Implementing a Safety and Health Self-Management System

A Guide to the ACTION Programme
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1 Overview of the ACTION Programme

1.1 Background to the Programme

The Labour Department holds firmly to the view that a national programme promoting the implementation of occupational safety and health management systems (OSHMS) at the enterprise level would lead to greater social protection of workers in Barbados. It would also enable employers to better comply with the requirements of the Safety and Health at Work Act (Cap 356). In developing the national programme, ACTION (A Commitment to Improving Our Nation), the Safety and Health at Work Self-Management Program (PASST) implemented in Mexico, was used as a model.

The primary intention of PASST was the promotion of safety and health management systems within enterprises and the active involvement of all workers in the management of safety and health at workplaces. The model was therefore adapted to suit the Barbadian context.

The ACTION programme is intended to encourage self-regulation through the application of OSHMS at the enterprise level. The Department is cognisant of its mandate to promote the highest standards of occupational safety, health and welfare. A number of checks and balances have therefore been designed into ACTION to ensure that there are no mismatches between the stated safety policies of organisations and the actual practices. It was also recognised that the provision of incentives would need to be an integral part of the programme to encourage participation.
1.2 Programme Entry Requirements

Employers wishing to be participants in the programme will be required to complete and submit an internal self-audit checklist. This document would serve two main purposes:

1. It would allow the company to assess current safety and health standards and compliance with the programme requirements which would be outlined in the programme guidance documents;

2. It would give the Labour Department an idea of the safety and health standards at the company.

A copy of the Internal Self-Audit Checklist\(^1\) can be found in Appendix 5.

The company would also be required to submit a copy of its safety policy. The policy must have the following format as mandated by the section 7(4) of the Safety and Health at Work Act (Cap 356):

- statement of policy;
- arrangements in place to implement the policy; and
- organisation in place to implement the policy.

The Arrangements section of the policy must include procedures for ensuring that the Policy is communicated to employees and periodically reviewed.

A description of the processes and a layout of the premises must be submitted in addition to the safety policy.

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\(^1\) This form will be provided to the Company by the Labour Department on notification of interest in joining the programme.
2 Steps to Developing a Safety Management System

2.1 Initial Safety and Health Management System Review

An initial review will have to be undertaken by the organisation to examine the current level of safety and health compliance. Such an assessment would indicate the areas in need of improvement. During the review, the existing safety and health practices should be compared with:

- the requirements of all applicable safety and health legislation;
- the provisions set out in the organisation’s policy statement;
- existing credible local, regional and international safety and health guidance; and
- best practice in the organisation’s economic sector/industry standards.

At a minimum, in order to comply with safety and health legislation, the organisation must:

- identify hazards and conduct risk assessments;
- prepare and implement the safety policy requirements; and
- have in place effective safety consultation and employee participation programmes.

Additional activities that can be used to obtain information on the organisation’s current safety and health status include:

- workplace inspections and interviews;
- management systems audits; and
- consultation with workers, contractors, regulatory agencies or other interested parties.

The initial review provides useful information that can guide the planning process.
2.2 Safety and Health Policy and Commitment

2.2.1 General

Section 7 of the Safety and Health at Work Act states:

(4) It shall be the duty of every occupier to prepare and as often as may be appropriate, revise a statement of general policy with respect to workplace, safety, health and welfare, and the organisation and arrangements for the time being in force for carrying out the policy, and to bring the policy and any revision of it to the notice of all employees.

(5) Where 10 or more persons are employed the statement of policy and the organisation and arrangements for the time being in force for carrying out the policy required by subsection (4) shall be in writing.

In preparing the policy statement, the organisation demonstrates a commitment to the continuous improvement of safety, health and welfare within the organisation. The policy recognises that safety and health is an integral part of the organisation’s business performance and as such, the necessary resources should be made available in order to implement the plan. The document should specify those responsible for implementing the policy at all levels within the organisation, including senior managers, first-line managers and supervisors. It should define their safety and health responsibilities, as well as those of employees. The key to effective safety management is ensuring that the safety policy is implemented and considered in all aspects of the business.
2.2.2 Safety and Health Policy Statement

The safety policy opens with a statement of general intent and must be specific to the organisation to which it pertains. It also has to be appropriate to the nature of the organisation’s work activities. The policy statement, which must be signed by the highest member of the organisation’s management, should include a commitment to:

- comply with safety and health legislation, regulations and codes of practice;
- protect employees and others, such as contractors and members of the public from the risks associated with its operations;
- prevent accidents and ill-health;
- continuous improvements by setting, auditing and reviewing safety and health objectives and targets; and
- consult with workers on matters that impact on safety and health.

