# HSE Management System Manual

ISO 14001:2015 & ISO 45001:2018

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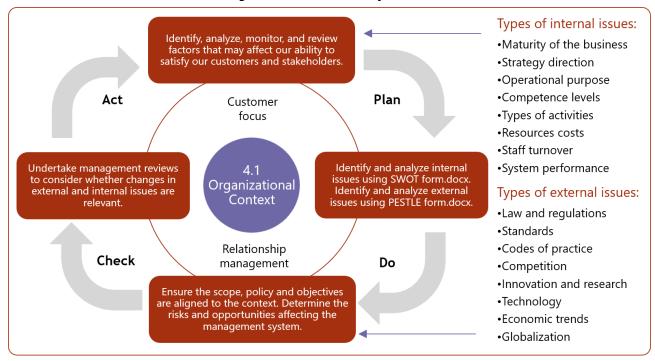
# 4 About Our Organization

# 4.1 Organizational Context

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

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

To ensure that our organizational context is aligned with our strategy whilst taking account of relevant, influential, internal, and external factors; your organization collates and analyzes information pertinent to those influential factors to identify issues that have the potential to be affected by our activities, products, and services.



**Figure 2: Context Discovery Process** 

Similarly, we identify internal and external issues that could be capable of affecting our organization's ability to deliver products, services, or activities. Broadly, these issues are defined as:

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

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

**Environmental issues** – conditions related to climate, air quality, water quality, land use, natural resource availability or biodiversity that can either affect our organization's purpose, or be affected by the impacts of our environmental aspects, which your organization must manage.

The output from this activity is evident as an input to the consideration of risks and opportunities and the actions that we take to address them. For more information about our risk and opportunity management framework, refer to Section 6.1.

Although we acknowledge that ISO 14001 and ISO 45001 does not require our organizational context to be maintained as documented information, we maintain and retain, in addition to this document, the following documented information that describes our organizational context:

- 1. Analysis of business plans, strategies, and statutory and regulatory commitments;
- 2. Analysis of technology and competitors;
- 3. Technical reports from experts and consultants;
- 4. SWOT analysis reports or schedules for internal issues;
- 5. PESTLE analysis reports or schedules for external issues;
- 6. Minutes of meetings (management and design review minutes), process maps and reports, etc.

SWOT analysis provides our organization with a framework for reviewing and evaluating our strategies and the position and direction of our organization, business propositions, and other ideas.

Similarly, PESTLE analysis provides our organization with a framework for measuring our market and growth potential according to external political, economic, social, technological, legal and environmental factors.

#### 4.2 Relevant Interested Parties

Your organization recognizes that we have a unique set of interested parties whose needs and expectations change and develop over time and that only a limited set of their respective needs and expectations apply to our operations or our HSE management system. Such needs and expectations broadly include those shown in the table below.

<b>Interested Party</b>	nterested Party Requirements		Compliance Obligation
Customers	Supply of goods and services to specification	Yes	Contractual
Employees	Continued employment	No	Contractual
Employees	Safe working environment	Yes	Legal
Regulatory	Compliance with the law and regulatory reporting	Yes	Legal
Community	Social responsibility	Yes	Voluntary

To ensure that our products and processes continue to meet all relevant requirements, we identify and assess the potential impact of any relevant needs and expectations that may be elicited from interested parties.

Where appropriate, to ensure that our processes are aligned to deliver the requirements of our interested parties, we convert relevant needs and expectations into requirements that become inputs to our HSE management system and to our product and service designs.

Prioritized relevant needs or expectations are converted into requirements which become inputs to HSE management system planning, and product, or service designs. The outputs from this process are typically used to inform the following sections and processes of this document:

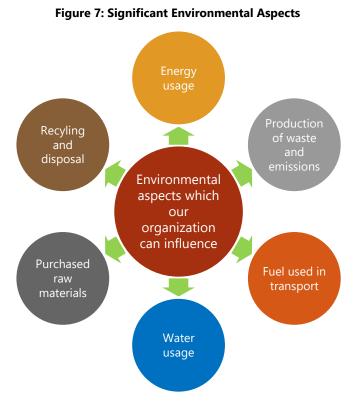
considered when determining the significance of each impact. This process is controlled and communicated using the *Environmental Aspects Procedure*.

