

# **Brown & Syme Holdings Ltd Safety System**

## **Policy & Planning**

## 1.0 POLICY & PLANNING

### 1.1 OVERVIEW

#### Purpose

To document the H&S Policy of Brown & Syme Holdings Ltd and to describe the actions required for implementing and reviewing both the policy and the Brown & Syme Holdings Ltd Safety System.

#### ACC WSMP Objectives

1. To demonstrate an active commitment to consultation and communication with employees on all matters of Health & Safety Management.
2. To demonstrate a systematic approach and a culture of continuous improvement by setting objectives and responsibilities for all aspects of H&S performance. Objectives to be regularly reviewed against targets.

#### Standard (Including Relevant Legislation)

- AS/NZS 4801:2001 Sections 4.2 and 4.3
- ACC WSMP Audit Doc, Issued 2002
- Health and Safety in Employment Act & Regulations

#### Procedure

1. Consultation - Brown & Syme Holdings Ltd is committed to consultation and cooperation between management and employees. The organisation will formally involve elected employee H&S representatives in any workplace change that will affect the Health and Safety of any of our employees.
2. Communication of the Policy - All personnel, including contractors, are to receive information about the H&S policy and procedures at induction and are to be provided with a written copy of the policy as part of the H&S Handbook.
3. Documentation and Document Control - For our procedures to be effective, all copies must be kept up to date. To ensure that this happens, the AS/NZS OH&SM Systems methodology for Document Control will be used for formatting and to issue any changes. All H&S Manual holders must ensure that when they receive updates they are promptly inserted into the H&S manual. **(Refer also Forms 45 – Records & Record Management & 46 – Document Control.**

Brown & Syme Holdings Ltd will establish, implement, and maintain information, in both print and electronic medium, to:

- Describe the core elements of the management system and their interaction; and
- Provide direction to related documentation.

Each documented procedure will contain the following:

- Standard header and footer containing procedure number and revision number.
- Each document will state date procedure is effective from, person authorising procedure, page number and numbers of pages.
- Authorisation by appropriate management level and Procedure Owner
- Purpose
- Relevant Standards and Legislation
- Operation of Procedure
- Audit Records
- Authorisation
- Responsibility

4. Annual Health Safety Systems Review - This policy will be reviewed annually, by the CEO, or designated senior manager, in conjunction with updating the H&S business plan with the H&S Committee. Management will also review annually, the overall performance of the OH&SM and Procedures, in consultation with the H&S Committee.

### **Audit Records**

- The current written and dated policy, signed by the CEO (or equivalent senior manager) and displayed in the designated areas
- This Policy & Planning procedure and the H&S Handbook
- Distribution lists for Policy & Planning procedure revisions (as part of H&S Manual)
- Health & Safety Responsibilities assigned and understood
- Health & Safety Business Plan & Objectives written

### **Authorisation**

The policy is signed by the CEO or designated senior manager.

### **Responsibility**

H&S Coordinator is allocated responsibility for the implementation of this procedure and monitoring its effectiveness by internal auditing.

## 1.2 HEALTH & SAFETY OBJECTIVES

1. To demonstrate an active commitment to consultation with employees on all matters of Health & Safety Management
2. To demonstrate a systematic approach and a culture of continuous improvement by setting objectives and responsibilities for all aspects of H&S performance. Objectives to be regularly reviewed against targets.

## 1.3 ACTIONS REQUIRED

- Sign and issue the H&S Policy and display widely. Policy to be reviewed annually
- Appoint a H&S Coordinator with a written job description.
- Confirm H&S Responsibilities and required competencies for all Managers and designated staff. Performance against responsibilities to be regularly reviewed. Ensure staff are aware of their responsibilities.
- Establish H&S Forum and involve employees in setting H&S standards and the internal auditing of Workplace Safety Management Practices. Establish and H&S committee.
- Set up and promote the use of a H&S reference library
- Promote all H&S activities by newsletter, posters etc
- Prepare an H&S Business Plan with clear objectives including:
  - Strategy for Minimising Risk by effective Hazard Management
  - Dates and methodology for twice yearly internal audit process
  - Specific Corrective and Preventive action(s) process (Continuous Improvement) for all deficiencies noted by internal audit (WSMP self- assessment)
  - How objectives will be achieved, with responsibilities designated and target date(s) for completion
  - Other matters may include targets, such as Reductions in injury rates and property damage rates or progressively reduce waste
- Develop a programme for the ongoing review/audit of our Health & Safety System

## 1.4 HEALTH AND SAFETY POLICY STATEMENT

The following is Brown & Syme's Health & Safety Policy Statement. It is also available in A4 format, **Form 001** which has been signed is displayed in the following areas.