A model health and safety policy statement can be found at Appendix 1.
2.3 Planning

After outlining a commitment, the organisation needs to plan a course of action which will allow the fulfilment of commitments made in the safety and health policy statement. Planning is thus an integral part of all aspects of safety and health management because it ensures that the organisational structures and arrangements are effective and suitable for the nature of the work of the organisation. The primary concern of planning should be the prevention of accidents and ill-health through the identification, elimination and control of hazards and risks.

The plan should set out:
1. Clear performance standards;
2. Defined work programmes;
3. Designated responsibilities; and
4. Time frames for the completion of tasks.

In planning to meet the commitments set out in the policy, consideration needs to be given to:
1. identifying hazards, assessing risks and determining controls;
2. examining all legal and other requirements; and
3. establishing and setting safety and health objectives and targets.

Some of the information needed may have already been obtained in the initial safety and health management review.
2.3.1 Hazard Identification, Risk Assessment and Control Measures

The identification of hazards and the corresponding control measures provides the foundation for a safety programme. It determines the scope, content and complexity of the management system to be implemented. The management system of an organisation with few hazards would be expected to be less complex than that for an organisation with many hazards. It is essential that all the significant hazards that may exist in the organisation are identified and controlled.

A ‘hazard’ may be defined as anything that has the potential to cause harm. It is essential that the organisation develops an inventory of the hazards that may exist in order to implement adequate controls. To identify the hazards that are present, consideration must be taken of the routine and non-routine activities within the organisation as well as the activities of all legitimate visitors such as guests and contractors.

Once the inventory of hazards has been developed, the risks associated with them need to be evaluated and a determination has to be made as to whether the existing controls are adequate. ‘Risk’ is the combination of the likelihood of an occurrence of a hazardous event or exposure and the severity of injury or ill-health that can be caused by the event or exposure. Section 6 (2) of the Safety and Health at Work Act requires that a suitable and sufficient assessment of the risks be undertaken and that measures are taken to eliminate or reduce the risks. In order to adequately do this one must:

1. identify the hazards;
2. estimate the associated risks taking into account the adequacy of any existing controls;
3. determine whether the risks are acceptable; and
4. determine the appropriate and effective risk controls to reduce risks where necessary.

In applying control measures for the hazards identified, the following hierarchy should be utilised:

1. elimination of the hazardous articles/processes;
2. substitution of the hazardous articles/processes for a less hazardous one;
3. institution of engineering controls to provide a physical barrier between the employee and the hazard;
4. institution of administrative controls such as written rules, signage and warnings; and
5. the provision and correct use of personal protective equipment.

In high hazard industries consideration needs to be given to events which have a low probability of occurring but still have high impact consequences, to ensure that adequate control is achieved.

2.3.2 Examination of all Legal and Other Requirements

It is important that the organisation identifies all applicable legal requirements. At the very minimum, organisations have to comply with following legislation:

- Safety and Health at Work Act (Cap. 356) and any associated regulations;
- Employment (Miscellaneous Provisions) Act (Cap. 346);
- Radiation Protection Act (Cap. 353A);
- Shops Act (Cap. 356A);
- Labour Department Act (Cap. 23);
- Accident and Occupational Diseases (Notification) Act (Cap. 338)

The organisation should have a mechanism which allows it to remain up-to-date with all legal requirements. In addition, the organisation should also be aware of the international standards that apply to their field of activity.
2.3.3 Establishing and Setting Safety and Health Objectives and Targets

The organisation needs to establish targets and objectives that will enable it to meet its commitments as outlined in the safety policy statement while minimising risk. This is an integral part of the OSHMS. These objectives should:

- be specific, measurable, attainable, realistic and time-bound;
- allow for continuous improvement in safety and health performance; and
- be supported by specific performance standards.

The objectives set should take into account the hazards identified, the risk control measures and the legal requirements. The safety and health committee or safety delegate should be involved in the setting of these objectives. It is important that workers are consulted in this process so that the objectives that are set are reasonable and practical. At the start of the programme, it is advised that a manageable number of objectives are set. It is best to focus initially on the most significant safety and health issues that need to be addressed. Invariably this would include compliance with the legislation and reduction in injury and ill-health statistics. It must be stated that these objectives need to be reviewed and re-evaluated and updated periodically to ensure that they remain relevant. Examples of objectives that could be used include:

- increase usage rate of hearing protection in designated hearing protection zones from the present (baseline) value of 20% to 100% within one year;
- decrease the number of notifiable accidents by 100% within one year.

