Safety Management Model HK

The General Characteristics of an SMS

- **System objectives** (for SMS these may be ethical, economic, legal and organisational goals; not all systems need have the same objectives).
- Specification of system elements and their inter-relationship; not all systems need have the same elements.
- Determining the relationship of the SMS to other systems (including the general management system, and the regulatory system, but also technology and work organisation)
- Requirements for system maintenance (which may be internal, linked to a review phase, or external, linked for example to industry policies that support OSH best practice)

System objectives

- **Management Systems or Systematic Management**
  - This ‘management systems’ form must meet stringent criteria. Where these requirements of a ‘system’ are not met, then the term is said to be inapplicable. On the other hand, ‘systematic management’ is described as ‘…a limited number of mandated principles for a systematic management of OHS, applicable to all types of employers including the small ones’ (Frick et al., 2000:3).
  - This approach stems from methods of regulation found in Hong Kong where businesses (including smaller ones) are encouraged or required to comply with a less demanding framework than ‘management systems’, e.g. eight safety elements.

System objectives

- Voluntary or Mandatory Implementation Methods
  - Voluntary systems implement strategic objectives relating to employee welfare or good corporate citizenship, although there may be other motives such as reducing insurance costs.
  - Mandatory systems adopt SMS to comply with the requirements of law, customers and suppliers, principal contractors and other commercial bodies.
  - Hybrid methods are said to entail a mixture of voluntary motives and legislative requirements.

Integrated system elements

SMS is defined as:
- ‘distinct elements which cover the key range of activities required to manage occupational health and safety. These are inter-linked, and the whole thing is driven by feedback loops’. (Warwick Pearse)
- ‘…a combination of the planning and review, the management organisational arrangements, the consultative arrangements, and the specific program elements that work together in an integrated way to improve health and safety performance’ (Gallagher, 2000)
- The specific elements of an SMS in Hong Kong entailed by her broad definition are the 14 safety elements.
Management framework structure

There are 14 elements which make up the occupational safety management framework. These elements can be broken up into three broad categories:

i) System structure – the basic structures which must be in place for the system to work effectively. These are:

Safety policy
A safety policy which states the commitment of the proprietor or contractor to safety and health at work.

Organisational structure
A structure to assure implementation of the commitment to safety and health at work.

Safety training
Training to equip personnel with knowledge to work safely and without risk to health.

In-house safety rules
In-house safety rules to provide instruction for achieving safety management objectives.

Management framework structure

There are 14 elements which make up the occupational safety management framework. These elements can be broken up into three broad categories:

ii) System activity – the key activities to identify and control hazards in the Workplace:

Inspection programme
A programme of inspection to identify hazardous conditions and for the rectification of any such conditions at regular intervals or as appropriate.

Hazard control programme
A programme to identify hazardous exposure or the risk of such exposure to the workers and to provide suitable personal protective equipment as a last resort where engineering control methods are not feasible.

Accident/incident investigation
Investigation of accidents or incidents to find out the cause of any accident or incident and to develop prompt arrangements to prevent recurrence.

Management framework structure

There are 14 elements which make up the occupational safety management framework. These elements can be broken up into three broad categories:

iii) System review – regular review of performance to ensure the system is operating effectively and to encourage continuous improvement:

Safety and health awareness
Promotion, development and maintenance of safety and health awareness in a workplace.

Accident control and hazard elimination
A programme for accident control and elimination of hazards before exposing workers to any adverse work environment.

Occupational health assurance programme
A programme to protect workers from occupational health hazards.
Element 1 (CSB core element)

**Safety Policy**

- A safety policy which states the commitment of management to safety and health at work
- The organisation’s policies are visionary, based on solid evidence of what the organisation can achieve, and promote a consistent approach to safety and health at all levels of the organisation
  - Develop a corporate/site safety policy
  - Commitment
  - Contents
  - Review of safety policy

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**Key Concepts of Safety Management System**

