Safe TO Work in Trinidad & Tobago (STOW-TT)



Safe TO Work

Sample Manual for Small & Micro Contractors

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FORWARD

As industry leaders in Trinidad and Tobago, the STOW Board and the participating Energy Companies are committed to working with service providers to promote health, safety and environmental (HSE) performance in the energy industry.

We recognise that the proliferation of HSE prequalification requirements within the energy sector can create challenges for the service providers, and so, we have agreed to adopt consistent HSE requirements to facilitate development of their HSE management program. This manual is be used as a guide in formulating your company's HSE management system. It can also be modified as needed to reflect a company's specific operations. Templates have been provided within the document to be used as examples in achieving that objective.

Additional information on developing a HSE program to satisfy the STOW requirement are available from the STOW Guidance Manual (section 5 & 6) which can be accessed through the Energy Chamber Website.

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USE OF THIS MANUAL DOES NOT GUARANTEE STOW CERTIFICATION

INTRODUCTION

Our company provides maintenance services to companies in the energy sector. It is our responsibility to provide a safe and healthy workplace for our employees, contractors and visitors. As a result, we have developed our Health, Safety and Environment Management System (HSEMS) which we have documented into our HSE Manual. We have implemented our HSEMS to help us develop a safe culture to prevent accidents on our facilities and worksites.

We are pleased to inform stakeholders that our management is committed to ensure the success of this HSEMS. Our employees also participate and support this initiative to ensure the success of this HSEMS. Some of the benefits of implementing this system are to ensure:

- Compliance to the OSH Act of Trinidad and Tobago
- Compliance to the EM Act of Trinidad and Tobago
- Certification to STOW-TT Minimum HSE Requirements
- Reduction of accidents

We will ensure that all employees will be aware of this HSEMS and will be trained in it. Contractors and visitors will also be trained in the relevant parts of this HSEMS. We will carry out regular checks using monitoring and measuring instruments which are identified in this HSEMS. We will communicate our HSEMS to our clients and customers and will partner with them to ensure that all work is carried out safely.

Our HSE Manual will be available in hard copies at the different departments/offices and electronically through our intranet system for employees.

As we invite you to follow our company's HSE rules, procedures and standards, feel free to bring to our attention any substandard acts and conditions. We will act upon these ASAP.

We encourage you to read and seek out information in our HSE manual.

1.0 HSE Management, Leadership and Accountability

1.1 Health, Safety and Environment Policy Statement

A HSE policy statement is a document which outlines the health, safety and environmental aims, objectives and commitment of the organisation and also the lines of responsibility. A HSE policy statement:

- Will satisfy legal requirements.
- Show managements' commitment to a safe working environment to employees and clients.

Figure 1.1 Sample HSE Policy Statement

It is the policy of "Company X" that the health and safety of all employees, contractors and visitors of this organisation shall be the main priority and the operations of this establishment shall be managed to reduce the impacts to the environments.

It is the responsibility of overall responsibility of Managing Director to ensure this HSE Policy is adhered to. It is the responsibility of [managers / supervisors] to establish, implement and maintain the HSE Policy. It is the responsibility of all employees to ensure compliance with the requirements of this policy and any applicable regulations.

HSE Objectives:

- Provide safe places of work and healthy working environments for employees and visitors.
- Reduce and in due course prevent injuries at work places.
- Promote health, safety and environmental protection as an integral part of the duties of management along with the education of all employees.
- Supply appropriate information, instruction and training.
- Comply with all laws and regulations covering occupational health and safety and the environment.
- Monitor the HSE policy continually.
- Develop and implement policies and procedures designed to promote safe working practices and environmental protection.
- Implement practices and procedures for the use, handling, storage and transportation of materials and substances and to eliminate discharges and omissions that could harm the environment.
- Establish an Emergency response procedure of natural disasters, fires, chemical spills, etc.

Based on the risk assessment done for "Company X" and maintenance services work sector, standards have been adopted for the company's operations. These standards can be viewed in attachment 2.1 Document Register.

1.2 Management Leadership and Accountability

The management of "Company X" is responsible for the organisation's overall HSE performance. Mangers are required to understand this manual and all relevant legislations and standards related to health, safety and the environment. Managers are required to sign off on a document familiarisation form (attachment 1.1) or a training attendance form (attachment 1.2) after these documents have been reviewed and understood. Management will be held accountable for any HSE breaches.

The roles and responsibility of management will be documented in their employment contracts, company organisational structure and in risk assessments. The managers and supervisors will be required to read and sign the document.

1.3 Health, Safety and Environment Implementation

"Company X" is committed to implementing and maintaining HSE initiatives. This will be accomplished by effective implementation of HSE policy, systems and standards including the financial (refer to attachment 1.3), personnel (refer to attachment 1.4) and time resources (refer to attachment 1.5) required to implement them.

1.4 Demonstration of Managements Leadership

Managers of "Company X" will demonstrate HSE leadership by:

- Conducting frequent site visits, inspections (refer to attachment 1.6) and reviews. This will be done on the premises of "Company X" and all other sites that the organisation performs work activities.
- Leading by example. This will be accomplished by adhering to organisational rules such as obeying personal protective equipment requirements and driving within the speed limit.
- Conducting / attending safety walks (refer to attachment 1.7) at locations where work is being performed.
- Making safety presentation.
- Promoting safety.
- Attending /organising accident prevention and investigation teams.

1.5 HSE Performance Plan

"Company X" will develop a HSE performance plan to measure and meet objectives set by the organisation. This will be accomplished by setting annual Key Performance Indicators (KPI's- refer to attachment 1.8). This KPI will be used to measure HSE performance against the set plan.

1.6 HSE Accountabilities and Responsibilities

Management has the ultimate responsibility for the HSE performance at "Company X". All employees are responsible for HSE performance of the company. This will be documented in but is not limited to employment contracts and job safety analysis. Responsibilities will also be communicated via internal memos, notices, pamphlets and email notifications. These roles and responsibilities will be reviewed annually to ensure it effectiveness.

Senior Management Roles and Responsibilities

- Ultimately responsible for implementation of all applicable HSE policies, legislation and standards.
- Integration of HSE in all aspects of the workplace.
- Provide adequate training for employees
- Periodic review of HSE policies, legislation and standards.
- Allocate resources such as financial, personnel and time for HSE management.
- Implement recommendations from incident / accident investigations.

Supervisors Roles and Responsibilities

- Responsible for HSE performance of employees under his / her care.
- Ensuring JSAs are completed for each job that it is required for.
- Ensuring all scheduled checks, inspections and calibrations are done for all required equipment.
- Promoting positive HSE culture.
- Investigating any accidents, incidents and near misses as reported to him /her.
- Ensuring all employees under his / her charge has the relevant training for their job task.

Employees Roles and Responsibilities

- Aware of and complying with all applicable laws, standards and company policies, procedures and rules relevant for their job responsibilities.
- Cooperating with management and supervisors on positive HSE performance and any incident investigations.
- Working safely so as to not negatively affect their selves, others and the environment.
- Reporting all accident, incident and near misses immediately to their supervisors.
- Not under the influence of alcohol, illegal and prescription drugs. This can impair all functions such as reaction time, alertness coordination, judgement and safety.
- Participating in JSAs, safety meetings and tool box talks.

1.7 Systems in place to influence positive safety culture.

"Company X" will engage in various activities to improve and promote positive HSE culture within the organisation. This organisation expects all employees to cooperate with all health, safety, environmental and welfare matters, take responsibility for their own health and safety and that of others who may be affected by their actions.

In particular we expect everyone to:

- Cooperate with the organisation and support its policy and systems on health and safety.
- Bring to the attention of managers and supervisors any situations or procedures that may lead to injury or ill health.
- Report all accidents, incidents, near misses and instances of work related ill-health.
- Use equipment, articles and substances in a safe and responsible way.
- Not to undertake any activity that may pose a danger to themselves or any other person.
- Maintain good housekeeping in the workplace.
- Undertake health and safety training that is appropriate to their work activities.

Employees will be recognised for contributions toward achieving set HSE goals and targets. This will be accomplished by but is not limited to HSE recognition, awards, notifications to entire staff and financial compensation. The organisation will also have competitions (inclusive of quarterly slogan competition) throughout the year and will culminate with a week full of activities at the end of the year to review of the HSE Performance. Employees will also be recognised for their HSE performance monthly. Records of all awardees will be documented and saved.

1.8 General HSE Rules

"Company X" has other mandatory safety rules in addition to those outlined earlier. These rules will be communicated to employees at the beginning of employment at "Company X" and will be distributed via booklet or pamphlet. These rules will also be communicated via posters and notices on company notice board. The safety rules apply to all employees including management, supervisors, employees and contracted workers.

These rules are:

- Ensure compliance with all safety rules of "Company X" and any client site visited.
- Inspect all tool, equipment and job sites prior to the start of any job.
- Participate in safety meeting, walks and toolbox talks when required.
- Horseplay is prohibited.
- Being under the influence of a substance is not allowed.
- Report any accidents and incidents immediately to supervisor.
- Ensuring safe work practices are followed.
- Following local traffic laws.
- Use personal protective equipment provided for safe performance of work.