Once the objectives have been established, a programme of action needs to be put in place to ensure that the objectives and safety targets are met. Such a programme should include:

- operational plans to implement measures to control the risks that have been identified and conform with any legal requirements;
- contingency plans to mitigate or avoid the effects of foreseeable emergencies (e.g. fire, first aid);
- plans to mitigate the effects of any changes associated with plant or
technology, working procedures or staffing (e.g. retrenchment of staff);
• plans to control the activities of contractors and other legitimate visitors;
• plans for monitoring and reviewing safety performance; and
• plans for the involvement of workers.
2.4 Implementation and Operation

The Implementation phase involves putting the programme developed from the Planning phase into operation. In this regard attention has to be given to:

1. organising for safety and health;
2. safety consultation;
3. training, awareness and competence;
4. communication;
5. documentation; and
6. risk control systems/measures.

2.4.1 Organising for Safety and Health

The employer has the ultimate responsibility for safety and health in the workplace. Aspects of this responsibility are given to executive directors, senior managers, line managers, supervisors and employees. The roles and responsibilities should be clearly defined for each individual in the organisation and communicated to them. Such responsibilities include, but are in no way limited to, responsibilities for:

1. assessing risks and implementing appropriate action;
2. identifying maintenance needs, drafting maintenance procedures and purchasing equipment;
3. supervising and training new recruits and young workers;
4. identifying training needs and organising relevant training;
5. monitoring conditions and safe work practices;
6. Investigating accidents and work-related illness;
7. maintaining emergency provisions (escape routes, fire extinguishers, alarms, evacuation procedures); and
8. monitoring and reviewing safety performance.

Some of the aforementioned responsibilities may require a group of people to discharge (e.g. the safety committee). The persons responsible for these duties should have been identified during the Planning phase.

In general, all staff should be aware of their responsibility for personal safety and that of others.
2.4.2 Consultation
The effective implementation of any safety management system requires the commitment and support of the employees. As they have first-hand experience of activities that occur in the workplace, employees are a valuable resource which should be used in the development and operation of the safety management system. It is important that management consults with employees in the development of measures that will improve safety and health standards in the workplace.

Consultation can be defined as the process by which management and workers or their representatives jointly discuss issues of mutual concern with the goal of seeking acceptable solutions through the general exchange of views and information.

Consultation can take place on many aspects of the work environment for example:

- new and modified equipment;
- new chemicals or materials;
- new processes, procedures or work patterns; and
- a change of building use, modifications or construction.

Joint safety and health committees are a proven way of ensuring worker involvement as the committee can assist in areas such as:

- reviewing operating procedures and the safety policy;
- conducting investigations; and
- measuring performance.

To increase the effectiveness of the safety and health committee, arrangements should be put in place to ensure that safety and health representatives have the necessary time, resources and training.

2.4.3 Training, Awareness and Competence
The success of any safety management system is dependent on the ability of the employees to do their work safely. To do this they need to be knowledgeable of the hazards and risks which they face. They also need to be able to use their knowledge and skills to work in a safe manner. Procedures
need to be in place to ensure that workers receive the necessary training, instruction and supervision to develop the requisite competencies.

Such procedures should ensure that:

- personnel have the necessary qualifications in terms of education, training and/or experience for their roles and responsibilities;
- refresher training to maintain or enhance competence to include, where necessary, contractors, employees, self-employed persons, or temporary workers who are working in the organisation is conducted;
- induction and on-going training for workers to maintain or enhance employees’ knowledge of the safety and health arrangements, hazards, risks, and their ability to take the appropriate precautions is undertaken; and
- training for all individuals who manage staff, contractors and others.

Apart from employees, the abilities of contractors to work in a safe manner also need to be checked. Arrangements need to be in place to ensure that only competent contractors are selected.

2.4.4 Communication

It is important that information concerning the hazards and management system is effectively communicated throughout the organisation and to contractors and other visitors to the workplace. The communication processes must take into account the need for information throughout the organisation.

The following should be communicated to all persons who are working under the control of the organisation:

- management’s commitment to safety and health;
- the safety policy, its goals and objectives;
- roles and responsibilities of each individual in the organisation;
- safety and health arrangements.

There are number of means in which information can be communicated. A few of these are outlined below:
• safety and health briefings and meetings;
• induction/orientation talks or toolbox talks;
• newsletters, posters, e-mails, suggestion boxes/schemes, websites, notice boards.