**Safety Policy – Statement of Intent**
- 'People are our most important asset'
- 'Total safety is the ongoing integration of safety into all activities with the objective of attaining industry leadership in safety performance. We believe nothing is more important than safety; not production, not sales, not profits'
- 'Effective control of health and safety is achieved through co-operative effort at all levels in the organization'
- 'The company believes that excellence in the management of health and safety is an essential element within its overall business plan'

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**Key Concepts of Safety Management System**

**Safety Policy – Statement of Intent**
- 'A good safety record goes hand in hand with high productivity and quality standards'
- 'We believe that an excellent company is by definition safe company. Since we are committed to excellence, it follows that minimizing risk to people, plant and products is inseparable from all other company objectives'
- 'Prevention is not only better, but cheaper than cure. There is no necessary conflict between humanitarianism and commercial considerations. Profits and safety are not in competition. On the contrary, safety is good business’
Key Concepts of Safety Management System

Safety Policy – Statement of Intent
• ‘All accidents and ill health are preventable’
• ‘The identification, assessment and control of health and safety and other risks is a managerial responsibility and of equal importance to production and quality’
• ‘The preservation of human and physical resources is an important means of minimizing costs’

General Statement

• Top Management commitment
  – Provide of adequate resource
  – Recognize safety is a line management function
  – Ensure involvement
  – Ensure competence of staff
  – Ensure understanding of safety policy
  – Periodic review

Safety Policy Statement

• Written
• Prepare and revise as necessary
• Bring to the notice of all workers
• Keep copies of current & revised version
• Make available for inspection

Content of Policy Statement

• Statement of general policy with regard to safety and health of workers
• System of allocation of responsibilities
• Arrangement to execute the responsibilities

Review of Safety Policy

• Not less than once in each 2 year period
• As soon as is practicable after alteration

Element 2(CSB core element)

Safety organizational structure
安全組織架構
◆ A structure to assure implementation of the commitment to safety and health at work
◆ The organisation provides the framework for using people, plant and processes successfully.
  – Assigning safety and health responsibilities
  – Line organization
  – General responsibilities
  – Functional responsibilities
  – Programme responsibilities
  – Accountability
Assignment of Key Safety Responsibilities

**Key Principles**

- Individual safety responsibilities should be clearly defined to those involved. Where job descriptions are used they should include such responsibilities.
- Responsibilities should be reasonable and all employees should be given the authority and resources (including time) necessary to carry out their responsibilities.
- Appropriate arrangements should exist whereby employees are held accountable for discharging their responsibilities.

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**Assignment of Key Safety Responsibilities**

**Top/Senior Management**

- Responsible for strategic planning.
- Determining which safety programmes are to receive priority.
- Monitoring the outcome of safety programmes.
- Ensuring compliance with legislation and standards.

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**Assignment of Key Safety Responsibilities**

**Who is Responsible for Safety?**

- Absolute responsibility for safety in an organization is the direct responsibility of the person who is ultimately in charge of the organization.
- Safety needs to be delegated and persons held accountable.
- The authority delegated to carry out safety responsibilities must operate in the same way as other management functions.
- Degree of authority delegated must equal the amount of responsibility given.

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**Assignment of Key Safety Responsibilities**

**Reporting relationships should be clear and unambiguous.**

- Where personal appraisal system exists, safety performance should be included in the appraisal system.
Assignment of Key Safety Responsibilities

Line Managers and Supervisors
• Overall supervision of employees to ensure safety of them, the public and customers.
• Implementation of particular safety programmes.
• Hazard identification (this may be best achieved by regular inspections).
• On-the-job training.
• Efforts to motivate employees, including specific directives when giving orders.

Assignment of Key Safety Responsibilities

Line Managers and Supervisors
• Control of plant and equipment.
• Accident investigation and reporting.
• Issue, use and maintenance of personal protective clothing and equipment.
• Submission of reports and recommendations/suggestions to more senior management levels.
• Decision making regarding job design, workplace layout and (possibly) recruitment.

Assignment of Key Safety Responsibilities

Human Resources Department
• Specific time allocation must be given to enable duties under safety function to be carried out.
• Build up a list of outside contacts and sources of technical and health information, as it is likely that this type of assistance will be required.
• Participate in a safety committee.
• Co-ordinate staff training.

