to face with the employee to ensure that physiotherapy is appropriate and also to determine the urgency of the referral. An assessment is stored electronically which the physiotherapist can review at the initial appointment. All treatments should last a maximum of 4 sessions. During the treatment all updates and clinical assessments are stored using a standard template to enhance the partnership approach ensuring good communication between the Occupational Health nurse and physiotherapist. Provision of in-house physiotherapy enabled early referral and treatment in the context of the workplace with employee retention in work and recommendations for temporary work modifications to promote rehabilitation.

6.To raise awareness of the importance of workforce involvement, specifically health & safety representatives and other workers' representatives, in the management of Occupational Health and support them in carrying out health related activities to support the delivery plan throughout the year.

In **WPD** the OH Department worked closely with the safety team to deliver a "time out for safety" road show throughout November visiting all WPD sites. At these events the OH team promoted current initiatives relating to the company's top 3 health risks.

In **E.ON** employee representatives were trained and provided with tools to allow them to undertake assessment and promotion activities in the workplace. For example they were provided with body mapping tools and trained in their use as a participatory activity. Safety & Health Representatives were engaged and involved in the development of the Keep the Beat Campaign for 2011.

Safety representatives are members of the **National Grid** Mental Wellbeing Development Group that provides support to management. In addition, the annual company safety representatives conference focused on Powering Improvement and health where National Grid gave a commitment to develop the role of safety representatives to cover more fully health and wellbeing issues.

The Occupational health/hygiene plan in **Scottish Power** set a target to develop and

deliver Occupational Health and Occupational Hygiene awareness for H&S advisers and H&S representatives to broaden knowledge base by the end of 2011. This was achieved by:

1. Site visits - 12 completed by Occupational Health practitioners to enhance employee understanding of the OH role, health issues and service

2. A bi-annual forum between Occupational Health and Hygiene and H&S advisers across the business to share knowledge and information across the function

3. The Annual Health and Safety Conference was held north and south and attended by over 200 health and safety representatives. The conference provided feedback on company performance and workshop sessions

The **Scottish Power** Wellbeing Steering Group led and co-ordinated wellbeing activities through a network of wellbeing coordinators based at local sites. Employees were involved in planning and delivering health and wellbeing initiatives. This has enhanced employee engagement and ensured two-way feedback.

UK Power Networks presented proposals for the revitalisation of occupational health at their in-house safety representatives conference in April. Safety representatives and full time officials were involved in the development of the Occupational Health and Wellbeing Strategy and changes to the management and self referral forms. Involving safety representatives with specific job skills in the job task analysis sessions as part of the Fit for Work and Health Surveillance validation sessions has proved beneficial. UK Power Networks ran a month long campaign to raise awareness of occupational health and wellbeing issues, which included the issue of over 4,200 copies of the Hayes Mini Man manual to promote Men's Health Week, an increase in the number of staff seen for fit for work assessments and the company signing up to the Public Health Responsibility Deal - all of which are the building blocks for our 2012 wellbeing campaign

Electricity North West have reviewed consultation arrangements and encouraged more people to become safety representatives due to a reduction in safety representatives following the formation of the company. Methods of communication have been revised including the redesign of health and safety notice boards and safety bulletins for staff who do not have access to internal IT systems.

In 2011 **Northern Powergrid** developed a Health & Safety Representatives' Charter fully supported by the four recognised trade unions. Powering Improvement has been added as a standing agenda item to the safety representatives' meetings that are held quarterly.

Within **RWEnpower** the OH staff liaise with Health & Safety representatives at a local level both informally and formally through site H&S committees. The company is exploring opportunities with the trade unions to introduce in-house training in company specific Occupational Health issues for Health & Safety representatives. This will supplement the external training they currently receive.

In SSE the Safety Family – It's The Way We Do Things is a behavioural safety programme which was launched in 2011 at the Safety conferences in the north and south. The key message is that everyone in the company has a personal responsibility towards health and safety to reduce injuries at work and occupational ill health. The programme continues to be rolled out across the business with every employee being introduced to the programme by October 2012. The SHE conferences in 2012 will focus on improving health and wellbeing at work. The conferences and health exhibitions will provide over 1,100 employees with ideas on how to stay fit and healthy, return to work quickly following absence and stay in work. The Health and Wellbeing Action Plan focuses on wellbeing activities, which are co-ordinated through a network of Local Safety/ Wellness Groups and safety representatives, and road shows.