Managers, particularly directors and other senior managers, can communicate powerful signals about the importance and significance of safety and health objectives by their example. Successful methods of demonstrating management commitment include:

• regular safety and health tours (these are not detailed inspections but quick safety and health checks);
• chairing meetings of the joint safety and health committee;
• active interest in investigations of accidents, ill-health and incidents and swift implementation of corrective measures.

There should be defined arrangements in place for the communication of safety arrangements to contractors. This information may be passed on in the written contract. Contracts may need to be supplemented by pre-project safety and health planning meetings to ensure that appropriate controls are implemented.

For visitors, communication of the relevant safety information can be through verbal and written means, warning signs and security mechanisms. Information that needs to be conveyed includes:

• safety and health requirements relevant to the visit;
• evacuation procedures and responses to alarms;
• access controls and escort requirements; and
• the use of personal protective equipment.

2.4.5 Documentation
This section outlines the minimum requirements for documentation. The organisation should produce and maintain up-to-date documentation that is sufficient to ensure that its safety management system is effective and complies with legal requirements. Section 93 of the Safety and Health at Work Act requires every occupier to keep a general register. The following is a list of
some of the information that should be documented:

- a copy of all accident and incident reports (the Accident and Diseases (Notification) Act requires all workplace accidents to be recorded);
- fire safety certificate from the Chief Fire Officer;
- examination certificates for air receivers, boilers, hoists and lifts;
- any reports regarding safety and health conditions in the workplace inclusive of any accident and ill-health investigations, audits and performance reviews; and
- copies of any Safety Data Sheets.

In general, if there is the possibility that a task, through lack of written procedures or instruction, will not be performed in the required manner then a written procedure is required.

An assessment needs to be undertaken by the organisation to ensure that the documentation present is proportional to the level of complexity of the hazards and risk concerned yet kept to the minimum required for effectiveness and efficiency. Clear procedures must be in place for the control, review and updating of documents.
2.4.6 Risk Control Systems/Measures

The main objective of risk control measures is to manage the safety and health risks to fulfil the commitments in the safety policy. When developing control measures, priority should be given to control options with higher reliability in preventing injury and ill-health, consistent with the hierarchy of controls. These controls are developed from the process of hazard identification and risk assessment.

Examples of some typical control measures are:

- regular maintenance and repair of facilities, machinery and equipment to prevent unsafe conditions from developing;
- good housekeeping and maintenance of clear walkways and traffic management;
- regular maintenance and monitoring of the indoor air quality and ventilation systems;
- provision, control and maintenance of personal protective equipment; and
- emergency preparedness and response procedures.
3 Measuring Performance

The primary purpose of measuring performance is to assess the implementation and effectiveness of the arrangements for controlling risk. It enables the organisation to discharge its responsibilities under Section 7(4) of the Safety and Health at Work Act where organisations are required not only to prepare but to revise as often as necessary a safety policy. Measuring performance provides information on the current status and progress of activities used by the organisation to control risks to safety and health. Once this information is received, corrective action such as rearranging roles and responsibilities and improving operational arrangements can be taken.

There should be well defined procedures for systematic monitoring of the workplace. The primary methods of monitoring safety and health performance are through proactive and reactive techniques.

Proactive monitoring measures how effectively the health and safety management system is functioning. Examples of proactive monitoring include:

- informal workplace inspections;
- systematic workplace inspections using a checklist;
- workplace environmental monitoring;
- inspections of plant and machinery;
- systematic reviews of the risk assessments to determine whether they need to revised; and the
- analysis of safety and health management systems records.

Reactive monitoring identifies control failures by investigating cases of accidents, ill-health and near misses. There should be clearly defined procedures for investigating these occurrences. The findings of these investigations should be documented.

An organisation needs to engage in both types of performance monitoring. An exclusive reliance on reactive monitoring will result in the organisation’s management system remaining dormant until some serious accident or
incident occurs. An accident investigation may prove that risk control measures that were identified during proactive monitoring were inefficient and highlight the need to urgently review the measures and make improvements.

Monitoring should be done of hardware (premises, plant and substances) and software (people, procedures and systems).

Measurements should be done against agreed standards to show where improvements are needed. It is useful for the organisation to have:

- leading performance indicators which are measures of compliance (e.g. compliance with risk controls; level of personal protective equipment usage; level of compliance with statutory requirements etc.); and
- lagging performance indicators which are measures of undesired consequences (accidents, near misses etc.) of inadequate health and safety arrangements.