Assignment of Key Safety Responsibilities

Safety Officer
• Conducting inspections.
• Reporting any unsafe and unsatisfactory conditions, procedures or operations to the supervisor or executive in charge.
• Acting as adviser to executive and supervisory staff in all matters concerning prevention of accidents, injury, hazard, disease and the promotion of safety. Monitoring the organization’s overall safety performance.
• Receiving and reviewing all accident and injury reports or reports of any potential hazards or near misses.

Assignment of Key Safety Responsibilities

Safety Officer
• Investigating selected accidents, hazards or near misses, as distinct from the obligatory investigation made by supervisory staff, and recommending the appropriate action to prevent a recurrence.
• Maintaining an injury record system generally in accordance with relevant standards.
• Attending all meetings of safety committees, and staff meetings or conferences where safety matters are discussed or considered.

Assignment of Key Safety Responsibilities

Safety Officer
• Organizing safety training of employees in conjunction with executives and supervisors. Instituting safety promotion campaigns to create and maintain an interest in safety at all levels. Conducting or arranging safety induction courses for new employees.
• Identifying necessary resources and being aware of the availability of specialist support advice. Ensuring that first aid facilities are adequate and maintained in satisfactory condition. Also making arrangements with ambulance, casualty and medical services to be available as required.
• Monitoring and interpreting legislation and standards relevant to safety. Advising of changes.
Assignment of Key Safety Responsibilities

Safety Officer
- Reviewing and updating safety manuals, rules, procedures, etc.
- Encouraging compliance and safe behaviour through distribution of literature, posters, warning signs, videos and films, etc. This material can be either general (such as an induction handbook) or on specific topics (such as handling harmful chemicals, lifting, etc.).
- Liaising with the organization’s insurance company or broker. This person may also be involved in liaison in a workplace rehabilitation programme.
- Maintaining contact with government departments and authorities.

Assignment of Key Safety Responsibilities

Safety Officer
- Staying abreast of safety technologies within the particular industry.
- Carrying out or organizing research into safety matters.
- Answering inquiries from management, supervisors and employees.
- Evaluating safety products and systems, and advising management on their suitability and application to the organization.

Assignment of Key Safety Responsibilities

Safety Representatives
- Agents in promoting employee participation in safety at the workplace.
- Generate an interest in safety throughout the area which he/she represents.
- Preferably elected by those he/she will represent, with rotation system in place.
- Should have right to know about safety, inspect the workplace and participate in safety issues.

Assignment of Key Safety Responsibilities

Safety Committee
- To enable frontline workers to take an active part in the promotion of a safe workplace.
- To give employees the understanding necessary to assess the feasibility and cost factors of proposed remedial measures.
- To obtain the benefit of the great store of knowledge and experience possessed by many employees regarding safety aspects of the work they perform by obtaining feedback from them.
- To review measures taken to ensure the safety of persons at the workplace.

Assignment of Key Safety Responsibilities

Safety Committee
- To investigate matters brought to the employer’s attention which a committee member or employee considers to be unsafe.
- To assist in the development of recording system for accidents and hazardous situations and to promote among employees an understanding of such matters as accident causation by the review of recent accidents.
- To assist in the development of a safe working environment and safe systems of work.

Assignment of Key Safety Responsibilities

Safety Committee
- To assist in the formulation and effective implementation of an organization’s overall safety policy.
- To monitor measures taken to ensure the proper use, maintenance and (if necessary) replacement of protective equipment.
- To make recommendations to the employer regarding safety matters.
Assignment of Key Safety Responsibilities

First Aiders
- Dispense and control items from first aid facilities.
- Ensure first aid supplies are adequate.
- Treat minor wounds and injuries, such as applying dressings, stopping bleeding and treating burns.
- Deal with fits/fainting.

Assignment of Key Safety Responsibilities

First Aiders
- Resuscitation.
- Record accident/injury details in accident book.
- Arrange further assistance if required.
- Advise management immediately of any serious or potentially serious accident for which treatment has been required.

