Health & Safety Management System

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10.3 CONTINUAL IMPROVEMENT

APPENDICES

A.1 MANAGEMENT SYSTEM PROCESS INTERACTION

A.2 ORGANIZATION CHART
4 Context of Our Organization

4.1 Organizational Context

Your organization is committed to defining our position in the marketplace and understanding how relevant factors arising from legal, political, economic, social and technological issues influence our strategic direction and our organizational context.

Your organization identifies, analyzes, monitors and reviews factors that may affect our ability to satisfy our customers and stakeholders, as well as factors that may adversely affect the stability of our processes and the integrity of the management system.

To ensure that our health and safety management system is aligned with our strategy, whilst taking account of relevant internal and external factors; we initially collate and analyze pertinent information in order to determine the potential impact on our context and subsequent business strategy.

Such issues include factors that are affected by our organization or are capable of affecting our organization. Broadly, these issues are defined as:

1. Internal issues – conditions related to our organizational activities, products, services, strategic direction, culture, people, knowledge, processes, and systems. Using SWOT analysis provides our organization with a framework for reviewing and evaluating our strategies, and the position and direction of our organization, business propositions, and other ideas;

2. External issues – conditions related to cultural, social, political, legal, regulatory, financial, technological, economic, competition at local, national or international levels. Using PESTLE analysis provides our organization with a framework for measuring our market and growth potential.

Your organization then monitors and reviews this information to ensure that a continual understanding of each group’s requirements is derived and maintained. To facilitate the understanding of our context, we regularly consider issues that influence our context during management review meetings using the Context & Interested Parties analysis template.

The results of which are conveyed via minutes and business planning documents. We maintain and retain; in addition to this document, the following documented information to describe our organizational context and decisions relating to it:
5 Leadership & Worker Participation

5.1 Leadership & Commitment

Top management is proactively involved in implementing and maintaining our organization’s health and safety management system. Effective safety management supports our efforts to drive towards an increasingly positive safety culture by increasing the visibility of Top management’s support and improving active involvement of personnel in managing safety risk.

Effective safety management empowers a positive safety culture and a positive safety culture empowers effective safety management.

Our organization’s positive safety culture is visibly supported by upper and middle management, to encourage front-line personnel to feel a sense of shared responsibilities towards achieving our safety objectives.

Top management provides accountability and governance to all activities related to the lifecycle of our processes and products. This includes defining the appropriate responsibilities, authorities, and methods of communication to ensure the safe and effective performance.

Top management ensures that all necessary resources, responsibilities, and accountabilities are allocated for the continual improvement of the health and safety management system. Refer to Appendix A.2 for a copy of our current Organization Chart.

Top management has appointed the Health & Safety Manager to ensure that the necessary financial, technological and organizational resources, including the services of specialists and competent Health & Safety Advisors, are available to implement monitor, maintain, and report upon the status of the health and safety management system.

Cross-functional committees that comprise various organizational levels, functions and work areas are established to support active occupational health and safety management. The Cross-functional committees oversee the implementation of improvement plans and the development of safety objectives. The Cross-functional committees report to Top management and the Health & Safety Manager.

Regular reviews and data reporting ensure that our health and safety management system is effective and has the ability to react to emerging issues. Top management is committed to implementing and developing the management system and this commitment is defined by our corporate policies and objectives. Top management’s involvement and commitment may be found in:
6 Planning
6.1 Actions to Address Risks & Opportunities

6.1.1 General

Top management is responsible for incorporating risk-based thinking into our organization’s culture. This includes the establishment of risk management procedures and processes to ensure the effective risk and opportunity management principles are undertaken throughout the lifecycle of our operations, processes, health and safety management system, products, services, and activities by:

1. Providing sufficient resources to carry out risk and opportunity management activities;
2. Assigning responsibilities and authorities for risk and opportunity management activities;
3. Reviewing information and results from audits and risk and opportunity management activities.

Your organization considers the risks and opportunities arising business planning (4.1), workers and interested parties (4.2), our management system and its processes (4.3), our operations and supply chain (8.1) and takes action to ensure that our health and safety management system meets its intended outcomes, reduces undesired effects and achieves continual improvement.

Once the significant hazards (6.1.2.1), safety risks and other management system risks (6.1.2.2), safety opportunities and other SMS opportunities (6.1.2.3), legal and other requirements (6.1.3) are identified, our organization then plans actions to avoid or mitigate the perceived risks, or to take advantage of opportunities that improve safety.

Your organization uses the Risk & Opportunity Register to identify and evaluate risks associated with our health and safety management system, and specifically, changes in the organizational context, strategy, and legal requirements that relate to the needs and expectations of our workers and other interested parties.

Action is taken in a variety of ways using management review meetings safety committee meetings, design review meetings, setting objectives, reviewing SPIs and policies, improving operational control, emergency preparedness planning, supplier evaluation, and other appropriate processes.