Benchmarking against business competitors and best practice in the organisation’s employment sector can be used to develop appropriate performance indicators. Such indicators assist in the audit and review of the health and safety performance.
4 Auditing and Reviewing Performance

4.1 Auditing
Auditing is the structured process of collecting information on the effectiveness and reliability of the total safety and health management system and drawing up plans for corrective action. The goals of any system of auditing are therefore to establish that:

- management arrangements suitable to the organisation are in place;
- adequate risk control systems are implemented and are suitable to the nature of the hazards that exist; and
- appropriate workplace precautions are in place.

Audit protocols and procedures should be established, documented and maintained and should include the following:

- adequate allocation of resources;
- personnel requirements;
- methodologies for conducting the audit which may include checklists, questionnaires, interviews, measurement and direct observation; and
- procedures for documenting the findings of the audits and for undertaking corrective action.

The nature and complexity of an audit will vary according to the size, and sophistication of the organisation.

4.2 Reviewing Performance
The review of performance is based on the information gained from measuring performances and the audit process. Internal reference to key performance indicators which are selected from the leading and lagging performance indicators needs to be made. Where substandard performance has been identified, then a plan should be developed to correct it.
4.3 Action for Improvement

Procedures need to be in place to ensure that lessons learnt from the audit and reviews of performance are executed. The root causes of any non-conformity have to be identified and a plan has to be developed to remedy it. This acts as a loop which feeds into the other elements, resulting in improvements to the organisation and arrangements that have been put in place to manage safety and health.
5 Bibliography


Appendix 1

Sample Health and Safety Policy Statement

The Company recognises the fact that health and safety has positive benefits to the organisation and commitment to a high level of safety makes good business sense. It also recognises that safety and health is a business function and must therefore, continually progress and adapt to changes. The approach to health and safety will be based on the identification and control of risks.

As there are distinct benefits to be gained from providing a safe and healthy working environment, appropriate levels of resources will be allocated to ensuring health and safety within the organisation. A positive culture will be encouraged within the organisation and this encouragement shall be actively supported by senior management.

All employees will be involved in the decision-making processes. The performance of both individuals and the organisation will be monitored to pre-determined standards with continual improvements being made to health and safety standards. Adequate planning, monitoring and review of the implementation of the safety and health policy will be carried out.

In order to ensure that this general statement is achieved, the following will form the company’s aims and objectives.

1. The company will ensure that there are arrangements in place for the effective planning, development and review of this policy statement.

2. Management will ensure that appropriate systems are developed and maintained for the effective communication of safety and health matters throughout the organisation.

3. The company will provide the necessary information, instruction and training to employees and others, including temporary staff to ensure their competence with respect to safety and health.

4. Management considers that safety and health rates equal to all other business functions and will attach equal importance to achieving safety and health targets.

5. The company will devote the necessary resources in the form of finance, equipment, personnel and time to ensure health and safety. The assistance
of expert help will be sought where the necessary skills are not available within the company.

6. The company will liaise and work with all necessary persons to ensure health and safety. The company will also ensure that adequate arrangements are also in place for ensuring the safety and health of visitors.

7. The company believes in constantly improving health and safety standards and performance. It will to this end endeavour to ensure that all relevant statutes, Regulations and Codes of Practice are complied with. The minimum standards that will be adopted by the company are those required by law, although the company will seek always to exceed these where there is a demonstrable benefit.

8. The company recognises that safety is the responsibility of everyone within the organisation and is not just a function of management. Managers will have specific duties and responsibilities to comply with the letter and spirit of company policy. Employees will have specific responsibilities to take reasonable care of themselves and others who could be affected by their activities and to co-operate with management in achieving the standards required. The company will ensure that safety and health management is an integral part of the manager’s function and will monitor their performance along with their other duties.

9. The company will ensure that safety and health is fully integrated into the management and decision-making processes within the organisation.

10. The company will set up a system to ensure that accidents and near-misses are fully investigated and appropriate action taken to reduce the likelihood of their occurrence.

11. The company will ensure that procedures are established to ensure that safe equipment and plant are provided for employees and non-employees.