- Cafeteria
- Warehouse (near paint stores)
- Reception
- In all Health and Safety kits on site

This policy is applicable to Brown & Syme Holdings Ltd employees, contractors, visitors, and the general public. It applies to all Brown & Syme Holdings Ltd operations and functions, including those situations where employees are required to work off-site.

### Policy Statement

- Brown & Syme Holdings Limited is committed to complying with the Health and Safety in Employment Act 1992 and any other relevant legislation, standards, regulations, codes of practice and safe operating practices as laid down in our Health & Safety Manual.
- Brown & Syme Holdings Limited is committed to achieving and maintaining a Healthy and Safe working environment for all employees and all other people affected by our business. We will minimise risk in all areas of our operations and advise all concerned parties of this Policy and Health & Safety procedures. It is a fundamental requirement of the company that the Health & Safety of all staff be treated equally to other operational requirements as an integral part of our business.

- All staff, management and contractors are accountable for the Health & Safety. Responsibilities include a commitment to the accurate reporting and recording of all accidents, incidents and injuries, high standards of housekeeping and hygiene, effective hazard management by eliminating, isolating or minimizing hazards, competency training, and emergency response.
- Management will consult with and encourage the full participation of all employees in all aspects of implementing and continuously improving our Health & Safety System and performance. All employees will be involved in setting Health & Safety standards in the internal auditing of Workplace Safety Management Practices. We expect everyone to accept the challenge of making our organization a Healthy and Safe place to work, for all our staff, visitors and contractors
- Brown & Syme are committed to achieving high standards of Health & Safety Management and pursuing an active rehabilitation program, to support the safe and early return to work of all injured employees.
- All Employees are required to make themselves familiar with the business Health & Safety System, and comply with its requirements. A complete list of employee duties is contained in the Health & Safety Handbook.
- This Health & Safety Policy will be reviewed annually.

## 1.5 HEALTH AND SAFETY POLICY

The primary responsibility for Health and Safety at Work does not rest with Government Authorities, but with those who create the risks and those who work with them.

It is the Management of Brown & Syme Holdings Ltd, as the employer, and all of as our employees, who together can make our workplace both Healthy and Safe. The Brown & Syme Holdings Ltd Safety System encourages us to work together to identify, assess, and control our workplace Health and Safety Hazards.

There are many different Health and Safety requirements and responsibilities under the current legislation, each of which is summarised below. A detailed list of responsibilities is contained in **Form 002**.

### Compliance

Our first objective is to achieve legal compliance by familiarising ourselves with the general requirements of:

- The Health & Safety in Employment Act;
- The HSE Regulations; and
- OSH Codes of Practice and any relevant industry standards, so that we can ensure that we are in compliance with them.

### Reducing Risk for Employees, Contractors and Visitors

To be successful in managing Occupational Health and Safety, we must implement "Safe Systems of Work" which will ensure legal compliance and reduce the level of Risk for Employees, Contractors and Visitors alike. The Brown & Syme Holdings Ltd Safety System is designed to eliminate all possible risk and effectively manage the remaining risk.

Safe Systems of Work is an integrated approach to Health & Safety, Hazard Management, and Risk Control. It consists of a simple 5-Step approach to managing all work tasks and associated hazards as follows:

- Identify the Hazards;
- Assess the Hazards; (Eliminate or Isolate)
- Define Safe Practices; (Minimise)
- Implement Safe Systems of Work; and
- Monitor the System

## **Brown & Syme Holdings Ltd Safety System**

Brown & Syme Holdings Ltd Safety System is designed as a 'Systems' approach to managing Occupational Health and Safety to ensure a practical approach to achieving legal compliance and reducing the risk of our operations.

Brown & Syme Holdings Ltd, as part of our commitment to improving the standards of Health & Safety, has produced this H&S Systems manual.

High standards of H&S Management are a vital part of good business practice together with high standards of Products and Customer Service. Apart from the legal requirement to comply with the Health & Safety in Employment Act, it makes good sense to have effective procedures to control all aspects of our business. All employees and contractors will be given training in these procedures.

## **Health & Safety System Administration**

We have appointed a Health & Safety Coordinator to administer the program and control all documentation. They will report to a senior Manager and act as secretary of the H&S Committee.