Any employee found to be non-compliant will be subjected to the relevant disciplinary action. This includes but is not limited to:

- Suspension.
- Deduction of part of their salary.
- Reduced authority
- Termination.

The following step will be followed to determine the final action to be taken:

- 1. First violation verbal warning and review of training.
- 2. Second violation written warning.
- 3. Third violation- Suspension
- 4. Forth violation Termination

The type of violation will determine the extent of the disciplinary action but management reserves the right to make the final decision.

1.9 Refusal to Work

All employees have the right to refuse to work or stop work if the conditions they have to work under are unsafe. This is described in the Occupational Safety and Health Act of Trinidad and Tobago 2004 as amended 2006.

Employees must not use this as an excuse to get out of work. Employees must provide valid reasons and evidence of unsafe conditions. An employee cannot refuse to work if the task to be done will result in injury to other personnel and this is the normal condition of work.

Procedure for refusing to work:

- 1. The employee must immediately report any unsafe conditions to their supervisor.
- 2. Do not leave the workplace, but move away from hazard.
- 3. Supervisor must investigate the report.
- 4. If claim is substantial, all efforts must be made to remedy the situation.
- 5. If issue cannot be corrected in a timely fashion other work must be designated to worker/s.
- 6. If the outcome derived from the supervisor or management is not satisfactory a report must be made to the relevant authority. This is the OSH Agency TT.
- 7. Request an OSH Inspector to visit the workplace.
- 8. If step six is unsatisfactory the issue can be raised in Industrial Court.

(Refer to the Occupational Safety and Health Act of Trinidad and Tobago 2004 as amended 2006, section 15 to the steps outlining actions that can be taken.)

If employee refuses work and the job is reassigned, the employer must inform the new employee of the refusal made.

1.10 HSE Leadership Forums with Customers

"Company X" is committed to providing safe and excellent work performance for all our clients and customers. Senior management will engage in forums with the clients / customers to discuss the HSE performance of "Company X". This will be done twice yearly for customers with long term contracts and after the completion of short term contracts. Items discussed will include:

- HSE performance of representatives from "Company X".
- Suggestions for improvements.
- How "Company X" will improve for future.

Meeting would be documented in the form of minutes to ensure proper record making. "Company X" will agree and adhere to its client's method statement and JSAs.

1.11 Contractor Assessments.

All contractors and sub-contractors working for "Company X" must satisfy the following categories: HSE, legal, financial, work experience and competent staff. The management of "Company X" will review contractor and will make the overall approvals for work with the company. All contractors and their employees shall comply with the "Company X" HSE Policy and Procedures. Contractors shall also show compliance with the Occupational, Safety and Health Act of Trinidad and Tobago 2004 as amended 2006. Contractors must undergo a site induction for "Company X" work site and any work site required to work in and must be in possession of a PLEA Passport.

Contractors must provide:

- Evidence of safe work practices which includes but is not limited to a documented HSE policy.
- Proof of training for employees, this can be signed training forms and certificates.
- Document of resources allocated to HSE performance.

Attachment 1.1: Template of Document Familiarization Form

Name: _____

Job Title: _____

Name of Training:

Facilitator:

Date: _____

I have read the HSE Policy Training. I understand and accept my responsibilities under this policy.

Signature

Date

Attachment 1.2: Training Attendance Sheet Template

Name of Training: _____

Facilitator: _____

Date: _____

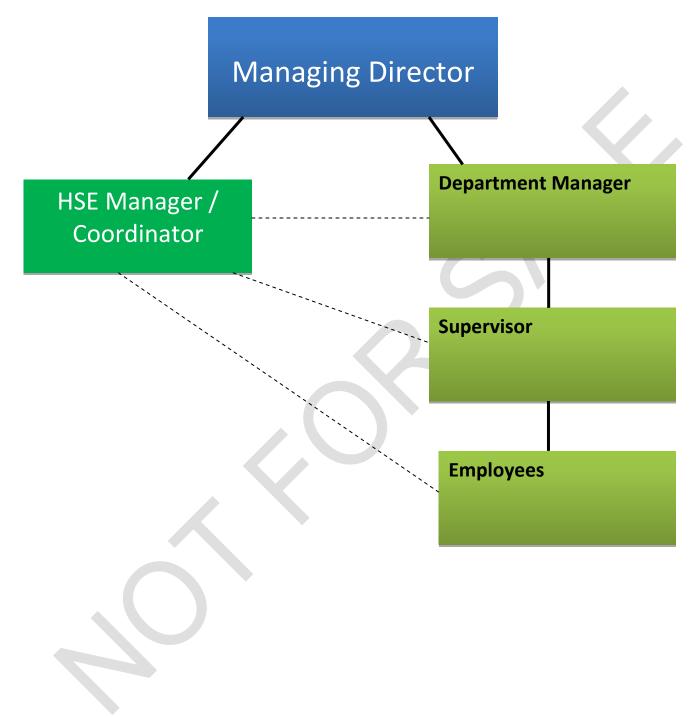
NAME	SIGNATURE

Attachment 1.3: Simple Financial Budget Template

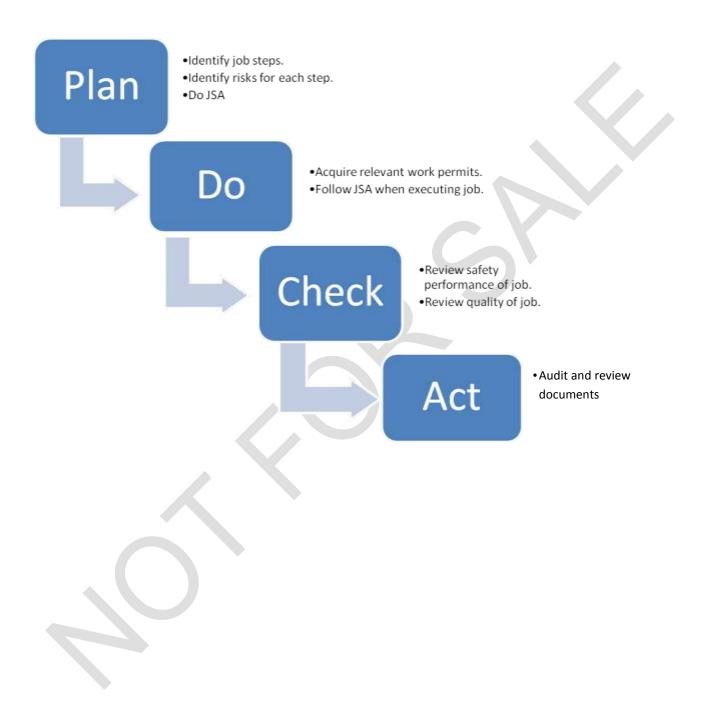
HSE Expenditure

Cost Category	Budgeted Cost	Actual Cost
Personal Protective Equipment		
• Safety Glasses		
Safety Helmet		
Safety Shoes		
• Coveralls		
• Gloves		
Safety Equipment		
• Fire Extinguishers		
Hose Reel Cabinets	6	
Training		
Training on TT OSH Act		
Scaffolding Inspection		
Audits		
STOW Implementation		
Memberships and Subscriptions		
• The Energy Chamber of Trinidad and Tobago		

Attachment 1.4: Template of Organisational Chart of HSE Duties



Attachment 1.5: Template of Time Allocation for HSE Activities



Attachment 1.6: Equipment Inspection Template

EQUIPMENT INSPECTION

Equipment Name:	 Equipment
1 1	

Location:

	Equipment	Number:	_
--	-----------	---------	---

Date:

	Yes	No	Action	No Action
			Required	Required
Electrical				
Is there evidence of fraying on electrical cords?				
Ladders, Platforms and Stairs				
Do stairs have handrails on them?				
Are fixed ladders properly secured against movement?				
Personal Protective Equipment				
Are there any special PPE requirements for the equipment or				
operation?				
Has appropriate PPE been provided to employees?			×	
Ergonomics				
Does operation of the equipment require operators to engage				
in highly repetitive hand, wrist, arm, and finger movements				
or exertions? Is frequent bending, twisting, and reaching required?				
Emergency Procedures				
Have employees been trained in emergency shut-down				
procedures?				
Does the placement of the equipment present any evacuation				
hazards in the event of a serious equipment malfunction?				
Fire Hazards				
Does the equipment present any inherent fire hazards such as				
open flames, flammable liquids, solids and gases, etc.?				
Are these hazards properly controlled by safeguards built				
into the equipment or provided outside, over, and around the				
equipment?				