The subsequent output from this identification process takes account of the severity of pertinent environmental aspects and our organization's ability to influence them, in order to determine key issues and requirements that pose adverse or beneficial effects in a prioritized way to:

- 1. Ensure that the HSE MS can achieve its intended outcomes;
- 2. Prevent or reduce undesired effects:
- 3. Achieve continual improvement.

Environmental aspects that we address include:

- Those with significant environmental impacts;
- 2. Those that affect compliance with our obligations;
- 3. Those which are priority issues for the organization (e.g. which affect strategy, policy or objectives).



Environmental aspects which pose a significant impact are subject to risk management, corrective action, and monitoring and measurement as appropriate. The HSE MS is structured to identify and manage these aspects in order to control or limit potential impacts and risks that may affect our organization or HSE MS conformity.

The significance of our organization's aspects is reviewed bi-annually, including proposals for new processes, services or developments and environmental aspects arising are also considered and assessed for significance by the HSE Manager. New aspects are added to the *Environmental Aspects Register* as necessary and operational control is altered accordingly.

#### 6.1.4 Legal & Compliance Obligations

Top management and the HSE Manager review all relevant occupational health, safety and environmental related legal requirements, compliance obligations, regulations and Approved Codes of Practice (ACoPs) using <a href="http://www.legislation.gov.uk">http://www.legislation.gov.uk</a>. The HSE Manager ensures that applicable health, safety and environmental requirements are identified and understood in terms of customer requirements and current legislation, including as appropriate:

- 1. Health and Safety at Work Act 1974;
- 2. The Regulatory Reform (Fire Safety) Order 2005;
- 3. Workplace (Health, Safety and Welfare) Regulations 1992;
- 4. Management of Health and Safety at Work Regulations 1999;
- 5. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013;
- 6. Control of Substances Hazardous to Health Regulations (COSHH) 2002;

#### 5. All equipment is visually checked before use.

Hired equipment is always acquired from reputable companies who supply properly maintained equipment that is safe to use and suitable for the job. Upon receipt, the equipment is checked to ensure it has not been damaged in transit.

All buildings; leased or owned by your organization are deemed to be a safe working environment. Internal inspections and external reports on fixed fire mains and fire alarm testing etc. are conducted, and records retained. The working environment is deemed safe through internal inspections and external regulatory inspections such as gas boiler servicing, fire alarm servicing, PAT testing, and fixed electrical equipment testing, etc.

All staff is afforded a good working environment to conduct their business. Welfare arrangements are available through toilets, rest areas, water and coffee machines, etc. PPE is issued to all staff as required, and a <u>PPE Issue</u> <u>Record</u> is maintained and held by the <u>Health & Safety Department</u>.

#### 8.1.1.2 Eliminating Hazards & Reducing OH&S Risks

Using the hierarchy of controls as a basis, your organization eliminates or reduces occupational physical, chemical, biological or psychosocial hazards from our operational activities. The controls are implemented by selecting the most effective measures necessary to mitigate residual risks to an acceptable level (ALARP).

The hierarchy of control is used to select the risk control that most effectively eliminates or minimizes the risk associated with a hazardous task. This may involve using a single risk control measure or a combination of two or more different risk controls to allow the hazardous task to be undertaken safely.

Control measures are implemented to eliminate, or minimize the frequency, magnitude and duration of movements, forces and postures by changing the sources of risk, e.g., the work area, tool, load, environment, method of handling and/or the way work is organized.