Supporting documentation:

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6.1.2 Hazard Identification & Assessment of Risks & Opportunities

6.1.2.1 Hazard Identification

Your organization recognizes that occupational ill-health risks can exist at all levels within our business. In order to proactively identify hazards before they lead to accidents, incidents or other safety-related occurrences, your organization has adopted two methodologies for identifying hazards, one reactive and one proactive.

1. The reactive methodology involves analysis of past outcomes or events. Hazards are identified through an investigation of safety occurrences. Incidents and accidents are an indication of system deficiencies and therefore used to determine which hazard(s) contributed to the event. Hazards are also identified through safety data analysis to identify adverse trends and make predictions about emerging hazards, etc. This information is retained in the Hazard Identification Register.

2. The proactive methodology involves collecting safety data of lower consequence events or process performance and analyzing the safety information or frequency of occurrence to determine if a
7 Support

7.1 Resources

Top management is responsible for planning, providing and maintaining the infrastructure and resources needed to achieve product and process conformance, including buildings, workspace and associated utilities; process equipment (hardware and software); and supporting services (such as internal transportation, material handling systems, and communications systems).

The resource requirements for the implementation, management, control and continual improvement of our health and safety management system, are defined in our operational procedures, work instructions and the following sections of this management system manual:

1. Planning; Section 6.0
2. Management review; Section 9.3
3. Human resources; Section 7.1.2
4. Infrastructure; Section 7.1.3
5. Work environment; Section 7.1.4
6. Planning operational control; Section 8.1
7. Determination of emergency response; Section 8.2

The Facilities Manager, supported by the Health & Safety Manager, has overall responsibility for managing the related occupational health and safety hazards present at our facilities, and those which exist intrinsically within our equipment, methods, processes, or maintenance programmes, including:

1. Transportation, storage and material handling;
2. Equipment management, maintenance, and repair;
3. Process and production equipment management, maintenance and repair;
4. Facilities management, maintenance, and repair.

All maintenance is performed as per the original equipment manufacturers recommendations and is recorded on the Equipment Maintenance & Service Log for each piece of equipment. The accuracy and performance of the equipment are continuously monitored and special attention is given to items of key safety equipment that require statutory inspections.

7.2 Competence

Top management identifies emerging competency needs during management reviews. Emergent competency needs are converted into job descriptions for the type and number of positions that need to be filled through internal or external recruitment. To ensure the competence of our workers and contractors, job descriptions have been prepared and identify the qualifications, experience, interactions, and responsibilities that are required for each position.

Qualifications are reviewed upon hire when an employee changes positions or the requirements for a position change. Qualifications include desired requirements for education, skills, and experience. Appropriate qualifications, along with the provision of any required training, provide the competence for each position. The Human Resources Department review employee qualifications prior to hiring when an employee changes positions or the requirements for a position change.
8 Operation

8.1 Operational Planning & Control

8.1.1 General

*Your organization* has established and implemented a system to identify and assess occupational ill-health risks, refer to 6.1.2, and to implement the appropriate controls to mitigate the resulting risks. Occupational health and safety procedures are implemented by all teams and departments using the appropriate supporting documentation and competent workers, and safe routines.

*Your organization* ensures that all operational activities, including product and service outputs, meet the applicable safety requirements and regulatory standards. As required by regulations, aspects of product safety are controlled to mitigate risk to workers and end-users during the product life-cycle as appropriate, including:

1. Assessment of hazards and management of associated risks (see 6.1.2);
2. Management of safety critical items;
3. Analysis and reporting of occurred events affecting product safety;
4. Communication of these events and training of affected workers and contractors.

The operation and maintenance of plant and equipment that have the potential to impact safety performance, as defined through risk analysis, is maintained, inspected and tested to ensure it meets design descriptions and specifications. Documentation for critical processes, plant, and equipment is retained and made available, and includes as applicable:

1. Codes and relevant legislation;
2. Hazard assessment reports;
3. Operating procedures and operating criteria;
4. Engineering drawings, specifications, and engineering standards;
5. Maintenance, inspection and testing strategies;
6. The characteristics of the product or materials essential for safe and proper use.

The Provision of Work Equipment Regulations (PUWER) 1998 covers the use of all kinds of work equipment from hand tools to a complete manufacturing process equipment. The operation of such tools includes starting, stopping, repairing, modifying, installing, dismantling, programming, setting, transporting, maintaining, servicing and cleaning. The specific requirements include:

1. Guarding dangerous parts of machinery;
2. Equipment is suitable for its intended use;
3. Equipment conforms with the EC product safety directive;
4. Equipment is in efficient working order and in a good state of repair.

Equipment selection criteria:

1. Sourced from a reputable supplier;
2. Supplied with clear and understandable operating instructions;
3. Provided with physical evidence of conformity to EC Directives;
4. Significant risks associated with its use must be assessed and adequately controlled;
5. All equipment is visually checked before use.
9 Performance Evaluation

9.1 Monitoring, Measurement, Analysis & Evaluation

9.1.1 General

Your organization measures its safety performance and compliance through by using leading (proactive) and lagging (reactive measures) to monitor and measure the safety performance data that is needed to make effective data-driven, safety decisions.