RECOMMENDATIONS:

Signature

Date

Attachment 1.7: Template of a Site Visit Form

ANNUAL / QUARTERLY / MONTHLY SAFETY INSPECTION

LOCATION:

_____ DATE: __

ATTENDEES:

ISSUES IDENTIFIED:

No.	Observations	Consequence	Action to be taken	Date Due

Signature

Date

Attachment 1.8: Simple KPI Template

									Actua	1					
Key Performance Indicators	Unit	Monthly Target	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	YTD
Health and Safety															
Number of															
First Aid	1														
Cases Number of	each	<3													
Restricted workday cases	h	0													
(RWC) Number of	each	0													
Medical treatment															
cases (MTC) Number of	each	0													
Loss time injury (LTI)	each	0													
Number of															
Near misses	each	10													
Number of safety															
observations	each	20													
Number of															
Safety walks	each	2													
HSE Training	hour s /														
	empl														
	oyee	4													
Number of sick leave	days /														
taken	empl oyee	1													
Availability of															
safety equipment	%	100													
Environmental	70	100													
Recyclable															
paper (monthly)	bag	10													
Ink & Toner	Ŭ														
Cartridges (quarterly)	each	10													

<u>KPI 2013</u>

Attachment 1.9: Work Authorisa	ation Form Templat	<u>e</u>	
Type of Work: Hot Work	Safe Work	Excavation	Confined Space
Description of Job:			
Location:			
Date:	Time Issued:	Va	lidity to:
Issued to:			
Special Precautions:			
Required Safety Equipment:			
PPE Requirements:			
Authorisation:			
Job Supervisor:Block Letter			Cionatura
			Signature
Department Supervisor:BI	ock Letters		Signature
Department Manager			
(Special circumstances):	Block Letters		Signature

2.0 Legal Requirements and Document Control

2.1 Conformance with legal requirements

"Company X" shall show compliance with the Trinidad and Tobago Occupational Safety and Health Act (TTOSHA) 2004 as amended 2006 and all other related Health, Safety and Environment Legislation of Trinidad and Tobago. The organisation will conduct gap analyses on the applicable legislation (OSH Act of Trinidad and Tobago 2004 as amended 2006; the Environmental Management Act 2000). The organisation shall have a documented process in place for the identification of all legal requirements including current and pending legislation; standards, regulations and guidance (refer to attachment 2.1).

The organisation shall carry out continuous research to determine any legislation, standards and regulations that are relevant to the activities changes by the company. Regular audits will be conducted to ensure compliance against all legal requirements and company policy.

2.1.1 Document Management System

Documentation is created to record information that is required to show conformance with legislation, regulations, standards, guidance, audits and reviews. Documents such as procedures and work instructions are also required to achieve greater operational control.

The purpose of this procedure is to ensure that only current versions of the document are in use at the organisation.

It is the responsibility of senior management to ensure this policy is implemented and maintained.

Steps to a document management system include:

- 1. A master list or document register must be maintained by a designated person and must be available to all employees.
- 2. All document vital to the operations of the organisation shall be controlled and be given a reference number. All controlled documentation shall contain the following :
 - A creation date;
 - A revision date and number;
 - A unique reference number,
 - A title describing the document.

- 3. Only the senior manager or his designate shall have write access to make changes to controlled documents. Any employee can recommend a change. A Document Change form should be used to request changes. Refer Attachment 2.2.
- 4. Controlled hard copies must have a stamp or some indication that the document is original. Uncontrolled documents must have some indication such as water make that the document is uncontrolled.
- 5. Obsolete document must be removed from use and replaced with the current version. These obsolete documents must be destroyed.

2.2 HSE Documents

"Company X" shall maintain a register of the HSE related documentation deemed required or are legally required to have (Attachment 2.1). This document will be readily available upon request.

2.3 HSE Records

"Company X" shall have a documented system that has identified the HSE records that are required to be kept, the method, location and length of time the documents should be kept. Records will be kept for five (5) years.

Attachment 2.1: Document Register

Health, Safety, Environment and Quality Document Register	Revision No.
First Issued: (date)	Revision Date:

Category	Document No.	Document Name	Issuing Body	First Issue:	Revision No.	Revision Date:	Location	Method stored	Length of Time to be Reviewed / Kept
Internal									
Policy	HSE-1	HSE Policy Statement	Compa ny name	2/18/2011	1	2/22/201 2	Administration	Soft & Hard Copies	Annually
			nume				Supervisors office	Soft & Hard Copies	
							Managing Directors Office	Soft & Hard Copies	
							Employee common area	Hard copy	
Policy	HSE-2	Emergency Response	Compa ny name	2/18/2011	1	2/22/201 2	Administration	Soft & Hard Copies	Annually
							Supervisors office	Soft & Hard Copies	
							Managing Directors Office	Soft & Hard Copies	
							Employee common area	Hard copy	
Policy	HSE-3	Accident and Incident	Compa ny name	2/18/2011	1	2/22/201 2	Administration	Soft & Hard Copies	Annually
		Report Procedure	name				Supervisors office	Soft & Hard Copies	
							Managing Directors Office	Soft & Hard Copies	
							Employee common area	Hard copy	
Policy	HSE-4	Work Procedures	Compa ny name	2/18/2011	1	2/22/201 2	Administration	Soft & Hard Copies	Annually
		a) Taking water sample					Supervisors office	Soft & Hard Copies	
		b) Changing a butterfly					Managing Directors	Soft & Hard	
		valve c) Welding					Office Employee common	Copies	
Reports	HSE-5	procedure Accident	Compa	2/18/2011	1	2/22/201	area	Hard Copy	3 years
		and Incident Reports and Investigatio	ny name			2	Managing Directors Office	Soft & Hard Copies	
		n.					Administration	Soft & Hard Copies	1

Attachment 2.1: Document Register (cont.)

Reports	HSE-6	Safety equipment checks	Compa ny name	2/18/2011	1	2/22/201 2	Supervisors office	Soft & Hard Copies	Monthly
							Managing Directors Office	Soft & Hard Copies	
Reports	HSE-7	Training Records	Compa ny name	2/18/2011	1	2/22/201 2	Managing Directors Office	Soft & Hard Copies	As needed
							Administration	Soft & Hard Copies	
Reports	HSE-8	Medical Records	Compa ny name	2/18/2011	1	2/22/201 2	Managing Directors Office	Soft & Hard Copies	
							Administration	Soft & Hard Copies	As needed
Forms	HSE-9	Tool box Talks	Compa ny name	2/18/2011	1	2/22/201 2	Administration	Soft & Hard Copies	As needed
							Supervisors office	Soft & Hard Copies	-
							Employee common area	Hard copy	
Forms	HSE-10	JSA Template	Compa ny name	2/18/2011	1	2/22/201 2	Administration	Soft & Hard Copies	As needed
			name				Supervisors office Employee common	Soft & Hard Copies	-
Forms	HSE-11	Training	Compa	2/19/2011	2	2/23/201	area	Hard copy	As needed
FOIIIIS	пзЕ-11	Attendance Form	ny name	2/19/2011	2	2/23/201	Administration	Soft & Hard Copies	As needed
							Supervisors office	Soft & Hard Copies	-
		Equipment Checklist					Employee common area	Hard copy	
External					_				
Occupatio nal Health and Safety		Occupation al Health and Safety	Occupa tional Safety	2004		2006 (Amend ed)	Administration	Soft & Hard Copies	When Issuing body Revises
and Surety		Act Trinidad	and Health				Supervisors office	Soft & Hard Copies	_
		and Tobago	Authori ty of Trinida				Managing Directors Office	Soft & Hard Copies	_
			d and Tobago				Employee common area	Hard copy	
Occupatio nal Health and Safety		The Lifting Operations and Lifting	Occupa tional Safety	2009			Administration	Soft & Hard Copies	When Issuing body Revises
		Equipment Regulations	and Health Authori				Supervisors office	Soft & Hard Copies	
			ty of Trinida d and				Managing Directors Office	Soft & Hard Copies	
	Ŧ		d and Tobago				Employee common area	Hard copy	

Attachment 2.1: Document Register (cont.)

Occupatio	1911	Manlifts	Occupa	1974	6	2007		Soft & Hard	When Issuing
nal Health and Safety			tional Safety				Administration	Copies	body Revises
5			and Health				Supervisors office	Soft & Hard Copies	
			Admini stration				Managing Directors	Soft & Hard	
			US				Office Employee common	Copies	
			-		-		area	Hard copy	
Occupatio nal Health and Safety	1911	Occupation al Noise Exposure	Occupa tional Safety	1974	9	2008	Administration	Soft & Hard Copies	When Issuing body Revises
			and Health					Soft & Hard	
			Admini				Supervisors office	Copies	
			stration US				Managing Directors Office	Soft & Hard Copies	
							Employee common		
Occupatio	1911	Non-	Occupa	1996	0		area	Hard copy Soft & Hard	When Issuing
nal Health and Safety		ionizing radiation	tional Safety				Administration	Copies	body Revises
and Safety		Tadiation	and Health				Supervisors office	Soft & Hard Copies	
			Admini stration US				Managing Directors Office	Soft & Hard Copies	
							Employee common area	Hard copy	
Occupatio nal Health and Safety	1910	Eye and Face Protection	Occupa tional Safety	1994	4	2009	Administration	Soft & Hard Copies	When Issuing body Revises
			and Health					Soft & Hard	
			Admini				Supervisors office	Copies	
			stration US				Managing Directors Office	Soft & Hard Copies	
							Employee common		
Occupatio nal Health	1910	Respiratory Protection	Occupa tional	1998	5	2011	area Administration	Hard copy Soft & Hard Copies	When Issuing body Revises
and Safety			Safety and Health				Supervisors office	Soft & Hard Copies	
			Admini stration				Managing Directors Office	Soft & Hard Copies	
			US				Employee common area	Hard copy	
Occupatio nal Health and Safety	1910	Head Protection	Occupa tional Safety	1994	3	2009	Administration	Soft & Hard Copies	When Issuing body Revises
and Safety			and Health				Supervisors office	Soft & Hard Copies	
			Admini stration US				Managing Directors Office	Soft & Hard Copies	
			2.2				Employee common area	Hard copy	

Attachment 2.1: Document Register (cont.)