The restructuring of **NIE** following its purchase by ESB necessitated a review of the overall H&S committee structure throughout the company. The new structure and new members of committees, together with supporting the Powering Improvement commitments, will enhance NIE's OH performance.

EDF Energy recently launched its Safety Representatives Charter embracing the two previous legacy companies, which is a clear demonstration of the close working relationship with our trade union partners. The Charter will further raise awareness across EDF Energy of the value of engagement with our safety representatives on occupational health and wellbeing as well as on safety matters.

In addition:

Also in 2011 ENA's Occupational Health Committee has developed guidance and supporting material to help companies deliver the six commitments (in the Delivery Plan) and make them a reality. These are available on the new Powering Improvement website. Furthermore:

- > a Health Needs Assessment Tool has now been launched to help companies understand and assess their health and wellbeing needs
- > a Health and Wellbeing Framework has been developed to assist companies in the management of these issues and
- > a suite of good practice Occupational Health case studies have been reviewed and updated

A dedicated Powering Improvement website which includes associated supporting material for the initiative is now live (www.poweringimprovement.org). It includes the 2010 Progress Report.

A summary leaflet highlighting the 6 commitments was produced and is available on the Powering Improvement website.

A Powering Improvement Communication Strategy was developed. A copy is attached at Appendix 2 for information.

Peter McCormick, in his role as Powering Improvement Coordinator, presented to the ENA Board on 10 October. The Board supported the proposal to establish a "Network of Advocates" to ensure that the Powering Improvement messages are communicated to all levels in ENA companies.

MEASURING PROGRESS

Leading indicators

When Powering Improvement was launched it was agreed that progress should be measured by a mixture of lagging and leading indicators. Throughout 2011 the Powering Improvement Steering Group (see Appendix 3 for more information) has discussed what type of leading indicators would best support the Powering Improvement strategy. It was agreed that the following indicators would be adopted throughout 2012 and reported in next year's Annual Report.

Activity

- Level of penetration of Powering Improvement into the industry (% of the target organisations engaged either through attendance at an event, or through a positive written acknowledgement of support for the activities)
- Percentage of target organisations who report to have taken activity based on the strategy
- Number of hits on the Powering Improvement website
- > Powering Improvement events log
- Number of new case studies uploaded to the Powering Improvement website

Awareness

- Coverage of specific issues raised through the theme in industry and in-house publications
- Results of an annual industry Powering Improvement awareness survey

 Number of company tool box talks on Powering Improvement (or delivery plan issues) delivered

Impact

- Self report from each participating organisation of the strategy's impact – extent of influence and perceptions of change
- Percentage of organisations who have done something that they otherwise would not have done in response to the strategy
- > OH referrals and numbers of new OH cases

An indication of such work carried out in 2011 can be found in the Powering Improvement Events Log which can be viewed on the Powering Improvement website.

Lagging indicators

ENA member companies have given a commitment to continue to collate the data that was collated for the previous industry Health & Safety initiative, SAFELEC 2010, in order to monitor the sector's performance during Powering Improvement. These figures will regularly be made available on the Powering Improvement website and will be monitored by the Powering Improvement Steering Group. AEP member companies will also monitor their performance.

LOOKING FORWARD TO 2012

The theme for 2012 is Asset Management and Maintenance. Letters were sent from Robert Davis, Group CEO EA Technology, who is Champion for the year, to senior management in AEP and ENA companies and the General Secretaries of GMB, Prospect, Unison and Unite outlining the activities planned. A number of positive responses have already been received in support. A copy of the Delivery Plan can be seen at Appendix 4.

ROBERT DAVIS Group CEO EA Technology



As an Honorary Fellow and ex-President of the Institute of Asset Management (IAM) I was delighted to accept the invitation to be champion for this third year of the Powering Improvement strategy when the theme is asset management and maintenance. My organisation EA Technology's activities focus on asset management and innovation and as Group CEO I am keenly aware of the importance to companies in the electricity sector, both networks companies and generators, of successfully managing physical assets and associated performance.