Assignment of Key Safety Responsibilities

Other Professionals
- Occupational health nurse.
- Occupational physician (company doctor).
- Occupational hygienist.
- Organizational psychologist.
- Risk manager.
- Rehabilitation counselor.
- Ergonomist.

Element 5 (CSB core element)
Occupational Safety and Health Committees

- Platform for consultation and communication to identify, recommend and keep under review measures to improve the safety and health at work.
  - Policy
  - Legal requirements
  - Functions of safety committee
  - Organization of safety committee
  - Roles of members
  - Planning
  - Implementing
  - Follow-up

Legislative Requirements

1. Setting up of Safety Committee

Not less than one safety committee with the function of identifying, recommending and keeping under review measures to improve safety and health

[Section 10 (a) of the Safety Management Regulation]
Why do you need a safety committee?
• A proprietor or contractor of a factory, shipyard, construction work or designated undertaking having an aggregate of 100 or more workers in a day working
• A construction contractor with a contract value of $100 million or more
Need to establish not less than one safety committee

Example
 A Large factory with branches in different districts
 A construction company operating construction sites at different locations

How do you form a safety committee?
Composition
– not less than half the members of the committee represent workers
– a written statement setting out rules governing its membership, terms of reference and meeting procedures

What does the committee do?
Function
To identifying, recommending and keeping under review measures to improve the safety and health of the workers

Function of Safety Committee
• Monitoring the safety policy
• On-going evaluation of hazards and arrangements to implement safety measures
• Establishment of arrangements to deal promptly and effectively with dangerous working conditions
• Discussion and establishment of a mechanism to resolve disputes when workers refuse work on the grounds of imminent danger

Function of Safety Committee
• Assistance in the development of safe working procedures and safe system of work
• Vetting of accident/incident ill-health statistics to identify trends and monitor safety performance
• Submission of reports
• Examination of safety audit reports
• Scrutiny of safety performance reports submitted by the safety training
Function of Safety Committee

- Monitoring of the adequacy and effectiveness of safety training
- Monitoring of the adequacy of safety and health communications and publicity in the workplace
- Organization of safety promotion activities
- Provision of links with external sources regarding safety and health

Safety Committee

Terms of reference

- Assisting in the development of safety policies and procedures
- Studying accident and ill health statistics and trends; preparing reports for senior management and making recommendations for action;
- Examining safety audit reports and recommending a course of action to implement changes flowing from the report findings

How often should the committee meet?

- The committee meets at least once every 3 months
- The committee keeps records of its meetings for not less than 5 years after the date of the meeting

Protection of Safety Committee Members

A proprietor, contractor or employer shall not

(a) Terminate, or threaten to terminate, the employment of; or

(b) In any way discriminate against, a worker by reason of the fact that the worker has performed his function as a member of a safety committee.

[Section 12 of the Safety Management Regulation]
Subjects suitable for discussion by the consultative committee
• Safety policies and procedures
• General conditions of employment
• Education and training
• Formulation of safety rules
• Working conditions etc.

Two-way communication
• Telling down
  – the management line, through team briefings, written methods, presentations, notice boards, etc., to keep employees informed of decisions and all matters affecting them.
• Listening up
  – through elected representatives, to obtain the views, feelings and ideas of employees, through their elected representatives, before decisions are taken.

An ideal consultative committee
• Committee size
  – 15 is the maximum number
• The shape may like this
  – Chair
  – Secretary
  – Three management nominees
  – Ten employee representatives

Organization
• The Central safety committee is organized into a number of task groups
• The titles of the task groups may be as follows:
  – Rules and procedures
  – Inspections and audits
  – Fire and emergency
  – Education and training
  – Health and environmental
  – Accident investigation etc.