Occupatio nal Health	1910	Foot Protection	Occupa tional	1994	4	2009	Administration	Soft & Hard Copies	When Issuing body Revises
and Safety			Safety and Health				Supervisors office	Soft & Hard Copies	
			Admini stration US				Managing Directors Office	Soft & Hard Copies	
			05				Employee common area	Hard copy	
Occupatio nal Health and Safety	1910	Hand Protection	Occupa tional Safety	1994	0		Administration	Soft & Hard Copies	When Issuing body Revises
, ,			and Health Admini				Supervisors office	Soft & Hard Copies	
			stration US				Managing Directors Office	Soft & Hard Copies	
							Employee common area	Hard copy	
Occupatio nal Health and Safety	1910	Hazard Communic ation	Occupa tional Safety and	1994	2	1996	Administration	Soft & Hard Copies	When Issuing body Revises
			Health Admini				Supervisors office	Soft & Hard Copies	
			stration US				Managing Directors Office	Soft & Hard Copies	
							Employee common area	Hard copy	
Occupatio nal Health and Safety	3071	Job Hazard Analysis 3071	Occupa tional Safety	2002			Administration	Soft & Hard Copies	When Issuing body Revises
			and Health				Supervisors office	Soft & Hard Copies	
			Admini stration US				Managing Directors Office	Soft & Hard Copies	
							Employee common area	Hard copy	
Environm ent		Water Pollution Rules	Enviro nmenta 1	2001			Administration		When Issuing body Revises
			Manag ement					Soft & Hard Copies	
			Authori ty				Supervisors office	Soft & Hard Copies	
							Managing Directors Office	Soft & Hard Copies	
							Employee common area	Hard copy	
		Noise Pollution Rules	Enviro nmenta 1						
			Manag ement				Administration	Soft & Hard Copies	
			Authori ty				Supervisors office	Soft & Hard Copies	
							Managing Directors Office	Soft & Hard Copies	
							Employee common area	Hard copy	

Attachment 2.2: Document Change Request Form Template

DOCUMENT CHANGE REQUEST FORM

Document to be changed:	
Proposed Change:	
Other Documents Affected by Change:	
Reason for Change:	
Requested By:	Date:
Kequested by:	Date:
Approved By:	Date:
FOR OFFICIAL USE ONLY	
Changes Acceptable: Yes No	
Changes Made: Yes No	

3.0 Risk and Change Management

3.1 HSE Risk Management Process

"Company X" shall create and maintain a documented process for the identification of critical activities. This includes but is not limited to:

- Tool box talks (attachment 3.1)
- Job Safety Analysis which must be reviewed daily where applicable (attachment 3.2)
- Risk Assessment (which will be reviewed annually)
- Safe Work Procedure (attachment 3.3)
- Risk Register for the major activities. This will include but is not limited to the description, hazards and control measures (attachment 3.4)

3.2 Competence of personnel doing the risk assessment

"Company X" shall employ qualified persons to undertake risk assessment. The relevant personnel must be:

- i. Competent in understanding and following the risk assessment process to be used.
- *ii.* Display a broad enough understanding and knowledge to ensure reasonable hazards will be identified and that the need for control measures will be properly considered.
- iii. Ensure that any control measures in place are reasonable and effective.

Competent persons will have specialized risk management/assessment training and have at least 3 years' experience in facilitating such assessments. Subject specialists will be used where required expertise is needed.

3.2.1 Performing a Risk Assessment

Risk assessments will be completed for all the major activities of "Company X". Where "Company X" operates on shared site comprising of multiple companies, "Company X" will participate and signed off along with the other companies on the risk assessments process to be used. If "Company X" is the site controller, a specialist will be employed to assist and guide the risk assessment.

There are six simple steps that can be used to assess risks in the work place. These are:

1. Identify the hazards. A hazard is anything that may cause harm, such as chemicals, electricity, working from ladders, an open drawer etc. To accomplish this step, one can walk around the

workplace and look for what can cause harm. Consolations can also be held with employees, check manufactures labels and conduct research on the hazards that exist in the work place.

- 2. Decide who may be harmed by the hazards and how. List the various groups that can be affected by the hazard, for example, young persons, welders etc.
- 3. Determine the severity of the risk. Severity is how bad the outcome of the hazard.is and can be measured by the type of injury; loss of life; dollars lost; loss of public trust (and customers); numbers of persons affected by foodborne illnesses, etc. Severity can range from
 - **Minor** (e.g., superficial injuries; minor cuts and bruises; eye irritation from dust; nuisance and irritation; ill-health leading to temporary discomfort)
 - **Serious** (e.g., lacerations; burns; concussion; serious sprains; minor fractures; deafness; dermatitis; asthma; work-related upper limb disorders; ill-health)
 - **Major** (e.g., amputations; major fractures; poisonings; multiple injuries; fatal injuries; occupational cancer; other severely life shortening diseases; acute fatal diseases).
- 4. Determine the likelihood of the occurrence of identified hazards. Likelihood is the state of being likely or probable. This ranges from events that are
 - Very Likely Typically experienced at least once every six months by an individual.
 - Likely Typically experienced once every five years by an individual.
 - Unlikely Typically experienced once during the working lifetime of an individual.
- 5. Evaluate risks and decide on precautions. A simple 3 x 3 risk matrix can be used (figure 3.1). The best action to deal with the hazards identified can be determined by the level noted in the matrix.
 - Simple administrative controls such as change in work procedure and the use of additional PPE can be used to manage low (yellow) levels of risk.
 - For medium (orange) levels of risk consideration should be as to whether the risks can be lowered, where applicable, preferably to an acceptable level.

- For high risk levels (red) efforts should be made to reduce the risk. The work activity should be halted until risk controls are implemented that reduces the risk so that it is no longer very high. If it is not possible to reduce the risk, the work should remain prohibited. A specific time period should be set to implement corrective measures.
- 6. Review assessment and update where necessary. This must be done on a continual basis so as to improve HSE within your organisation.

To determine the criticality of the risks posed by the hazards a simple risk matrix can be used.

Figure 3.1: Simple qualitative risk matrix that can be used to determine criticality of activities.

		Severity of Risk					
		Minor	Serious	Major			
Likelihood of Occurrence	Unlikely	Low	Low	Medium			
lihod	Likely	Low	Medium	High			
Like Occi	Very Likely	Medium	High	High			

3.3 Risk Register.

"Company X" shall document all risk assessments onto a risk register. Risk assessments will be reviewed and up-dated once every 12 months.

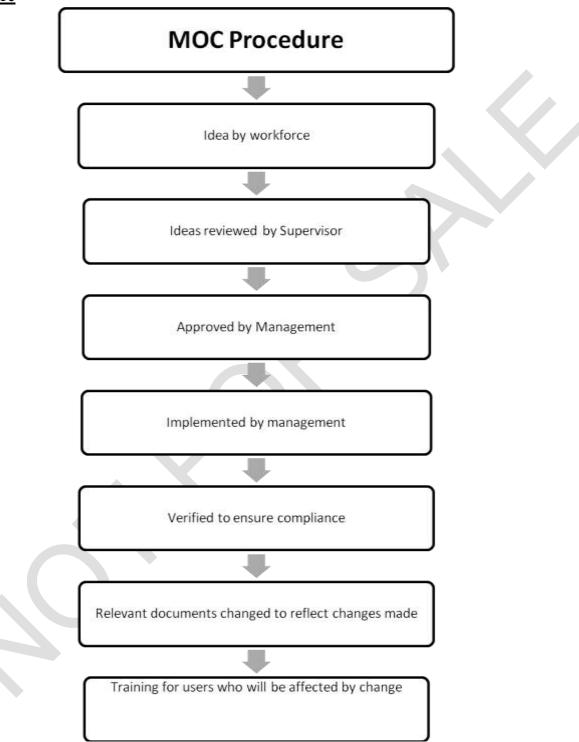
3.4 Change Management Process

"Company X" shall create and maintain a documented change management process using a controlled document system, identifying people, process, equipment and duration along with an effective relevant organizational communication method.

Any employee can recommend a change. This initiate the change a MOC form must be completed and sent through the line for approvals. Refer to attachment 3.5.

Figure 3.2 Management of Change





Attachment 3.1: Tool Box Talk Template

Tool Box Talk

A tool box talk is a short 5 or 10 minute talk on a specific health and safety topic. It should be conducted before performing a job. The meeting should cover but is not limited to the job steps, risk assessment and emergency response. The facilitator of the meeting should be the job supervisor. All participants of the meeting should sign the tool box talk form.