You will see from the Delivery Plan later in this report that the intention is to work with other stakeholders, including the IAM, to develop competency guidelines for those involved in or responsible for asset management in the electricity sector be they manager, supervisor or operational staff. In addition, case studies will be produced highlighting best practice and sharing lessons learned from both inside and outside the electricity sector. I fully support this focus on the "softer "aspects of asset management because all companies in the sector already have detailed systems and procedures in place (most of which are accredited to the asset management standard PAS 55) and it is important not to repeat what is already out there.

I look forward to working closely throughout the coming year with the Powering Improvement Steering Group and its sub-group of asset management experts to ensure that all the outputs in support of this year's asset management theme are delivered to a high standard that companies will find relevant and useful to their own operations.

The good work on this topic will not simply end on 31 December 2012 but rather will continue throughout the remainder of the Powering Improvement Strategy and beyond.

I am confident that 2012 will be another successful year and I look forward to playing my part as champion.

APPENDIX 1

Details of ENA Companies formally supporting Powering Improvement

Northern Powergrid

UK Power Networks

Electricity North West Ltd

Inexus

Manx Electricity

National Grid

Northern Ireland Electricity

SSE

Scottish Power

Western Power Distribution

Details of AEP Companies formally supporting Powering Improvement

Centrica

E.ON

Magnox

EDF

Scottish Power

Welsh Power

Doosan Power

RWE

Manx Electricity

Drax Power

Eggborough Power

Note: This report covers the period from 1 January to 31 December 2011. From 2 April 2012 the generation companies are represented by the trade body Energy UK.

Trade Unions: Prospect, Unite, Unison, GMB

APPENDIX 2 COMMUNICATION STRATEGY

Our Vision > To be a world leader in health & safety by 2015

Our Goal > This message will be effectively communicated across our industry

OBJECTIVES

- 1. Communicate to the workforce, Government, politicians and wider public the Powering Improvement vision and values
- 2. Identify and engage key partners, advocates and stakeholders
- 3. Clearly define a brand for Powering Improvement
- 4. Establish and maintain a press awareness of the strategy
- 5. Align with other ENA and industry key messages

Purpose > An effective communications strategy must

- Raise the profile of Powering Improvement to all stakeholders and the wider public
- Ensure management and workers across the industry are aware of the strategy through the unions and company structures
- Create an environment that will bring about a reduction in incidents
 through the success of Powering Improvement
- · Identify clear ways of measuring our achievements and communicate them
- · Communicate through a website that is read by all key stakeholders
- · Engage our key advocates in a partnership approach including politicians and Ministers

Our 2012 Communication Plan Targets and time line

- Organise a workshop for the network of advocates (Target date Summer)
- Brief the Chair and members of the Work and Pensions Select Committee (Target date - by May)
- Address the All-Party Parliamentary Health & Safety Group (Target date - late Summer/Autumn)
- Place articles on the new tools and other early achievements (Ongoing)
- Press releases coordinated with companies and unions to highlight case studies (Ongoing)
- Secure speaking opportunities at conferences (Ongoing)
- Coordinated content with Institute of Asset Management (Ongoing)

OUR VALUES

All workers on our sector have the right to go to work each day and not be injured or made ill by their work We are committed to sharing best practice on health and safety risks including sharing lessons learned when things go wrong

Management will work closely with workers' representatives to ensure that all health and safety risks are adequately addressed Everyone in our industry has a responsibility to look after their own – and their colleagues' – health and safety We are fully committed to addressing occupational health issues as well as safety ones

By sharing best practice our industry can benefit from a wealth of knowledge and experience

KEY MESSAGES

Delivering our Vision - All Powering Improvement partners aspire to the vision that the UK electricity industry will be a world leader in health and safety performance by 2015