Most effective Hard controls: •Eliminate the hazardous manual task Eliminate the hazard by removing the cause of during design processes danger •Automate the hazardous manual tasks (such as using remote controls) •Deliver goods directly to the point of Substitute by replacing the hazardous use to eliminate multiple handling work practice or materials •Isolate machinery from the user Storing gas cylinders in specific storage facilities Engineering controls to isolate people from the hazard •Energy tag and lockout procedures •Use of mechanical lifting aids Administrative •Install emergency stops adjacent to controls to change plant how people work •Install guards to prevent contact with Protect moving parts workers •Include of pressure relief valves on high pressure equipment Provide height adjustable Least effective workstations

**Figure 8: Hierarchy of Controls** 

The following table provides examples of control measures that may be implemented to control the risks associated with hazardous tasks:

Hierarchy of Control		Examples of Risk Control Measures
		Eliminating the hazardous manual task during design processes.
	Elimination	Automate the hazardous manual tasks (such as using remote controls).
		Deliver goods directly to the point of use to eliminate multiple handling.
		Replace heavy items which are lighter, smaller and/or easier to handle.
	Substitution	Replace hand tools with power tools to reduce the level of force required to
		do the task.
Lin al		Isolate machinery from the user.
Hard Controls	Isolation	Storing gas cylinders in specific storage facilities.
Controls		Energy tag and lockout procedures and processes.
		Use mechanical lifting aids.
		Installing emergency stops adjacent to plant.
	Engineering	Installing guards to prevent contact with moving parts.
	Engineering	Installing rollover protection.
		Inclusion of pressure relief valves on high pressure equipment.
		Provide workstations that are height adjustable.
		Rotate workers between different tasks.
		Pre-start inspections.
		Maintenance programmes to ensure plant is maintained appropriately.
		Develop work instructions/JSAs/QRAs for undertaking tasks involving plant.
	Administrative	Provide adequate training and supervision.
		Licencing requirements/permit to works.
Soft Controls		Installing warning signage.
		Train workers to use control measures implemented when carrying out
		normal tasks.
		Ergonomic computer mouse/keyboard.
	PPE	High visibility clothing, hard hats, safety footwear, gloves, safety goggles, ear
		plugs, etc.
		Shock absorbent shoes for work on hard concrete floors.

By applying the hierarchy of controls during the earliest stages of the design and development process, your organization also proactively identifies and mitigates foreseeable occupational hazards early in the design process. Prevention through design addresses hazards mainly by elimination and substitution.

#### 8.1.1.3 Management of Change

The HSE Manager in conjunction with relevant process owner(s) identifies relevant risks and opportunities in order to assess the potential impact of each change to current process practices and activities that might impact upon the performance of the management system. Change proposals and assessments are presented to Top management for consideration and approval.

Management system reviews and planning activities are performed, prior to the implementation of any significant changes that might impact the effectiveness of our health, safety and environmental management system, in order to minimize adverse effects, as necessary. These types of change may be:

- 1. Planned or unplanned;
- 2. Sudden or gradual;

performance reviews as appropriate. Where applicable a life cycle approach is taken within the operational controls so that the hazards at each stage can be controlled or influenced.

#### **Supporting documentation:**

Doc No.	Title & Description
P0811-01	Health & Safety Control Procedure

#### 8.1.2 Environmental Planning & Control

Your organization undertakes analysis to map out the high-level life cycle of our organization's products and services using the *Life Cycle Analysis Template*. By identifying and documenting information about the relevant environmental aspects, we can prevent or mitigate adverse environmental impacts during each life cycle phase.

Life cycle stages: Establish controls to ensure environmental requirement(s) are Design and development addressed during the design and development of the product or service, •Raw material acquisition considering each stage of its life cycle. •Manufacturing operations Plan Act Transportation, both inward and outward Value chain Use of products or services by customers Provide information about •Final disposal after the 8.1.2 Determine its environmental significant environmental impacts end of life etc. requirement(s) for the **Operational** associated with the transportation procurement of products and Opportunities: Control or delivery, use, end-of-life services as appropriate. treatment and final disposal Waste reduction Reduction in pollutants Product life-cycle •Use of renewables Check Do •Reduction in emissions Waste heat recovery Communicate its relevant environmental •Restriction of hazardous requirement(s) to external providers, substances including contractors. Emission testing

Figure 10: Life-cycle Approach

Your organization considers the environmental requirements and aspects that can be controlled and influenced during each phase of the product life-cycle. Where applicable, a life cycle approach is taken within our operational controls so that the environmental impacts at each stage of the life-cycle are identified, assessed, and controlled, or influenced.