TOOL BOX TALK FORM

Date:	Job:
Facilitator:	Meeting Location:

Items Discussed:

Item	Yes	No	NA	Comments
Safety Topic				
Job Steps				
Hazards Associated with job				
Emergency Response				
Quality of Workmanship				
Housekeeping				
Personal Protective Equipment				
Other				

Attendees:

Name (Block Letters)	Signature

Facilitator's Signature:

Attachment 3.2: JSA Template

Job Safety Analysis

JSA Reference Number	Page 1 of 1	
Activity		
To Change light bulbs in the building		
Location	Date	
Administration building	2012/02/22	
JSA Performed By	Signature	
John Ali	John Ali	
Christopher Manuel	C.Manuel	1

Perso	onal Protective Equip	• 1	GlovesHelmetSafety Glasses		
Spec	ial Precautions				
NO	JOB STEPS	EXISTING OR POTENTIAL HAZARDS		CONTROL MEASURES	ACTION BY
1	Mobilizing equipment at the base of the light.	Pinch points Tripping		Gloved to be worn Store equipment neatly.	Employees
2	De-energize light	Circuit remains energized or is accidentally energized while work is in progress causing: 2.1 Electrical Shock 2.2 Fire 2.3 Fall due to electric shock		Insulating gloves Fire extinguisher on site. Other personnel to be at job site	Supervisor and employees
3	Position ladder at base of light.	Ladder may fall on personnel		Ensure ladder is suited for job, i.e. tall enough, not metal.	Supervisor and employees
4	Ascend ladder	Fall from height		Employ proper ladder use measures, i.e. do not over reach or step above designated rungs.	Employee

Attachment 3.2: JSA Template (cont.)

NO	JOB STEPS	EXISTING OR POTENTIAL HAZARDS	CONTROL MEASURES	ACTION BY
3	Remove old bulb and install new bulb	Fumble, crush or drop bulb Fall from height	Ensure secure footing and bulb is secured properly in the hand. Someone at the base holding the ladder securely.	Employee
4	Descending the ladder	Fall from height	Someone at the base holding the ladder securely. Exercise caution	Employee

Verified by:

Name:	

Position: _____

Date: _____

Attachment 3.3: Safe Work Procedure Template

Safe Work Procedure

Job Activity: Changing Tires on Vehicle

Requested by:

Job Steps:

- Place vehicle in park and engage hand brake.
- Chuck wheels to prevent roll back.
- Roll jack under vehicle.
- Lift vehicle.
- Remove bolts on wheel.
- Change tire.
- Replace wheel.
- Lower vehicle
- Remove jack
- Remove chucks

Approved by:

Signature: _____

Date: _____

Job Completion

Inspected by: _		
mopeetea ej. =		T

Okay to replace in service:	Yes	No
-----------------------------	-----	----

Attachment 3.4: Risk Register Template

No	RR Name	RR Number	Description	Team members	Date finish	Revise date	Location
1	Pump Repair in Shop	PRS-01	Risk and hazards on repairs to pump in workshop	Safety Officer, Supervisor, technician, Fitter, Mechanic	2012/01/13	2013/01/12	Safety, Shop
2	Pump Repair at Worksite	PRW-02	Risk and hazards on repairs to pump at Worksite	Safety Officer, Supervisor, technician, Fitter, Mechanic	2012/01/13	2013/01/12	Safety, Worksite
3	Pump Installation at Worksite	PIW-03	Risk and hazards to install pump on worksite	Safety Officer, Supervisor, technician, Fitter, Mechanic	2012/01/13	2013/01/12	Safety, Worksite
4	Compressor Repair in Shop	CRS-04	Risk and hazards on repairs to compressor in workshop	Safety Officer, Supervisor, technician, Fitter, Mechanic	2012/01/13	2013/01/12	Safety, Shop
5	Compressor Repair at Worksite	CRW-05	Risk and hazards on repairs to compressor at Worksite	Safety Officer, Supervisor, technician, Fitter, Mechanic	2012/01/13	2013/01/12	Safety, Worksite
6	Compressor Installation at Worksite	CIW-06	Risk and hazards to install compressor on worksite	Safety Officer, Supervisor, technician, Fitter, Mechanic	2012/01/13	2013/01/12	Safety, Worksite

Attachment 3.5: MOC Template

Management of Change

Change Requested: _____

Reason for Change: _____

MOC Checklist

	Yes	No
Site evaluation		
Equipment selection specifications		
Material selection specifications		
Codes		
Welding/testing procedures		
Pressure testing procedures		
High/low temperature protection		
Electrical system		
Process and/or equipment isolation		
Fire protection		
Drawing updating		
Warning signs, warning devices		
Environmental emissions/ Permits		
Hazardous waste		
Product or chemical spill control measures		
Access and Egress from buildings, enclosures, equipment		
Tripping hazards		
Equipment lockout capability		
Emergency procedure		
Operating procedure		
Contractors		
Personal protection equipment		
Spare Parts		
Workplace Risk Assessment		

Requested by:

Name: ____

Signature:

Date: _____

Approved By:

Name: _____

Signature: _____

Date: _____

4.0 Planning, Goals and Targets

4.1 Business Plan

Figure 4.1 Sample Business Plan

"Company X" has developed its 2012 business plan which includes its vision, mission, goals, and strategies to achieve its goals. The company plans to improve its profit by 25% by increasing its production and its clientele in the energy sector. In order to accomplish this, we shall attain STOW -TT Minimum HSE requirements certification by June 2012. We shall engage an HSE professional to guide this process to realize this goal. As part of the business planning process, senior management will consider the impact that existing and new business will have on HSE performance.

When carrying out the planning process the following will be considered:

- Major goals and targets will be identified.
- Required resources such as personnel, time and money will be considered.
- Identification of the achievable objectives.

4.2 HSE Goals and Targets

Goals and targets set by "Company X" will be smart, measurable, achievable and realistic and can be accomplished in a specified time period.

Examples of "Company X" HSE Goals and Targets

- 1. To engage HSE Professional by 2012 January 15.
- 2. To conduct its annual risk assessment by 2012 February 15.
- 3. To develop company's training matrix by 2012 February 28.
- 4. To Develop policies and procedures by 2012 March 30.
- 5. To communicate HSE goals and targets to 100% of employees by 2012 March 30.
- 6. To decrease incident / accidents by 15% at the end of 2012.

To ensure that the goals and targets are met, management of "Company X" will review the HSE performance quarterly. Findings will be communicated to employees as required.

4.3 HSE Plan

The HSE Plan should consist of the following:

- Description of plan
- Purpose of plan
- Who makes the plan work with their roles and responsibilities
- What are the components of the plan
- How the plan is executed.

Organisational Chart of the individuals or groups to make the HSE plan works.

Roles and Responsibilities of key personnel required to make the HSE plan work (refer to section 1.6).

HSE Coordinator

- Developing the plan
- Auditing the performance of the plan
- Making recommendations to management
- Ensuring recommendations are implemented and effective.

Figure 4.2 Sample HSE Plan

Our company is committed to provide a safe and healthy working environment for its employees and also to identify risks/hazards and prevent accidents from occurring. In order to satisfy this we have developed an HSE plan which encompassed the following:

- Installation of an HSE Committee
- Conduct Company's Risk assessment
- Carry out Job safety Analysis for all jobs/activities
- Develop HSE Policies and Procedures
- Train employees in HSE relevant HSE courses
- Hold Daily Tool Meetings
- Hold Weekly Safety Meetings
- Carry out HSE Inspections
- Carry out HSE Audits

- Measure Incident Statistics
- Hold Quarterly Management Review Meetings

The information gathered from the listing above is compiled by the Safety Officer, analyse by the HSE Committee and presented to management on a monthly basis.

4.4 **Procedure for job activities**

Procedures for existing work activities are available and new procedures shall be created for any new work activity. Refer to attachment 4.1 for the template of a work procedure.

4.5 Critical Personnel

The company has to identify what positions are critical to its operation. Also to prevent multiple critical positions being held by newly promoted or newly hired personnel.

Resumes and training records of all key personnel within "Company X" will be held on file. This is to ensure that the key personnel are fully competent in their respective fields and HSE performance. Background checks will be done for personnel (refer to section 6.2).

4.6 Method Statement

The operations of "Company X" are generally routine. For any critical and non-routine jobs a method statement will be created. Method statements (refer to attachment 4.2) will include:

- The name of the originator and the date it was originated.
- The names of the person/s responsible for the operation and compliance of the Method Statement.
- Names of key personnel responsible for the critical activity.
- The training requirements of personnel whose functions require proof of competence (forklift operator, welder, etc.)
- Emergency response details. This would include safe access and egress routes, emergency equipment, etc. the method statement will also detail how this is maintained.
- Details of the equipment used to perform the operation. This would include the weight, size power rating and the certification of the equipment .

- Identity of the materials to be used, the method of storage, transportation and security for the material.
- Detailed sequence of work steps including the risk assessment and any risk control measure employed or to be employed.
- Detailed personal protective equipment to be utilised.
- Environmental limitations such as wind speed, rain and temperature.
- Measures to protect third parties not involved in the operation.
- Method to authorise variation to method statement.

Attachment 4.1: Work Procedure Template

Work Procedure

Floor Care: Vinyl-VCT Floor Waxing-Loop Mop Method

Purpose: To apply a floor wax to all vinyl floors within the facility.