Duties of the H&S Coordinator include:

- Advises management on all Health & Safety issues and Safety System implementation.
- Advises/assists all Brown & Syme Holdings Ltd employees in H&S matters.
- Acts as Secretary to the H&S Committee.
- Acts as the internal auditor for the Brown & Syme Holdings Ltd Safety System. Manages the twice-yearly internal auditing program to check effectiveness of the H&S System. Following each Internal Audit, prepares a report with Corrective Action(s) listed for the formal Management Review by Executive Team.
- Maintains accurate H&S Records and reports monthly on H&S Performance to both management and employees.
- Works with both internal and external H&S Training Providers to ensure provision of Health & Safety training.
- Obtains specialist advice for managing specific hazards, where this competency is not available through internal staff. Specialist advice may include advice on hazardous substances, measurement of noise levels, assessment of workstations etc
- Arranges pre-placement health assessments and maintains Health records; ensures effective administration of Accident Compensation and Rehabilitation processes. Liases with external Health providers and acts as, or works with, the Brown & Syme Holdings Ltd Rehabilitation Coordinator.
- Assesses new plant and equipment for Health & Safety hazards.

## **Induction Training**

During a new employee's first week of employment, they will receive an overview of Health and Safety within Brown & Syme Holdings Ltd. Each line-manager is responsible for the successful introduction to the workplace of each new employee and to ensure that all relevant aspects of Health and Safety at Brown & Syme Holdings Ltd, as they impact on a new employee, are explained. New employees will undergo Induction training and be issued with a H&S Handbook.

## **Employee Involvement and Responsibilities**

### Health & Safety Committee

As part on an ongoing commitment to employee involvement in Health & Safety a Health & Safety Committee will be set up. The role of the Committee is "To assist Management to establish, maintain and evaluate the organisation's occupational health and safety system in order to ensure that the workplace is, so far as is practicable, safe and without risks to the health of employees."

### Duties of Employees

"Every employee shall take all practicable steps to ensure their safety while at work. This means they must ensure that no action or inaction that they take, whilst at work, causes harm to any other person." (Section 19 of the Health and Safety in Employment Act.) More information on employee duties can be found in the Employee Handbook.

### Employee Commitment - Actions & Activities

The Brown & Syme Holdings Ltd Safety System requires all employees to:

- Become involved in debating and formulating Health & Safety Policy and encourage others to do the same;
- Take action on any unsafe acts by contractors or other employees and do not ignore any situation which could lead to injury or damage to plant/equipment;
- Ensure high standards of housekeeping in your work area and be involved in carrying out Health & Safety Inspections;
- Investigate Accidents in your work area;
- Attend H&S Training and H&S Meetings; and
- Take part in Fire & Emergency Drills.

### **Employer Involvement and Responsibilities**

#### Employers' Duties (Includes Principals and Contractors)

All Employers have a general duty to take all practicable steps to ensure the Safety of employees while at work (this is set out in section 6 of the HSE Act). In particular, Employers are required to take all practicable steps to:

- Provide and maintain a Healthy and Safe workplace and facilities.
- Ensure that machinery and equipment in the workplace is designed, built, set up, and maintained to be Safe for all employees.
- Ensure that employees are not exposed to Hazards in the course of their work.
- Develop procedures for dealing with all work related Emergencies.

#### Management Commitment

- Health and Safety Management, as with all elements of management, must be driven from the top if it is to be successful.
- If applied systematically and thoroughly, the Brown & Syme Holdings Ltd Safety System and Processes will enable Brown & Syme Holdings Ltd to achieve both legal compliance and the standard required for ACC discount.
- Effective use of this H&S System, will lead to reduced operating costs, by reducing all injuries to people, as well as damage (\$ losses) to buildings, machines, equipment and materials.
- See also **Appendix 1** - Responsibilities for New Zealand Company Directors - requirements for a Due Diligence defence.

### **Issue and Promote the H&S Policy**

Implement Health & Safety Procedures, to achieve legal compliance and beyond this the proven ACC Workplace Safety Management Practices that are necessary to achieve an effective H&S Program. An initial target is to achieve legal compliance with the Health & Safety in Employment Act and Regulations and the ACC Safety Management Practices, Primary Level audit standard.

### **Assign specific H&S responsibilities to all Managers and key staff, to carry out all required actions and to promote H&S Policy and Program activities.**

Management position descriptions should include a performance review of designated H&S Responsibilities.

## 1.6 HEALTH & SAFETY MANAGEMENT GOALS

Brown & Syme management have committed to writing and promoting a Health & Safety Business Plan with specific objectives and a timetable for implementation. This plan is to be revised and issued annually. **See Form 003.**

**Note:** Where H&S plan objectives exceed delegated authorities, these plans/recommendations must be authorised by senior manager.