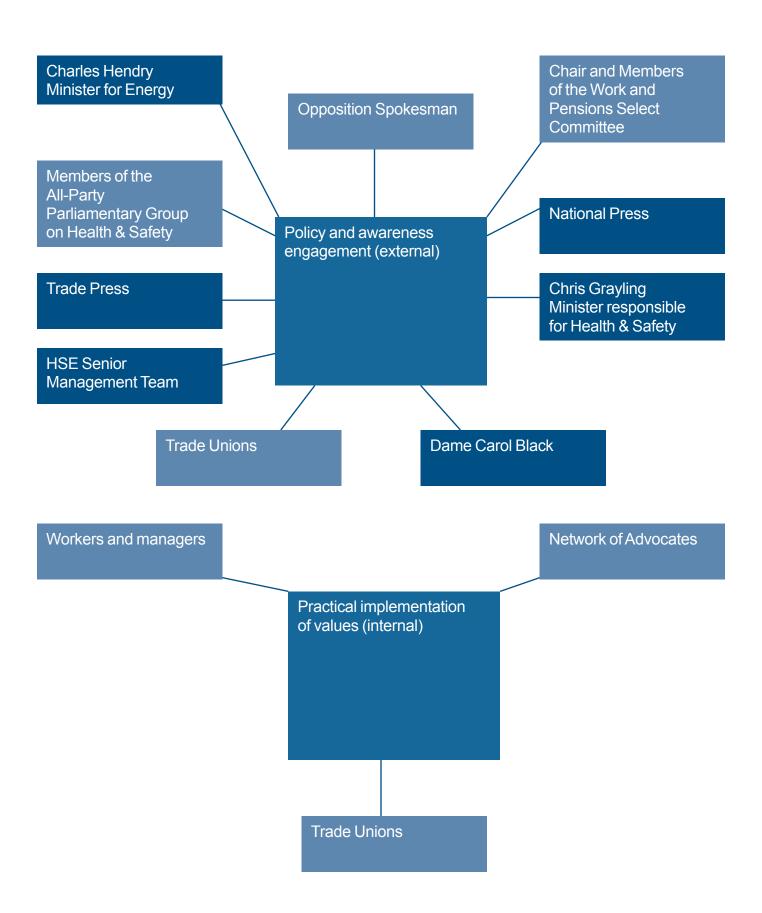
By our actions we will ensure that all workers in the industry are aware of and agree with this overarching vision

Managers and workers working together is our central tool in achieving our values and delivering our vision We are fully committed to addressing and highlighting occupational health issues as well as safety ones

Communications within the companies and across the industry is vital to delivering success The fundamental principal enshrined in Powering Improvement is to advance a partnership approach and share best practice as far and wide as possible (including outside our sector)

Everyone is part of this process and has a responsibility to deliver it and look after their own and colleague's health and safety

STAKEHOLDER MAPS



DELIVERY PLAN				
ACTION / DETAILS	AUDIENCE	TIMINGS	RESPONSIBILITY	OUTPUTS
EXTERNAL				
Round table discussion with industry and unions	Politicians and trade media		ENA to lead ALL for input	Maintain political awareness for 2012 theme and trade media article
Speaking opportunities	Industry and H&S practitioners	Ongoing	ALL	Raising profile of PI to industry and wider practitioners
Trade press articles	Industry, H&S practitioners and trade press itself	May/June 2012	ENA-TF	Articles for Safety & Health Practitioner, Health & Safety at Work, RoSPA and BSC magazines initially on the launch of the Network of Advocates. Increased awareness amongst the trade/H&S press
All-Party Parliamentary Group on Health & Safety	MPs and wider policy stakeholders		ENA-TG	Presentation to the MPs of the group to promote the principles and successes of PI
INTERNAL				
Powering Improvement logo and links on all company and union websites and Intranets	All levels of operational staff and management. Wider industry stakeholders. Union representatives	End of April 2012	ALL ENA – to provide suggested wording	Increased awareness within companies to assist profile raising of Network of Advocates
Newsletter articles for launch of Network of Advocates	Supervisor and operational staff subject to newsletter distribution	Advance of official Network of Advocates launch	ENA & AEP - member company internal comms colleagues Union representatives	Ongoing progress of each company shared with all levels of their own staff
Workshops	Management relevant to key areas. Union representatives	Ongoing	ALL	Focused interaction with key staff responsible for topic of workshop within member companies
Regular PI updates at staff and union meetings	Supervisor and operational staff	Ongoing	Member companies and union representatives ALL through the initial provision of information	Direct interaction with operational staff that are considered by PISG as difficult to reach. Long term ongoing feedback of progress and success