Procedure:

- 1. Sweep the floor thoroughly to remove dust, dirt and debris.
- 2. Place three "Wet Floor" signs approximately eight feet apart along one half of the floor.
- 3. Spray the mop head with water to dampen.
- 4. Line bucket with plastic bags then pour required amount of wax into the bucket for area application/Ready fast track application system if available.
- 5. Saturate mop with wax.
- 6. Wring out bottom half of mop tightly, so that sealer will not drip.
- 7. Apply a thin coat of wax over the entire area using a "figure eight" motion. Avoid baseboards and walls.
- 8. Let dry.
- 9. Repeat steps, as needed, to add thin coats. No more than 4 coats.
- 10. Self-inspect work.
- 11. Properly discard any unused wax. Tie wax and mop head securely in plastic bag ready for next application.
- 12. Clean equipment and store in an orderly fashion.

Attachment 4.2: Method Statement Template

Project	
Job Site Location	
Client's Name	
Client's Rep	Contact Number
Description of	Safely access and carry out work to replace roof mounted of the chiller
Activity	from 5th floor roof (approx. 35 metres above grade).
	Implementation and Control of Risk
Hazardous Task	Method of Control
Construction Site	PPE including hard helmet, florescent vest, safety glasses and safety boots
	shall be worn at all times.
Roof Access	Access to the roof will be via a suitably secured stepladder of the correct
	length for the task.
Landing areas	Landing areas shall be cordoned off, using steel 1.8 meter barriers,
	warning barriers, warning tape, and warning notices. Refer attached to
	drawing.
Lighting	Electric lead lights shall illuminate access and work areas.
Working at height	Certified anchors, personnel fall arrestors and harness shall be used by all
	employees working at roof level.
Hot	PPE including eye protection, gloves and apron shall be used by
Work/Abrasive	employees. Suitable dry powder fire extinguisher(s) will be adjacent to the
wheels	working area. Employees shall be relevantly certified to use equipment.
Scaffolding	All scaffolding shall be certified, and inspection form securely fixed, and

	held within weatherproof transparent frame.
Removal of	Landing area to be cleared and supervised. The existing chiller will be
Chiller	carefully lowered from the roof, using crane, securely strapped with the
	certified rope cable system.
Chiller Hoisting	After clearance of personnel and debris from the landing area, the new
	chiller shall be securing fixed, hoisting from ground floor to roof safely
	secured to prevent spinning, swinging.
	Site control
Mandatory Safety	All employees shall hold valid PLEA Passports.
Inspection of	All equipment such as, cable rope, stepladder, blowlamp and electrical equipment
equipment	shall be regularly inspected before commencement of work.
Hoisting	All rigging shall be regularly inspected, checked and approved by the qualified
	surveyor and prior to commencing operations.
Certification	Copies of all equipment certificates, surveyor certification shall be submitted
	before commencing work.
Awareness	The design team, contractor and client shall be made aware of all potential
	dangers and risks throughout the contract.

Prepared by	Job Title	Signature	Date

5.0 HSE Competency and Training

5.1 Training

"Company X" will provide and document training and familiarisation of Safe Work Systems of Work. This is to ensure that the organisation has a competent workforce. It the responsibility of management to ensure adequate training is provided and all employees are aware of their respective roles with respect to HSE performance and responsibilities. The company should ensure that there is a process to evaluate persons or companies who provide training for them.

A training needs analysis will be done for each job description and made available to the relevant employees.

Training will cover but is not limited to:

- All Policies
- Safe Work practices
- Emergency response
- Defensive driving
- Accident prevention and reporting
- Environmental awareness
- Hazard communication
- Personal protective equipment
- New employee induction
- Yearly safety awareness training
- Behaviour based training
 - Tropical basic offshore safety induction and emergency training (T-BOSIET)
- Safety leadership or safety management training.

Refer to attachment 5.2 for template of a Training Matrix

5.2 Training Provider Selection

Training providers and instructors must have sufficient experience in training, relevant accreditation and display competence in the subject matter.

After each training session a training evaluation form will be completed by each employee. This would be used to evaluate and review the performance of the training providers. Employee evaluation to the training will be monitored by employees doing a presentation to his/her peers or by supervisor's field evaluation report. These forms will be kept for five years.

Attachment 5.1: Training Needs Analysis

Training Needs Analysis

Employee Name: _____

Employee Position:

Major Tasks for Position	Trainin develop Require		If yes, identify what training needs exist	How will this be Achieved? (e.g. on the job, external training)	When?	Who to organise? Training provider?
	Yes	No				

What do we want to achieve in the period ahead?

Where can you/we see your career moving in the next two years?

How are we going to make this happen?

What will you need from the company to assist you to reach your career goals?

Attachment 5.2: Training Matrix Template

Training Matrix	Revision No.
First Issued: (date)	Revision Date:

<u>Training</u>	Training Matrix									
	OSH TT 2004	Environmental Management	First Aid	Fire Warden	Welding	Scaffolding Construction	Scaffolding Inspection	ACCA	NEBOSH General Certificate	
Job Description				1						
Managing Director	\checkmark	\checkmark	\checkmark							
HSE Coordinator	\checkmark	~	\checkmark	\checkmark					\checkmark	
Operations Manager	\checkmark	\checkmark								
Welding Supervisor	\checkmark	\checkmark			\checkmark					
Scaffolding Supervisor	\checkmark	\checkmark					\checkmark			
Painting Supervisor	\checkmark	\checkmark								
Civil Supervisor	\checkmark	\checkmark								
Mechanical Supervisor	\checkmark	\checkmark								
Accounting Supervisor	\checkmark	\checkmark								
Welder	\checkmark	\checkmark			\checkmark					
Scaffolder	\checkmark	\checkmark					\checkmark			
Painter	\checkmark	\checkmark								
Labourer	\checkmark	✓								
Mechanical Technician	\checkmark	\checkmark								
Accountant	\checkmark	\checkmark						\checkmark		
HSE Officer	\checkmark	✓	\checkmark						\checkmark	

6.0 Security

6.1 Organisational Data Base

"Company X" will keep records of all employees. These records will include but is not limited to employee address, photo, age and last place of employment. The picture of the employee will be verified as being the true likeness by the designated person of "Company X". Employees will be required to provide proof of age (Identification card/Birth Certificate/ Passport), proof of address (Bank statement/ utility bill/ signed lease agreement) and proof of previous employment (references of personnel). The Human Resource department is the custodian of this data base and will be responsible for maintaining and updating the information stored. Refer to Attachment 6.1 for Template of Data Base.

6.2 Character Background Check

"Company X" has a process for carrying out background checks. This will include but is not limited to:

- Provision of a certificate of good character from the Trinidad and Tobago Police Service prior to employment or as required.
- Provision of references from previous places of employment
- Provision of personal references

Various requirements will be required at various stages of recruitment and/or employment and will be at the discretion of the Managing Director. "Company X" reserves the right to carry out any further investigation into an employee's past where there is reason that it may have a negative effect on the company's image.

6.3 Asset Control

The company must account for all tools and equipment and safe guard against damage and theft. Employees of "Company X" are responsible for accounting for all critical safety equipment that is under their care. An equipment pass must be completed for any equipment leaving the premises. The Asset Controls Document (refer to Attachment

6.2). Must be completed in duplicate and copy of this document must be stored in an Asset Controls Folder and the other should stay with the equipment. The location of all tools and equipment must be known at all times.

6.4 Personnel Control

The company must account for all employees working at a client's site. This includes but not limited to check in time, employee movements on client's premises and check out time.

Attachment 6.1 Organisational Database Template

	Revision
Organisational Data Base	No.
	Revision
First Issued: (date)	Date:

Employee Name	Job Title	Address	Age	Last Place of Employment	Reference	Character Background Check
		#1 Daniel				
	Managing	Street				
Jack Daniels	Director	Freeport	45	NA	NA	NA
	Administrative	#89 Fern			John	Yes, in good
Patty Sharp	Assistant	Street	30	Company A	Dickens	standing

Attachment 6.2: Asset Controls Template

From (location): _

To (location):

Equipment

Equipmen	t				
Quantity	Unit of Measure	Description (in	clusive of Serial Number)		
Reason fo	r Removal:				
Will Item	's Be Returned?	Ĺ	Yes, Date:	No	
Safety Ch	ecks Performed Pri	or to Removal	Yes	No	
Equipmen	t in Good Working	Condition:	Yes	No	
Individual	Individual Assigned for Removal:				
		Bl	ock Letter	Signature	
Method of	f Removal:	Hand	Vehicle Number:		
Superviso	r				
	Block	Letter	Signature		
Receiving Party Representative:					
			Block Letter	Signature	

7.0 Health and Hygiene

7.1 Substance Abuse Policy

"Company X" is committed to providing a safe, healthy and productive substance free work environment for all employees, contractors and visitors. It is the duty of every employee to ensure that he/she does not use, possess, buy, sell, distribute or manufacture any illegal or controlled drugs and alcohol on the premises or while operating in the capacity of the organisation. Any employee found guilty of any of the aforementioned will be liable to disciplinary action and also a report will be submitted to the Police Service depending on the nature of the offence.