Top management receive regular reports on the health and safety performance and the actions of contractors. Performance reports are prepared on monthly basis by the Health & Safety Manager and communicated to the Top management. The frequency at which our safety processes are monitored, measured, analyzed, and evaluated is determined by:

1. Statutory and regulatory requirements;
2. Process performance and audit results;
3. Level of risk and types of control measure;
4. Trends in incidents or corrective actions.

Ongoing monitoring of normal operations includes the assessment of whether safety processes and safety procedures are followed correctly and, when they are not followed, investigations are carried out to determine and correct the root cause. Your organization achieves greater support for health and safety by involving our workers in monitoring.

Engineering controls are regularly inspected and tested to ensure their integrity. Engineering controls, including safety devices are regularly inspected and tested to ensure their integrity, effectiveness and correct operation.

Inspection, measuring and testing equipment related to health and safety monitoring is identified, calibrated, maintained, stored, and used according to the manufacturer’s instructions and/or specifications in relevant standards. Records of calibration are retained. Examples of inspection, measuring and test equipment includes:

1. Pressure regulators,
2. Sound level meters,
3. Oxygen monitors.

Effective monitoring of sickness absence and workplace health can alert the board to underlying problems that could seriously damage performance or result in accidents and long-term illness. The collection of workplace health and safety data can allow the board to benchmark our organization's performance against others in our sector.

Your organization ensures that proactive measurements such as maintenance, testing, and examination of certain control measures and, in some circumstances, health surveillance are legal requirements; they are monitored for performance and compliance. Where required, health and medical surveillance is planned and is sufficient to:

1. Identify occupational ill health in workers, where any exposure could reasonably give rise to an identifiable condition, with valid detection measures;
2. Identify any trends or clusters of occupational ill health;
3. Identify if control measures are effective.
10 Improvement

10.1 General

The Health & Safety Manager uses a range of the performance evaluation tools highlighted in Section 9 to make recommendations for improvement and to achieve the intended outcomes of our health and safety management system. Recommendations may emerge from workers or interested party suggestions or concerns, Health & Safety Committee meetings, hazard reviews, task analysis, physical inspections, and internal audits findings.

In order to determine and select opportunities for improvement or to implement any necessary actions to meet the requirements of workers and relevant interested parties, your organization drives improvement via the analysis of relevant data. The data inputs for the improvement process include:

1. Risk and opportunity evaluations;
2. Assessment of the changing needs and expectations of interested parties;
3. Assessment of the changing needs of the business;
4. The conformity of existing operations, products, and services;
5. The effectiveness of our health and safety management system and trends in:
   i. Accident, Incident Frequency Rate (AFR);
   ii. Number of Incident Reports;
   iii. Total Recordable Injury Rate;
   iv. Injuries beyond First Aid at work;
   v. Near Miss Reports;
   vi. Property Damage Incidents;
   vii. Vehicle Incidents;
   viii. Occupational Illnesses;
   ix. Complaints;
   x. Insurance claims.
6. Supplier performance;
7. Reducing or eliminating adverse OH&S hazards;
8. Complaints and feedback;
9. Internal and external audit results;

Your organization also ensures that opportunities for improvement from daily feedback on operational performance are evaluated by the Health & Safety Manager as appropriate. Changes are typically implemented through the corrective action system.

10.2 Incident, Non-conformity & Corrective Action

10.2.1 Incident Investigation

Your organization has implemented the Incident Investigation Procedure for the handling of, and the investigation of accidents, incidents and near misses. The procedure defines the controls for reporting and establishing the root-cause of all types of accident, incident or near miss that may occur on our premises. Any staff member who is involved in an accident, near miss or any dangerous incident must report the occurrence
Appendices

A.1 Management System Process Interaction

1. Management & Review Processes

1. PLAN
   - Strategic direction, operational purpose
   - Operational planning and emergency planning

2. DO
   - Performance evaluation and management review
   - Incident investigation, corrective action and improvement

3. CHECK
   - Incident investigation, corrective action and improvement

4. ACT

OH&S Requirements
- Policies, Objectives & SPIs
- Communication/Awareness
- Participation/Competence
- Risk assessment
- Responsibilities & Authority

OH&S Data Points
- Supplier Metrics
- Process Metrics
- Product Metrics
- Incident Frequency
- Non-conformances

2. Operation Processes

1. Receive Order
2. Contract Review
3. Produce Quote
4. Order Acceptance

5. Specifications & Designs
6. Engineering Change Control & Validation
7. Purchasing & Outsourcing Controls
8. Receiving Inspection, ID & Traceability

9. In-process Inspection
10. Final Acceptance
11. Packaging & Product Storage
12. Dispatch

A. New or Existing Product?
- Existing
- New

B. Production & Assembly Processes
- Non-conforming

C. Non-conforming Outputs
- Non-conforming

3. Support & Assurance Processes

Workers & Interested Parties