DELIVERY PLAN (continued)				
ACTION / DETAILS	AUDIENCE	TIMINGS	RESPONSIBILITY	OUTPUTS
INTERNAL				
Operational staff flyer	Operational staff and contractors	June	ENA to provide artwork. Member companies to print and distribute	Small postcard sized leaflet that sets out purpose of Pl/longevity and delivery themes/ progress. Format suitable to be taken away from staff meetings and given to all contractors at induction
Quarterly case study updates and distribution of Annual Reports	All staff		ENA to produce. Member companies to provide content and assist with distribution. Annual Report summary leaflet/pdf with links to online content	A 2-sided A4 PDF document that can be emailed to Advocates, senior H&S Managers and internal comms for distribution to staff by email or print where necessary. Produce similar for Annual Report summary that can easily be distributed
LinkedIn group and discussion	H&S Managers and Practitioners	May – for inclusion in leaflets	ENA to set up. ALL to publicise and engage in. Member companies to promote	A suitable social media presence for PI. Will allow sharing of information and best practice as well as an opportunity to discuss particular elements of PI
Survey Monkey assessment	All staff	In advance of Network of Advocates launch	ENA to set up. ALL to provide content. Member companies to promote	A quantifiable assessment of the level of engagement with PI within companies. Will aid dissemination and show value of the network of advocates

APPENDIX 3

Powering Improvement Steering Group for 2011

Members:	
Peter McCormick	ENA (Chair)
Nick Summers	HSE
Neil Budworth	E.ON
John Ayre	EDF Energy
Sarah Page	Prospect
Stephen O'Neill	AEP
Peter Coyle	ENA
Richard Le Gros	ENA
Mike Leppard	ENA

Meetings held on: 16 August, 26 October, 12 December

Teleconferences held on: 14 January, 17 February, 24 March, 4 May, 21 June, 10 September, 22 November

APPENDIX 4

Delivery Plan 2012 - Asset Management and Maintenance

Vision

The UK Electricity Industry will be a world leader in health and safety performance by 2015.

Strategy

ENA and AEP member companies and trade unions commit, with the support of HSE, to build on our partnership approach to bring about continuous improvements in the management of safety and occupational health in the electricity sector in the 5 years leading up to 2015. We will do this by supporting the priorities in the HSE strategy, in particular the themes of leadership, worker involvement and improving competence, and by proactively managing the risks that cause real harm and suffering.

In line with HSE's strategy, The Health & Safety of Great Britain: Be Part of the Solution, three over-arching themes will run throughout the lifespan of Powering Improvement: leadership, improving competence and worker involvement.

To maintain momentum each year the strategy will focus on a specific topic which has been identified as a priority area for our sector. Each topic will be led by a senior industry champion.

- 2010 Leadership (Champions David Porter CE AEP and David Smith, CE ENA)
- > 2011 Occupational health/wellbeing (Champion Jane Willis, HSE Director of Cross-Cutting Interventions)
- > 2012 Asset management/maintenance, (Champion Robert Davis, Group CEO EATL)
- 2013 Behavioural safety/personal responsibility
- > 2014 Beyond 2015 Next steps

The topic for 2012 is asset management & maintenance and will be championed by Robert

Davis, Group CEO for EA Technology Ltd. All ENA and AEP companies have detailed systems and procedures in place to manage their assets, many of which are accredited to BSI PAS 55. This is the Publically Available Specification published by the British Standards Institute which provides for the integration of all aspects of the asset life cycle: design, acquisition, construction, commissioning, operation, maintenance, renewal, modification and disposal. The intention therefore for 2012 is to focus on the "softer" aspects of asset management and to produce sector-specific high level guidance linked to the over-arching Powering Improvement themes i.e. leadership, competence and worker involvement. This will include a competency framework for asset management and maintenance within the electricity sector, collating AEP and ENA case studies highlighting best practice and developing high level guidance demonstrating the link between asset management and health and safety.

Much of the work to produce the outputs detailed in the Delivery Plan will be carried out by an expert sub-group. ENA and AEP companies will consider how best to utilise the outputs within their own asset management systems. For Transmission Operators the outputs will help inform their reporting to Ofgem under the RIIO (Revenue = incentives + innovation + outputs) Framework. Asset Management and Reliability is a secondary deliverable under safety outputs in the Framework.

Definitions

Asset management:

Systematic and organised practices through which an organisation optimally manages its physical assets and their associated performance, risks and expenditures over their life cycles for the purpose of achieving its organisational strategic plan. (BSI PAS 55).

Maintenance:

Planned/preventive maintenance – planned actions, including inspections, at specific intervals to keep physical assets in safe working order.

Corrective maintenance – maintenance required when an asset has failed or worn out in order to bring it back into working order.