By identifying and documenting information about the relevant environmental aspects (6.1.3) and the relevant legal and compliance requirements (6.1.4), we are able to prevent or mitigate adverse impacts during each lifecycle phase:

- 1. Design phase;
- 2. Procurement phase;
- 3. Manufacturing phase;
- 4. Packaging, transport and delivery phase;
- 5. Intended use;
- 6. End of life treatment and final disposal.

The audit frequency is also based upon process performance trends, results from previous audits, levels of customer satisfaction, rates of nonconformity and corrective action, etc., to ensure that our organization focuses on the aspects that affect product and process conformity the most.

The criteria, scope, frequency and methods of each audit are defined in the audit reports. The selection of trained auditors and their subsequent impartial conduct ensures objectivity throughout the audit process and that:

- 1. The results of each are reported to the HSE Manager;
- 2. That timely appropriate corrective action undertaken where required;
- 3. They retain documented information such as audit checklists and audit reports as evidence of the effective implementation of the audit programme in respect of each audit.

Internal auditors are selected to ensure objectivity and impartiality of the audit process. This is achieved by selecting a team of auditors from cross-functional departments who have received the appropriate training in the auditing process.

The audit is conducted according to the <u>Internal Audit Procedure</u> to ensure that timely corrective actions are implemented to correct any deficiencies found. The results of the audits are recorded and submitted to the personnel having responsibility in the area audited. The results of the internal audits are summarized for discussion at management reviews.

#### **Supporting documentation:**

Doc No.	Title & Description
P0920-01	Internal Auditing Procedure

# 9.3 Management Review

#### 9.3.1 General

To ensure the continuing suitability, adequacy and effectiveness of our HSE management system in meeting our organization's strategies, Top management conducts formal management review meetings at planned internals. The requirements for conducting a management review are defined and communicated using the *Management Reviews Procedure*.

Each management review meeting may require multiple subjects and departmental input and rely upon multiple metrics and data analysis. When more frequent meetings are conducted, the meeting agenda is reduced to focus on customer-critical issues, with the full review cycle of the HSE occurring annually.

Agenda Item (9.3.2)	Impact on Customer or Business	Frequency	Type of Meeting
Previous actions	High	Monthly	Functional review
Changes to the HSE	Low	Six-monthly	HSE review
Significant hazards	Very High	Weekly/Daily	HSE review
Performance of the HSE	High	Monthly	Functional review
Environmental aspects	High	Monthly	Functional review
Legal requirements	Medium	Quarterly	Planning review
HSE objectives	Low	Six-monthly	Functional review
NCR/CAR/Incident root-causes	Medium	Quarterly	Planning review

Agenda Item (9.3.2)	Impact on Customer or Business	Frequency	Type of Meeting
Monitoring and measurement results	Very High	Weekly/Daily	HSE review
Internal audit results	Low	Six-monthly	HSE review
Consultation and participation	Medium	Quarterly	Planning review
External providers	Medium	Quarterly	Planning review
Resources required	Low	Six-monthly	HSE review
Actions to address risk	High	Monthly	Functional review

In response to changing or special conditions and events, the frequency of management review activities will increase.

In summary, a Senior Director chairs the HSE Review Meeting. The review group is coordinated and recorded by the HSE Manager. To ensure that the review group includes each of the requirements of ISO 14001 and ISO 45001, a <u>Management Review Agenda & Minutes</u> is prepared issued and distributed by the HSE Manager as appropriate.

#### **9.3.2** Inputs

The primary inputs that are reviewed comprise data from conformance and performance measurements that are gathered at key HSE data points from various processes. Subsequent recommendations for improvement are based on the evaluation of such measurements.