Definitions

- a. "Substance" includes alcohol, illegal drugs, controlled / prescription drugs and inhalants such as solvents which impair judgment, behaviour, personality and performance.
- b. "Substance abuse" is the excessive use of the substances listed in (a).
- c. "Illegal drugs" are drugs which have been controlled by the government and are illegal in certain situations (a person is not allowed to have them).
- d. "Prescription drugs" are drugs which are regulated by legislation and require a medical prescription before it can be obtained.
- e. "Alcohol" is liquor or brew which can impede judgement. This includes but is not limited to rum, beer, whiskey, wine and vodka.
- "Inhalants" are a diverse group of volatile substances whose chemical vapours can be inhaled to produce psychoactive (mind-altering) effects. This includes but is not limited to glues, spray paint, thinners and cleaning agents.

Testing

f.

"Company X" reserves the right to perform drug testing on its employees. This includes but is not limited to random drug tests, after an accident, on suspicion and upon return to work after injury and /or previous non-negative result.

Screening for alcohol will be done with the breathalyser as per the legal requirement of Trinidad and Tobago. Urine sample will be taken to test for Marijuana, Cocaine and Opiates. External labs will be used to perform the testing and these labs must meet international standards for drug testing.

This will be communicated to employees via memos, emails, posters, training sessions etc.

7.2 Fitness for Work

"Company X" is committed to ensuring the wellbeing of its employees and as such employees will be required to undergo annual medicals. Any employee absent for three (3) days or more must provide a fit for work certificate from a medical practitioner. All medical records will be kept confidential. UKOOA medical will be provided to employees where applicable and the documentation will be stored indefinitely.

7.3 Health Risk Management Plan

"Company X" is committed to minimizing work related health hazards and ensuring welfare facilities are readily accessible. To achieve this, the company will:

- Identify what activities, behaviours, procedures, physical conditions, environmental issues or potential situations that may put employee at risk of any harm.
- Assess the risk and identify what health hazards are associated with these hazards.
- Document the findings of the assessment.
- Conduct medical surveillance on employees involved in high risk jobs.

7.4 First Aid and Medical Access

"Company X" will have adequate first aid supplies relevant to the activities involved in. The supplies will be kept in the main employee office area, workshop and in the Managing Directors office. A first aid kit will be on every job taking place offsite. Selected members of staff will be first aid trained. External medical treatment will be

provided if further treatment is needed at private or public institutions. Government agencies and / or client facilities will be utilised to provide transport of injured personnel. (For emergency numbers refer to Element 8-Criss and Emergency Management)

8.0 Environmental Management

8.1 Environmental Policy Statement

"Company X" is committed to the preservation of the environment and will minimize the company's impact to the receiving environment. "Company X" will manage its waste safely and in a manner that will not result in pollution of the environment and harm to human, animal and plant health.

The company recognises its duty to appropriate environmental practices under the Environmental Management Act 2000. All employees will be given training on the environmental policy. Other methods of communication will include email, posters and memos.

Employees of "Company X" will adhere to any and all environmental procedures and policies on the clients' sites.

Environmental Objectives

- Implement and maintain good environmental practices.
- Identify and reduce environmental impacts
- Promote environmental protection as an integral part of the company's operation.
- Provide relevant information and training on environmental management.
- Continuously monitor environmental performance and implement recommendations.

Managing Director

Date

8.2 Environmental Aspects

The areas identified by "Company X" as having an effect on the environment are:

- Activities within company's premises.
- During transport of equipment and personnel to client sites.
- While in client's site.

Possible environmental impacts are:

- Water Pollution this will include but is not limited to oily water, cleaning products etc.
- Noise Pollution this will be generated by the use of machinery.
- Air Pollution this will include but is not limited to paint mist, exhaust etc.
- Improper disposal of waste this will include paper, electronics, insulation, radioactive substance etc.
- Improper storage of hazardous substances.

Environmental monitoring will be done for expected impacts. If data is found to be above the permissible limits as stated by the EMA, the relevant measures will be taken to reduce the environmental impact.

Table 8.1 Environmental Aspects of "Company X"

Environmental Aspect	Source or Usage	Potential Environmental Impact	Control Measure
Use of water	Kitchen, bathroom, cleaning and maintenance activities	Excessive use and wastage	Responsible usage.
Paper	Documentation, communication, faxes, newspapers.	Excessive use and wastage	Responsible usage and encourage reduced printing of documents. Encourage and set up recycling program
Generation of Waste	Damaged office equipment, used plastic container, scrap metal etc.	Use of landfill	Encourage proper care of equipment, recycle.

8.3 Environmental Legislation

"Company X" will have and make available the relevant environmental legislation. The name of the relevant legislation will be documented in the Document Register refer to Attachment 2.1.

8.4 Environmental Management Program

Waste Management

All emissions and effluent streams leaving the compound will be monitored. All efforts will be made to ensure full compliance to the environmental laws of Trinidad and Tobago and any relevant international standard that may be applicable to the operations of "Company X".

Waste products generated will be disposed of in an appropriate manner whether it is incineration of disposal in a landfill. All waste (such as metals, paper, glass and plastics) will be segregated and stored separately. The company will implement and maintain a recycling program for office paper, newspapers, batteries and cartridges. Any waste leaving the compound must be documented in a waste transfer note (refer to attachment 8.1). A disposal certificate must be provided by the waste removal contractors for all waste disposed of.

It is the responsibility of every employee to deposit waste in the appropriately label containers. It is the responsibility of supervisors and management to training employees on the environmental management system. The HSE Professional will be ultimately responsible for coordinating the removal and disposal of recyclable material, hazardous waste and facilitating environmental monitoring. The HSE Professional is not responsible for disposal of domestic waste.

Spill Response

All spills shall be dealt with safely, efficiently and in manner that would result in minimal impact to the environment. During the transport of hazardous materials between the company's compound and a clients' site, the relevant safety precautions and transport standards shall be followed. Spill response equipment suitable to the material being transported will be stored on the vehicle. Employees will be trained to deal with various spills and this training will be documented. Material from a spill will be disposed of in an appropriate manner.

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It is the responsibility of every employee to ensure that equipment are operated and monitored effectively and in good working condition to prevent spills from the equipment. The employees are responsible for attending to the spill. It is the supervisor to ensure equipment is safe for use and the relevant training is provided. The HSE Professional will arrange for disposal of material and will provide guidance with dealing with the spill.

8.5 Roles and Responsibilities

Roles and responsibilities will be listed for key persons who support the EMS and will be communicated to said personnel.

8.6 EMS Documentation

The company will ensure that all relevant documentation such as Policies, procedures, spill plans and disposal plans will be made available at key locations of the operations. These will be detailed and adequately controlled.

8.7 ERP and Drills

We will identify and list out our environmental emergency scenarios whether the impacts are significant or low and will develop emergency response plans based on those scenarios. We will conduct drills if required (high risk) and write formal reports which will be analysed and send to management.

8.8 Annual Auditing

This environmental policy will be audited against jobs throughout the year to ensure it effectiveness. A formal review will be done annually by competent auditor.

Attachment 8.1: Waste Transfer Note Template

Waste Transfer Note

Waste Type			
Nature of Waste			
Estimated Quantity			\checkmark ,
Disposal Contractor			
Method of Removal		Vehicle No.	
Method of Disposal			
"Company X" Representative	Block Letters	Signature	_
Disposal Contractor Representative	Block Letters	Signature	_
Date		Time	

Attachment 8.2: Spill Response Plan Template

"Company X" is committed to ensuring minimal impacts of its operations to the environment. All users of the substance must be trained to deal with spills. Training will be done for the relevant chemicals with the use of the MSDS and where applicable the use of external providers.

All transport equipment will be fitted with a spill response kit inclusive of absorbent pads, socks, bags and shovels. The Material Safety Data for the material will be on site. Spill kits will be located in workshops and job sites.

How to respond to the spill

- 1. Assess the spill; determine whether it is small, medium or large.
- 2. Isolate area and alert personnel in the area
- 3. Don the required Personal protective equipment
- 4. Use the necessary spill response equipment to dyke area (socks, booms gator)
- 5. If flammable material remove all ignition sources
- 6. Place absorbents on the spill.
- 7. Leave for the material to be absorbed
- 8. Shovel and place in appropriate container / bags and close.
- 9. Secure in waste storage area, clearly label waste.

9.0 Incident Reporting and Investigation

9.1 Reporting, Investigating and Managing of Incidents

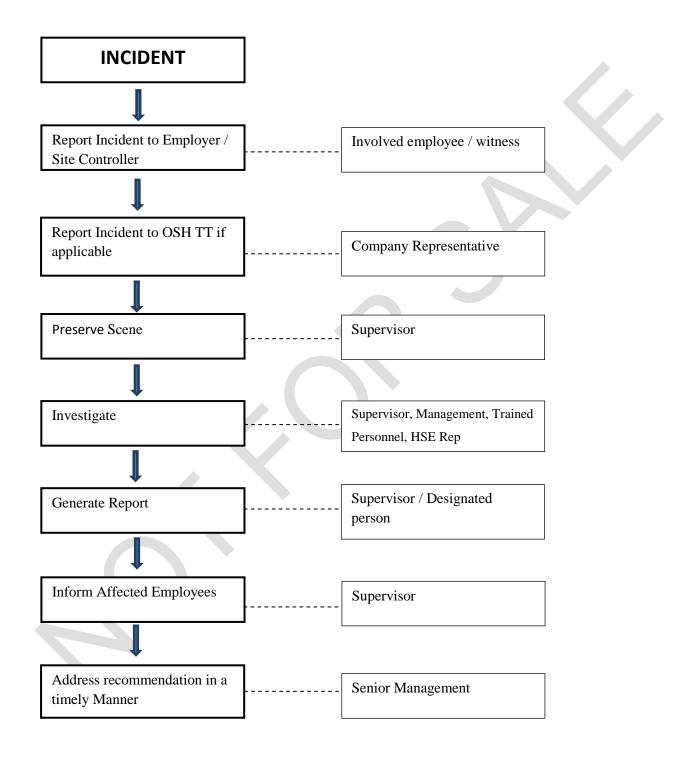
"Company X" is committed to providing a safe working environment as far as is reasonably practicable. The company will undertake any steps possible to ensure the safety of its employees and visitors by preventing incidents from occurring.