Task Groups
• Most task group heads are department heads
• Supervisors and employees are selected by the task group
• Each task group is assisted by a staff of safety and health department
• Each task group must coordinate internally with other task groups
• Discussion with their peers prior to making recommendation to Central Safety Committee

Structure of Safety Committee for Small Organizations
• The Central Safety Committee is responsible for overall planning, organizing, leading, and controlling of safety and health activities.
• A safety review officer should be assigned in advance, to enhance the review.
Running Safety Committee Meetings
- Duties of the chair, secretary, members
- Venue and seating arrangements
- Opening the meeting
- Keeping control
- Discussing each item
- Encouraging contributions
- Summarising
- Length of meeting

Proceedings of Meetings
- Written Statement setting out terms of reference and meeting procedures
- Program arranged well in advance with notices and record published
- Records kept for not less than 5 years
- Record available for inspection upon request

Effective Safety Committee
- Good communication
- Regular meetings
- Speedy decisions
- Participation by member in periodical joint inspections
- Involving more employees
- Organize regular site visit

Style
- Planned beforehand
- List matter to be discussed
- Formality is essential

Frequency of Meetings
- depend on the work/circumstances/size of work force/kind of work/degree of risk inherent
- meet at least once every three months, however, monthly meeting suggested

Meeting Agenda
- The agenda usually includes the following items:
  - Chairperson's opening comments
  - Safety officer's report
  - Department head's comments on accident in their departments
  - Task group head's reports
  - Chairperson's closing comments

Element 10(CSB core element)
Emergency Plan
- to develop, communicate and execute plans prescribing the effective management of emergency conditions
  - Policy
  - Identification of all potential emergencies
  - Emergency planning
  - Organizing
  - Emergency response plan
  - Reviewing
Emergency preparedness and response

- Contingency plans need to be established to mitigate the effects of any emergency that might affect the organization. As well as assessing the risks posed by the organization’s own operations and practices, the organization also needs to be aware of hazards posed by neighbours, which may affect the organization.
- Organizations need to return to business as soon as possible, so they need to put in place plans for minimizing disruption following an emergency evacuation. Typical areas to be considered include:
  - Recovery of software for information technology systems.
  - Safe recovery of undamaged plant and equipment from the original site.
  - Maintaining the safety management system at temporary sites.
  - Reviewing the operation of the safety management system in the light of the emergency to identify any areas of failure.

Writing the emergency plan

1. Plan title and authority
2. Table of contents
3. Aim and objectives of the plan
4. Introduction
   - Facility description
5. Definition of an emergency
6. Hazards
7. Types and levels of emergency
   - Identification of emergency scenarios
    - Facility emergency scenario
    - Site emergency scenario
    - Community emergency scenario
8. Emergency procedures
9. Emergency resources
   - Facility emergency control centre
   - Emergency equipment
   - Emergency alarm system

10. Activation of the emergency plan
    - Notification to the emergency services
    - Emergencies with potential for environmental impact
11. Reporting of an emergency
12. Termination of an emergency
13. Management of the plan
14. Supporting information
    - Safety, health and environmental information
    - Location maps
    - Site layout plans
    - Emergency contact numbers
    - Other supporting information
    - Glossary of terms and abbreviations

Element 3

Safety training

- Training to equip personnel with knowledge to work safely and without risk to health
  - Self-improving cycle
  - Training needs analysis
  - Training plan
  - Evaluation of the effectiveness of training
  - Maintenance of training records

- The competencies (knowledge, skills, experience and abilities) needed to work effectively, efficiently and safely are understood by the organisation.
Element 4
In-house safety rules

- In-house safety rules to provide instruction for achieving safety management objectives

In-house safety rules is an administrative control
- Planning and organizing of in-house safety rules
  - General safety rules
  - Specialized safety rules
- Monitor compliance
- Reviewing

<table>
<thead>
<tr>
<th>Framework</th>
<th>Safety Management System Requirements (Code of Practice On Safety Management)</th>
<th>ISR Checklist or questionnaire Item Number</th>
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<tbody>
<tr>
<td>In-house Rules</td>
<td>Instructions for general and special foreseeable risks</td>
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<td></td>
<td>A system for identification and establishment of instruction for general and foreseeable risks in safety plans, work procedures.</td>
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<td></td>
<td>A system for identification and establishment of specialized rules</td>
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<td>System (safety committee/tool box) for management and employees to document and communicate on OSH work rules and procedures.</td>
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<td>Written disciplinary policy for violation of rules</td>
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Element 7
Job-hazard analysis-risk assessment