Signed…………………………………………… Date……………………………………………………..
### Appendix 2

**Model Safety and Health Responsibilities**

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<th>Role</th>
<th>Responsibility</th>
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| Managing Director | - Understanding the main requirements of the Safety and Health at Work Act  
- Reviewing the performance of directors  
- Allocating the necessary resources for health and safety  
- Ensuring that the organisational structure is appropriate to manage health and safety  
- Supporting directors in policy-setting  
- Assuming ultimate responsibility  
- Ensuring that the same management standards are applied to health and safety as to other management functions  
- Ensuring that health and safety is integrated into the management structure  
- Ensuring that equal importance is applied to health and safety as to other business functions |
| Directors      | - Understanding the requirements of the Safety and Health at Work Act  
- Ensuring that competent persons are employed to assist the employer in carrying out his statutory responsibilities  
- Setting company policy and direction  
- Developing health and safety strategies and company objectives  
- Reviewing company performance  
- Ensuring that responsibilities are correctly assigned within the company  
- Ensuring that adequate resources are made available  
- Ensuring that managers are adequately trained and capable  
- Ensuring the effective implementation of company policy  
- Reviewing the effectiveness of the policy  
- Ensuring the managing director is informed of progress and developments  
- Ensuring that authorised persons are appointed to assist in evacuation procedures  
- Carrying out audits of their areas of responsibilities/organising audits to be carried out |
| Managers                                                                 | - Ensuring that supervisors are properly trained and instructed as to their duties and responsibilities  
| - Ensuring that supervisors carry out their assigned responsibilities and review their performance accordingly  
| - Making recommendations for improving performance  
| - Allocating the necessary resources within their control  
| - Ensuring that accidents and near-misses are recorded and investigated  
| - Drawing up annual action plans for health and safety  
| - Setting personal objectives and targets  
| - Monitoring of contractors  
| - Ensuring that the company policies and procedures are distributed  
| - Ensuring that appropriate equipment is available  
| - Ensuring that first aiders are trained  
| - Each shift is covered by adequate number of first aiders  
| - Monitoring the implementation of the policy  
| - Understanding company policies and procedures  
| - Keeping relevant documentation  
| - Carrying out audits of their areas of responsibilities and undertaking workplace inspections  
| - Ensuring that equipment etc is maintained in a safe condition |
| Supervisors              | Ensuring that employees are adequately trained, instructed and informed  
| - Providing a suitable level of supervision  
| - Understanding the company policy and procedures  
| - Allocating work in accordance with the employee's level of training  
| - Ensuring that defective equipment is taken out of use  
| - Reporting defective equipment  
| - Informing employees of their responsibilities  
| - Encouraging employees to report defects and suggest improvements  
| - Ensuring that correct work procedures are adhered to  
| - Carrying out regular inspections of the workplace  
| - Reporting accidents and near-misses  
| - Assisting in the investigation of accidents and near misses  
| - Providing induction training  
<p>| - Setting a good personal example |</p>
<table>
<thead>
<tr>
<th>Employees</th>
<th>- Working in accordance with company procedures</th>
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<tbody>
<tr>
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<td>- Reporting defective equipment and dangerous situations</td>
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<td>- Using safety equipment provided</td>
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<td>- Avoiding horseplay</td>
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<td>- Complying with management requests and instructions</td>
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<td>- Not using defective equipment</td>
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<td>- Not misusing equipment</td>
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<td>- Not damaging equipment</td>
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<td>- Exercising reasonable care towards themself and others</td>
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<td></td>
<td>- Not undertaking tasks that they are not trained for</td>
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Appendix 3

Duties and Responsibilities of the Safety and Health Committee

Employers are required to consult with their employees in relation to any safety and health issues. In companies where there are twenty five or more employees this consultation takes the form of a safety and health committee. The composition of the committee is prescribed by law (section 103 of Cap 356) and there must equal numbers of management and employees representatives on the committee. It must be borne in mind that the responsibility to manage remains with the employer. Some recommended responsibilities of the Safety and Health committee is outlined below:

✔ Members of a safety and health committee should promote health and safety in the workplace at all times.

✔ The safety and health committee should be involved in the monitoring the workplace for hazards on a regular basis. Regular monitoring for hazards can help to prevent work-related illnesses and injuries. It is a good practice to involve committee members in inspections of any areas of the workplace where specific problems have been identified so that the problems or progress in dealing with them can be discussed at the meeting.

✔ Members of the committee could be involved in the monitoring of workplace conditions; walk-around inspections of the plant (including government inspections), accident investigations and in any medical surveillance programmes of the workforce.

✔ A committee should be consulted when planning health and safety training for the workforce.

✔ The safety and health committee should be consulted in the development of the safety and health policy and its implementation.

✔ The safety and health committee has the responsibility to inform the management about hazardous situations in the workplace.