Conformance is primarily assured through internal audits and demonstrated through a review of audit results and our demonstrated ability to detect, correct, and prevent problems. Performance is primarily assured through the deployment of corporate and operational level objectives and through the review of our demonstrated ability to achieve desired results.

#### 9.3.3 Outputs

The primary outputs of management review meetings are management actions that are taken to make changes or improvements to our HSE management system. During management review meetings, Top management identifies appropriate actions to be taken regarding the following issues:

- 1. Improvement of the effectiveness of the HSE management system and its processes;
- 2. Improvement of product related to customer requirements;
- 3. Opportunities and risks;
- 4. New hazards:
- 5. Resource needs.

The primary outputs of management review meetings are the actions necessary to make changes or improvements to our management system and the provision of resources needed to implement these actions. Responsibilities for required actions are assigned to members of the management review team. Any decisions made during the meeting, assigned actions, and their due dates are recorded in the management review minutes.

#### **Supporting documentation:**

Doc No.	Title & Description
P0930-01	Management Review Procedure

## A.3 Correlation Matrix

This section provides a matrix that correlates the headings of ISO 14001 and ISO 45001 against the relevant sections in this document.

ISO 14001:2015 and ISO 45001:2018		Related Documentation	
Clause	Title	HSE Manual	Procedure No.
4.1	Organizational Context	4.1	P0400-01
4.2	Relevant Interested Parties	4.2	P0400-01
4.3	Management System Scope	4.3	P0400-01
4.4	Management System Processes	4.4 & A.1	P0400-01
5.1	Leadership & Commitment	5.1	N/a
5.2.1	Establishing the Policy	5.2.1	N/a
5.2.2	Communicating the Policy	5.2.2	N/a
5.3	Roles, Responsibilities & Authorities	5.3 & A.2	P0530-01
5.4	Consultation & Participation	5.4	P0540-01
6.1.1	Risks & Opportunities	6.1.1	P0611-01
6.1.2	Hazard Identification	6.1.2	P0612-01
6.1.2	Aspect Identification	6.1.3	P0613-01
6.1.3	Legal Requirements	6.1.4	P0614-01
6.1.4	Planning Action	6.1.5	N/a
6.2.1	HSE Objectives	6.2.1	P0620-01
6.2.2	HSE Objectives & Plans to Achieve Them	6.2.2	P0620-01
7.1	Resources	7.1	P0710-01
7.2	Competence	7.2	P0723-01
7.3	Awareness	7.3	P0723-01
7.4.1	Communication - General	7.4	P0740-01
7.4.2	Internal Communication	7.4	P0740-01
7.4.3	External Communication	7.4	P0740-01
7.5.1	Management System Documents	7.5.1	P0750-01
7.5.2	Creating, Updating & Issuing	7.5.2	P0750-01
7.5.3	Control of Documented Information	7.5.3	P0750-01
8.1.1	Health & Safety Planning & Control	8.1.1	P0811-01
8.1.2	Environmental Planning & Control	8.1.2	P0812-01
8.2	Emergency Situations	8.7.2	P0820-01
9.1.1	Monitoring & Measuring Equipment	9.1.1	P0911-01
9.1.2	OHS Analysis & Evaluation	9.1.1	P0912-01
9.1.3	Environmental Analysis & Evaluation	9.1.1	P0913-01
9.1.4	Evaluation of Compliance	9.1.2	P0614-01
9.2.1	Internal Audit - General	9.2.1	P0920-01
9.2.2	Internal Audit Programme	9.2.2	P0920-01
9.3.1	Management Review - General	9.3.1	P0930-01
9.3.2	Management Review Inputs	9.3.2	P0930-01
9.3.3	Management Review Outputs	9.3.3	P0930-01
10.2	Nonconformity & Corrective Action	10.2.1	P1020-01
10.2	Incident Investigation & Reporting	10.2.2	P1020-02
10.3	Continual Improvement	10.3	P1030-01