All accident, incident, near misses, dangerous occurrences, unsafe conditions and unsafe acts must be reported immediately to the supervisor who in turn would relay the message to other relevant persons and managers. If on a client's site, the incident must be reported to the client representative responsible for the job. All incidents must be reported before the end of the work shift the accident occurred within.

Incidents must be dealt with in accordance to the Emergency Response plans for the various types of incidents.

All incidents must be investigated by the supervisors and managers. In instances where incidents occur on a client's site, the client procedure for incident reporting and investigation must be followed. The employees must take part in the client's investigation if required. The investigation team will be adequately trained and possess the relevant experience to perform investigations (example Tap Root training). The investigation team will comprise of a cross-functional team.

Figure3: Incident Reporting and Investigation Flow Chart and Responsibilities



9.2 Incident Investigation Process for Critical Incidents

There are three levels of emergencies.

Level 1 – Minor and can be dealt with quickly and effectively by personnel on site of incident.

Level 2 – Serious and requires the need for external assistance.

Level 3- Major and requires the need for external assistance.

Incidents categories include:

- Fire, explosion
- Chemical / oil spill
- Injury or illness
- Security breach
- Vehicular accident

Incident will be classified as minor, serious and major. For minor incident the supervisor is responsible for carrying out the investigation. For the serious incident the Department Manager, HSE Professional, Supervisor, and other appropriately trained employees will form the investigation team. In the event of a major incident the Managing Director, HSE Professional, Supervisor, other appropriately trained employees and competent external personnel will comprise the investigation team.

9.3 Stop Work Order

Work must be suspended in the event of an incident. If the incident was minor work will be resumed once the relevant checks are performed and the supervisor indicates it is safe to resume work. In the event of either serious or major incidents, work will be suspended until the situation is evaluated and senior management gives the okay to return to work.

If working on a client's site employees of "Company X" will follow the client's procedure for work stoppage.

Attachment 9.1: Incident Report Form Template

INCIDENT REPORT FORM

Type of Incident		Location of Incident
Employee Name		Job Tile
Length of Employment		Name of Contractor if Applicable
Details of Incident		
Witnesses	Contact Information	Job Title

ate
ate

Attachment 9.2: Investigation Report Form Template

INVESTIGATION REPORT FORM

Type of Incident		Location of Incident	
England Mana			
Employee Name		Job Tile	
Length of Employment		Name of Contractor if Applicable	
Longen of Employment			
Witnesses	Contact Information	Job Title	
Details of Incident		5	
What was employee was	doing at time of incident		
What unsafe condition of	r actions existed to contribut	te to the incident	
What preventative measu	are should have been taken		
Recommendations			
Desegred Day		Date	
Prepared By:		Date	
Approved By:		Date	

10.0 Crisis and Emergency Management

10.1 Identification of Emergency Situation and Consequences

"Company X" is committed to emergency preparedness and response. An emergency response plan will be developed to guide the response for foreseeable emergencies, this includes but is not limited to natural disasters such as earthquakes and hurricanes, fire, medical and activity related emergencies.

10.2 Response Plans

All emergency response plans will be documented and available to all employees. Training will be done with all employees so they understand their roles in emergencies. (Refer to attachment 2.1 document register)

10.2.1 Earthquake

During an earthquake

- If you are indoors, stay there. Get under a sturdy desk or table, or stand in a doorway or corner. Stay clear of windows, bookcases, file cabinets, partitions, and heavy items on a desk or table top that are not bolted down. Stay there until the shaking stops.
- If you are outside, get into the open away from buildings, trees, walls and power lines.
- If you are in a vehicle (inclusive of forklifts and cranes), pull to the side of the road and stop the vehicle. Do not park under bridges or overpasses or overhead wires. Stay in the vehicle until the shaking has stopped. Stay in the vehicle if electrical wires have fallen across it. Do not attempt to cross bridges or overpasses that may have been damaged.

After an earthquake

- Do Not Run Outside. An immediate decision will be made as to whether or not an evacuation is necessary. Remain in the building until you receive notification of this decision.
- If instructed to evacuate, do so to an area outside of the building, away from any structures and power lines.

- An Emergency Coordinator will be identified and act as the central point of contact. Each building will have a Fire Warden and an Alternate Fire Warden. They will be responsible for accounting for all personnel in the building.
- Follow your Evacuation Warden's or Emergency Coordinator's instructions for evacuating your floor or building. If evacuation is executed, remain in your designated Assembly Area until you receive further instructions from your Fire Warden or Emergency Coordinator.
- In the event of injury, first aid will be applied by the designated trained personnel.
- If further help is needed, the fire service will be contacted by the Emergency Coordinator and any injured will be taken to the hospital.
- Inspect premises to ensure that the building is safe to re-enter.

10.2.2 Hurricanes

In the event of a hurricane employees will be informed if they should report to work or stay at home. This is will be determine by the estimated time of landfall.

10.2.3 Fire

In the event of a fire, fire alarm should be raised immediately. Only trained personnel should attempt to extinguish small fires. All personnel should proceed to the Assembly Area unless otherwise communicated. The Fire Wardens are responsible for conducting a head count. The emergency coordinator will be responsible for calling the Fire Service of Trinidad and Tobago.

After the fire is extinguished, the building will be inspected and certified for re- entry by qualified personnel.

10.3 Availability of Emergency Response Equipment

The buildings are fitted with fire alarms, fire extinguisher and hose wheels. All the equipment will be inspected monthly and documented.

10.4 Training on Emergency Response Plan

This plan will be made readily accessible to all employees and internal training will be conducted to ensure employees understand their individual roles under the plan. A training matrix will be used to determine the employees that require specific training under the Emergency Response Plan. Visitors must undergo a safety briefing on arrival at "Company X". The date, time and participants of all training will be documented.

10.5 Drills

An annual drill schedule (inclusive of environmental scenarios) will be prepared prior to the start of each year by the HSE Professional. Drills will be performed monthly / quarterly. They will cover the different possible emergencies (chemical, fires) and may be announced or unannounced. Employees of "Company X" must participate in drills on clients' site where required. The HSE Professional is responsible for planning and executing the drill. He / She will also produce the drill report one week after the execution of the drill. The drill report will document finding and recommendations for action arising out of the drill. Refer to attachment 10.1 for drill report template.

Attachment 10.1: Drill report Template

Drill Report

Type of Drill: Fire

Location: Administration Building

Level of Drill: 1

Date of Drill: 2012/05/12

Scenario

A fire is observed in the kitchen area. An employee pulls the nearest fire alarm pull station. No employees are hurt.

Objectives

- 1. Response time of employees to evacuate the building and assemble at the assembly point.
- 2. Response time of trained personnel to respond to and extinguish the fire.

Observations:

Recommendations:

11.0 Monitoring, Audit and Review

11.1 Measuring, Monitoring, Recording and Analysing HSE Performance

HSE performance will be continuously monitored. All HSE performance related activities such as audits, first aid cases, loss time injuries and fires will be recorded. This will be analysed and reported at the end of each month.

11.2 HSE Inspections and Audits

"Company X" will perform safety equipment inspections; audits on documentation (such as work procedures) and inspection of job sites (refer to attachment 1.6 & 1.7). An audit schedule will be generated by the HSE professional for formal audits, however continuous monitoring must take place during each job by the employees and supervisor. Any finding and / or recommendations arising out of inspection will be address. The following inspection will be completed:

- Safety Equipment (fire extinguisher, first aid kit) inspection Monthly (users are to inspect prior to job).
- Job site / office inspection Monthly (accomplished by safety walk).

Internal audits on documentation will be conducted monthly. A specific document / department will be chosen each month.

11.3 Annual Management Reviews

The HSE professional will generate a quarterly analysis and review of the company's HSE performance. At the end of the year an annual report will be generated. Both reports must be reviewed by senior management (refer to element 1).

11.4 HSE Policy and Standards Review

The HSE policy statement document will be reviewed annually unless:

- There is a change in legislation
- There is a change in equipment and work procedure
- There is a change in key management of "Company X"
- The current policy is deemed to be inefficient

- There is an accident or incident.

The HSE Management System will be reviewed every two years.

11.5 External Audits

Audits for STOW will be conducted annually to maintain STOW Certification.