- Evaluation of job related hazards or potential hazards and development procedures

  - Risk assessment policy
  - Planning of risk assessment
  - Organizing
  - Implementing and maintaining the risk control measures
  - Monitoring
  - Reviewing

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<tr>
<td>Evaluation of Job Related Hazards</td>
<td>Program for risk assessment and risk control</td>
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<td>A system for identifying job related hazards, assessment of risk, implementation and maintenance of safety procedures and risk control measures and review.</td>
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<td>A system of analyzing information to identify hazard situations</td>
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<td>System of using past and current incident/accident information to predict causes of harm</td>
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<td>One or more of</td>
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<td>- Direct observation such as workplace inspections</td>
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<td>- Work method such as structured or unstructured discussions</td>
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<td>- Independent audits</td>
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<td>- Hazard studies</td>
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<td>- Prepare a list of items covering provisions, plant, people and procedures and gather information</td>
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<tr>
<td>d. Implementing and maintaining safety procedures and risk control measures</td>
<td>Dissemination of safety procedures and control measures</td>
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<tr>
<td>e. Review of safety procedures and risk control measures</td>
<td>Who has responsibility for redesigning and reviewing the systems?</td>
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Element 8

Hazard control programme – PPE programme

- A programme to identify hazardous exposure or the risk of such exposure to the workers and to provide suitable personal protective equipment as a last resort where engineering control methods are not feasible.

- Policy
- Identification of hazardous exposure
- Hierarchy of Risk Control Measures
- Provision of suitable PPE
- Planning of a PPE programme

<table>
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<tr>
<td>Personal Protective Equipment Program</td>
<td>Personal protection</td>
<td>System to assess whether PPE is required and what type is needed. Purchasing in compliance with legal requirement. Where PPE is provided there’s a system, which ensures it is maintained, worn and replaced. Provision of adequate training, information and instruction Monitoring the use of PPE</td>
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Element 11

Safety and health awareness

- Promotion, development and maintenance of safety and health awareness in a workplace

- Policy
- Planning for safety promotion programme
- Organizing
- Implementing
- Reviewing

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<tbody>
<tr>
<td>Safety Promotion Program</td>
<td>The organization’s commitment to OSH</td>
<td>Identified safety problems Clearly defined focus, themes and objectives</td>
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Element 12

Occupational health assurance programme

- A programme to protect workers from occupational health hazards

- Policy
- Planning for occupational health assurance programme
- Organizing, implementing and monitoring
- Training
- Health surveillance
- Reviewing

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<tr>
<td>Occupational Health Program</td>
<td>Occupational health hazards</td>
<td>Health risk assessment Special risk includes hazardous chemicals musculo-skeletal disorders noise vibration extremes of temperature, pressure and humidity stress inhalation – dust etc Health surveillance to provide a means of checking the effectiveness of control measures Providing feedback on the accuracy of the risk assessment and Identifying and protecting individuals from increased risk</td>
<td>Welfare Medical check</td>
</tr>
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</table>
Element 13
Evaluation, selection and control of sub-contractors
◆ to ensure that sub-contractors are fully aware of their safety obligations and are in fact meeting them
• An approach to manage sub-contractor
• Identification of suitable sub-contractors
• Planning
• In-house rules
• Monitoring and control
• Reviewing

Element 14
Accident control and hazard elimination - Process Control Programme – Process Control Programme
◆ A programme for accident control and elimination of hazards before exposing workers to any adverse work environment
• Policy
• Planning for process control programme
• Organizing
• Implementing
• Monitoring
• Reviewing

Process Control Programme
◆ process safety information
◆ process hazards analysis (risk assessment)
◆ operation procedures
◆ competency and competency of workers
◆ mechanical integrity (maintenance programme)
◆ safe systems of work
◆ Assessment of the task
◆ Hazard identification and risk assessment
◆ Definition of safe systems of work
◆ Implementing the system
◆ Monitoring