Deliverables

Output 1

The National HESAC Powering Improvement Asset Management sub-group will develop, in partnership with other stakeholders (e.g. IAM and IET) as appropriate, industry competency guidelines for managers, supervisors and operational staff involved in and/or responsible for asset management.

- Consider supporting production of a Part 3 of BSI PAS 55 on Human Asset Management

Output 2

The National HESAC Powering Improvement Asset Management sub-group will develop high-level guidance for the electricity sector highlighting the link between asset management, process safety and the successful management of health and safety risks, to both workers and members of the public.

Output 3

The National HESAC Powering Improvement Asset Management sub-group will gather learning from within and outside our sector and produce a suite of case studies highlighting best practice in managing the health and safety risks from asset management and maintenance activities - including lessons learned from both managing equipment failures and failures to manage equipment.

> A series of workshops will be arranged throughout the year.

Output 4

The National HESAC Powering Improvement Asset Management sub-group will engage with managers, supervisors and operational staff and their representatives to highlight asset management and maintenance issues throughout the year.

- > Focussing on the "why" as well as the "how"
- Tool box talks on specific asset management topics

Timeline

January 2012 - Finalise plan and publish;

January 2012 onwards - promote/highlight delivery plan within ENA and AEP companies and other stakeholders;

March 2012 – workshop;

May 2012 - SHE Management Conference;

October 2012 – workshop;

November 2012 - IAM Conference;

Throughout 2012 – completion of competency framework, guidance and development of case studies.

OUTPUT 1 WORKPLAN			
SERIAL	ACTION	COMPLETE BY	
1	Collect known existent competency profiles (IAM, IET, EU Skills, HSE, etc)	29 February 2012	
2	Benchmark best practice in application of competency profiles – look for exemplars outside sector	31 March 2012	
3	Describe/define guidelines (what/who/how/why). Produce draft guidance	30 June 2012	
4	Receive and incorporate comments on guidelines form stakeholders	31 August 2012	
5	Seek sign onto guidelines by relevant committees (HESAC, SHEC, AEP H & S Forum, etc)	Based on committee autumn 2012 meeting dates	
6	Publish and communicate final version of guidelines	30 September 2012	
7	Consideration and promotion of proposal to develop part 3 of BSI PAS 55	Throughout 2012	

OUTPUT 2 WORKPLAN			
SERIAL	ACTION	COMPLETE BY	
1	Hold SHE Managers' workshop	31 January 2012	
2	Produce supporting material for workshop and Network of Advocates	Friday 9 March 2012	
3	Hold workshop	31 March 2012	
4	Redraft material based on workshop discussions	31 August 2012	
5	Circulate to relevant committees for comment	30 September 2012	
6	Publish and communicate final version of guidelines	31 October 2012	

OUTPUT 3 WORKPLAN			
SERIAL	ACTION	COMPLETE BY	
1	Collate, sort, publish (in collaboration with Stepchange) examples of good (and perhaps poor) practice in asset management	Throughout 2012	
2	Produce and publish first case study	29 February 2012	
3	Produce and publish second case study	30 April 2012	
4	Produce and publish third case study	30 June 2012	
5	Produce and publish fourth case study	31 August 2012	
6	Produce and publish fifth case study	31 October 2012	
7	Produce and publish sixth (and final) case study	31 December 2012	

OUTPUT 4 WORKPLAN			
SERIAL	ACTION	COMPLETE BY	
1	Peter McCormick and Subgroup to represent aims and objectives of this group and PI at key Select Committees etc	Throughout 2012	
2	Use 'roadshow' workshops to engage with workers and deliver 2012 PI messages	Throughout 2012	
3	Arrange and hold Power Industry 'closed door' workshop to enable open and honest discussion on asset related incidents	Late 2012	



PARTNERS

Energy Networks Association (ENA) is the industry body for the UK electricity transmission and distribution companies.

Association of Electricity Producers (AEP) is the trade association for the UK electricity generation companies.

TRADE UNIONS:

GMB Prospect Unison Unite

GOVERNANCE

Powering Improvement is managed and directed by National Health and Safety Advisory Committee (HESAC) comprising representatives from AEP and ENA member companies, the industry trade unions (GMB, Prospect, Unison and Unite) and HSE.

Executive decisions on behalf of ENA member companies rest with the ENA SHE Committee and ultimately the ENA Board.

Executive decisions on behalf of AEP companies rest with the AEP Health and Safety Forum and ultimately the AEP Board.