✔ The committee has the responsibility to respond to and resolve worker safety and health complaints as quickly as possible. This includes working with management to resolve problems.

✔ The committee should handle safety and health grievances.
The committee should promote compliance with safety and health regulations.

The focus of the safety and health committee should not only be legal compliance but on the attainment of the highest possible standards of safety and health.

The committee should be involved in the planning of any proposed changes in the workplace and in working conditions that will affect the safety and health of the workforce.

The committee must function in close cooperation with the union. The committee should keep members informed about actions planned and/or implemented in the workplace.

An effective safety and health committee may improve the morale of workers, particularly when workers see positive changes achieved through the efforts of the committee.
Appendix 4

Terms of Reference of the Safety and Health Committee

This is a document that usually describes or outlines the scope, purpose, structure, function, responsibilities and governs the operation of a safety and health committee. The terms of reference should give attention to the following matters:

- Purpose of the committee
- Role of the committee
- Committee membership
- Selection of employee representatives
- Selection of employer representatives
- Ex-Officio members on the committee
- Duties of Chairman or Co-Chair
- Duties of the secretary
- Relationship between Safety Officer and the Committee
- Duties of Members and Officers
- Term of appointment
- Elections
- Quorum
- Committee reports
- Rights of the committee
- Other employee obligations to support the committee
- The formation of Sub-committees
Appendix 5

Internal Self-Audit Checklist

Occupational Safety and Health Programme Checklist

Use this checklist to make sure that you have all the necessary information in your safety management system program.

<table>
<thead>
<tr>
<th>Safety Management System Program Checklist</th>
<th>OK</th>
<th>NOT OK</th>
<th>Recommended Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>COMPANY OCCUPATIONAL SAFETY POLICY</td>
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<tr>
<td>The OSH Policy is:</td>
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<tr>
<td>• Written</td>
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<tr>
<td>• Communicated</td>
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<tr>
<td>• Policy Posted</td>
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<td>• Policy Reviewed</td>
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<tr>
<td>Specific responsibilities are assigned</td>
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<tr>
<td>Safety and health objectives are set</td>
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<tr>
<td>SAFETY AND HEALTH LEGISLATION</td>
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<tr>
<td>Front Line Managers/Supervisors</td>
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<tr>
<td>• Trained in OSH</td>
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<tr>
<td>• Understand their duties</td>
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<tr>
<td>• Held accountable for OSH</td>
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<tr>
<td>Employees</td>
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<tr>
<td>• Trained in safe work practices</td>
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<tr>
<td>• Understand their duties</td>
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<td></td>
<td></td>
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<tr>
<td>• Aware of their rights</td>
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<tr>
<td>• Report unsafe conditions practices</td>
<td></td>
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<tr>
<td>• Participate in the development of OSH programmes and safe work</td>
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<tr>
<td>WORKPLACE HAZARDOUS MATERIAL INFORMATION SYSTEM</td>
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<tr>
<td>Material Safety Data Sheets readily available</td>
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<tr>
<td>Product labels on all containers</td>
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</tbody>
</table>
## Occupational Safety and Health Programme Checklist

<table>
<thead>
<tr>
<th>Safety Management System Program Checklist</th>
<th>OK</th>
<th>NOT OK</th>
<th>Recommended Action</th>
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</thead>
<tbody>
<tr>
<td><strong>ASSESSMENT OF RISKS</strong></td>
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<tr>
<td>Procedures in place to ensure that OSH risks are assessed</td>
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<tr>
<td>Responsibilities assigned for risk assessments</td>
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<tr>
<td>Routine job hazard analysis</td>
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<tr>
<td>Written safe working procedures:</td>
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<tr>
<td>▪ Communicated</td>
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<td>▪ Understood</td>
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<tr>
<td>▪ Followed</td>
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<tr>
<td>▪ Feedback provided</td>
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<tr>
<td><strong>SAFETY CONSULTATION</strong></td>
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<tr>
<td>Safety Committee in place (applies where there are 25 or more employees)</td>
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<tr>
<td>Safety Delegate (applies where there are less than 25 employees)</td>
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<tr>
<td>Terms of reference of the safety committee established</td>
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<tr>
<td>Training provided for safety committee members</td>
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<tr>
<td>Regular meetings of the Safety and Health Committee held</td>
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<tr>
<td>Minutes of the safety and health minutes posted (Committee)</td>
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<tr>
<td>Recommendations of the safety and health committee followed</td>
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<tr>
<td>Regular inspections done by safety and health committee</td>
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<tr>
<td>Reports considered at committee meetings</td>
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<tr>
<td><strong>WELFARE PROVISIONS</strong></td>
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<tr>
<td>Bathroom Facilities</td>
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<tr>
<td>Lunchroom Facilities</td>
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<tr>
<td>Supply of Drinking Water</td>
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<tr>
<td>Changing Facilities</td>
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<tr>
<td><strong>HAZARD REPORTING</strong></td>
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<tr>
<td>Reporting system and format established</td>
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<tr>
<td>Responsibility for follow-up assigned</td>
<td></td>
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<tr>
<td>Management responds to hazard reports</td>
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</tbody>
</table>
### Occupational Safety and Health Programme Checklist

<table>
<thead>
<tr>
<th>Safety Management System Program Checklist</th>
<th>OK</th>
<th>NOT OK</th>
<th>Recommended Action</th>
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</thead>
<tbody>
<tr>
<td><strong>INCIDENT AND ACCIDENT REPORTING</strong></td>
<td></td>
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<tr>
<td>All employees understand the purpose of investigations</td>
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<tr>
<td>All incidents and accidents reported</td>
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<tr>
<td>Established procedure understood by all</td>
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<tr>
<td>Clearly defined responsibility for investigation</td>
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<tr>
<td><strong>INVESTIGATION AND FOLLOW UP</strong></td>
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<tr>
<td>Written investigation procedures established</td>
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<tr>
<td>Staff trained in conducting investigations</td>
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<tr>
<td>Clearly defined reporting procedures</td>
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<tr>
<td>Responsibility for corrective action defined</td>
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<tr>
<td>Results of investigation and corrective actions communicated</td>
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<tr>
<td>Corrective measures implemented</td>
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<tr>
<td>Personal protective equipment given where appropriate</td>
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<tr>
<td><strong>ACCIDENT AND INJURY RECORDS</strong></td>
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<tr>
<td>All cases of injury and illness documented</td>
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<tr>
<td>Injury and illness data annually reviewed</td>
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<tr>
<td>Long-term and short-term accident prevention goals developed</td>
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<tr>
<td>Written procedures established</td>
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<tr>
<td><strong>EMERGENCY PROCEDURES</strong></td>
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<tr>
<td>All potential emergencies identified</td>
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<tr>
<td>Written procedures communicated</td>
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<tr>
<td>Responsibilities assigned</td>
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<tr>
<td>Evacuation procedure established</td>
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<tr>
<td>Responsibility for all clear signal known</td>
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<tr>
<td>Firefighting apparatus provided and maintained</td>
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<tr>
<td>Training in use of firefighting apparatus</td>
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<tr>
<td>Emergency alarm visible and audible</td>
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</table>
## Occupational Safety and Health Programme Checklist

<table>
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<tr>
<th>Safety Management System Program Checklist</th>
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<tbody>
<tr>
<td><strong>FIRSTAID</strong></td>
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<tr>
<td>First aid facilities clearly indicated</td>
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<tr>
<td>Responsibilities for first aid assigned</td>
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<tr>
<td>Trained first aid staff available</td>
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<tr>
<td>First aid box/kit maintained</td>
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<tr>
<td>Procedure for seeking first aid established, communicated and understood by everyone</td>
<td></td>
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<tr>
<td><strong>TRAINING AND TRANSFERRED EMPLOYEES</strong></td>
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<tr>
<td>OSH part of employee orientation</td>
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<tr>
<td>Safety part of the orientation package</td>
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<tr>
<td>On the job training provided</td>
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<tr>
<td>Responsibility for training needs assigned</td>
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<tr>
<td>Knowledgeable person conducting training</td>
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<tr>
<td>Training focus on workplace specific needs</td>
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<tr>
<td>Periodic training provided and updated</td>
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<tr>
<td><strong>COMMUNICATION</strong></td>
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<tr>
<td>Planned staff safety meetings (toolbox talks etc.)</td>
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<tr>
<td>Safety on management meeting agenda</td>
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<tr>
<td>OSH criteria considered in buying new equipment</td>
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<tr>
<td><strong>WORKPLACE MONITORING</strong></td>
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<tr>
<td>Procedures in place for monitoring:</td>
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<tr>
<td>- Chemical hazards</td>
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<tr>
<td>- Physical hazards</td>
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<tr>
<td>- Biological hazards</td>
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<tr>
<td>Resources provided for monitoring</td>
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<tr>
<td>Records communicated and maintained</td>
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