## 1.7 ANNUAL PROGRAM OF INTERNAL AND EXTERNAL AUDITS

Brown & Syme commits to carrying out an annual programme of auditing.

Each internal audit, (called an annual self-assessment by ACC), to be followed by:

- Corrective Actions - to minimise risk exposure; and
- Preventive Action - to reduce the likelihood of a recurrence.

External audits are to be carried out at an annual frequency, six months after the internal audit. Following this process, the annual H&S Business Plan and associated objectives will be updated and re-issued.

### Corrective Actions & Management Review

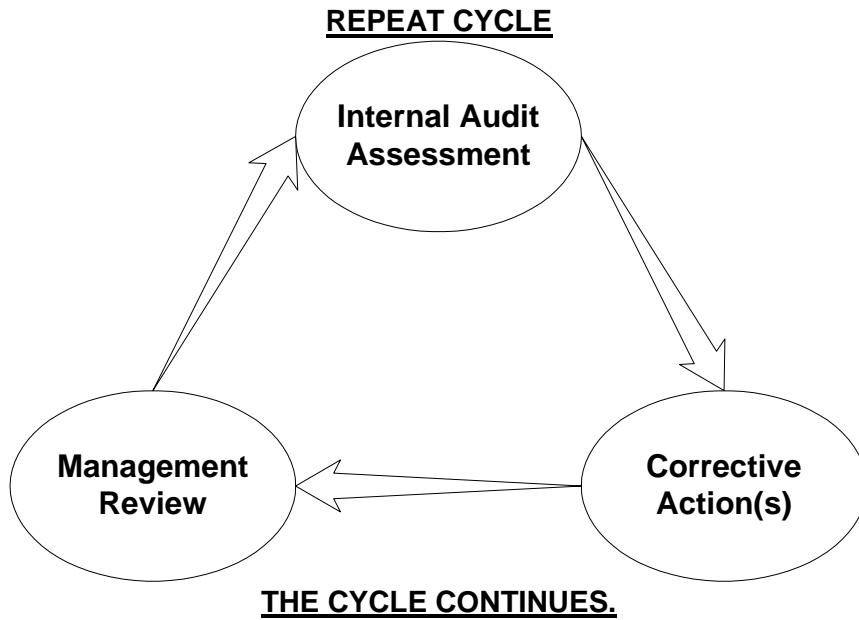
After each Management Review, the H&S Business Plan should be updated and agreement negotiated with the location or divisional Manager, to correct all the physical deficiencies and implement any other recommendations such as training and updating of procedures etc.

All relevant Health & Safety information will be displayed in all main work areas, lunchrooms and meeting rooms. Information will be on designated notice-boards, and changed and updated on a regular basis. Information will include H&S Committee minutes, Team meetings action minutes, and regular H&S Topics.

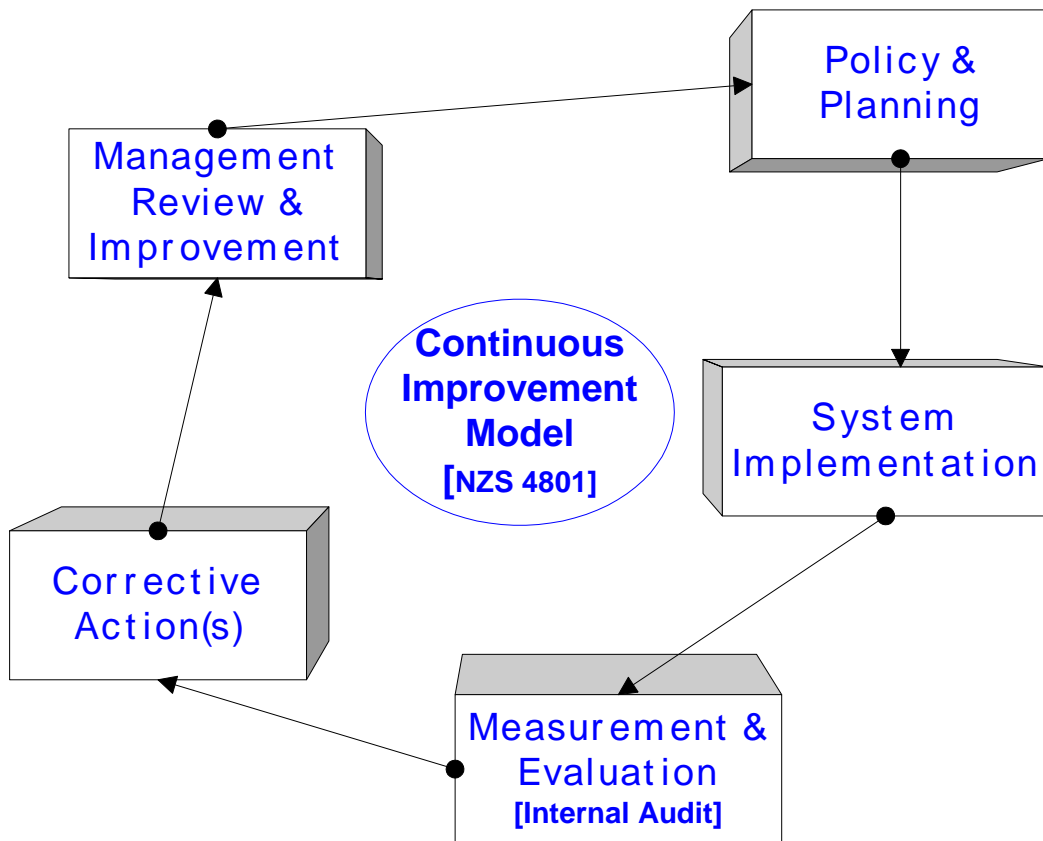
The three critical processes, once the H&S System is implemented, are:

1. Measurement & Evaluation (Internal Auditing)
2. Corrective Action
3. Management Review





***Safety System  
Implementation***



## **Appendix 1**

# **RESPONSIBILITIES FOR NEW ZEALAND COMPANY DIRECTORS**

### **Introduction**

The Companies Act 1993 has clarified a significant amount of previous confusion surrounding directors' duties and obligations.

The decision to accept a Directorship, or in forming your own limited company and becoming a Director, carries with it certain legal responsibilities.

Directors must act in good faith in the best interests of their company and carry out their duties diligently. Directors must also ensure that there is an effective system and processes for Corporate Governance and that they are informed as to the level of Risk that their company is exposed to. Below are some of the common risks exposures and following that is a Test of whether you have carried out **Due Diligence for H&S. How do you score?**

### **Typical areas of Risk that a company may be exposed to:**

- Failure to achieve Legal Compliance and to meet Regulatory Licensing requirements with possible resulting prosecution.
- Failure to provide effective Health & Safety systems to protect employees, visitors, contractors, and the public.
- Major injury or occupational illness liability, ACC claims liability, plus added risk of exemplary damages and Civil and/or Criminal Prosecution.
- Failure to implement and test an Emergency Response Plan.
- **Disaster potential includes:** Major fire, stock loss, structural collapse, and natural disasters - flood, cyclone, earthquake, volcanic eruption, tsunami etc.
- Failure to have in place a Disaster and Business Recovery Plan
- Failure to assess risks from public liability.
- Failure to manage assets effectively - unacceptable risk and treatment of fixed and liquid assets.
- Failure of any major System or Process.
- Failure to carry out effective Risk Assessment for new Products or Services.
- Failure to carry out effective Risk Assessment for new acquisitions, land, buildings, and/or plant.
- Failure to manage Indebtedness - limits on circumstances in which executive allow the organisation to incur debt.

### **Failure to have a Security System or Security System inadequate, with resulting potential for:**

- Robbery, Burglary, internal Theft, Fraud or Embezzlement.
- Vandalism or deliberate property damage and industrial espionage.
- Under Insurance/wrong cover for Risk
- Defective Products - design error, substandard quality control, inadequate testing.
- Deficient Services - corrective actions costs, reputation, lost customers.
- Interest rates, currency fluctuations, and share-market risks.
- Professional liability - giving wrong advice, negligence, design error.
- Employee relations disruption, strikes, go slows etc.

### **Computer System major malfunction due to:**

- Hardware or software failure
- Virus attack - internal or external (accidental or deliberate)
- Failure of Internet Security Firewall

## **DIRECTORS - WOULD YOU PASS AN EXERCISE IN "DUE DILIGENCE" FOR HEALTH & SAFETY IN YOUR COMPANY?**

### **Passing the "Due Diligence" Test for Health & Safety**

**In order to establish a Due Diligence defence it will be necessary to demonstrate:**

- The existence of a properly implemented Health & Safety System, designed to provide compliance with all applicable legislation.
- Identification of all Significant Hazards (with effective Risk Assessment process) and Hazard Control Plans implemented to minimise operational Risks.
- That the H&S system is activated and monitored by regular auditing.
- That there is a corrective action process followed by management review and sign-off.

### **This means:**

1. There must be **supervision of the Brown & Syme Holdings Ltd Safety System** at all appropriate levels.
2. It will also be necessary to **provide for periodic auditing and physical inspection** of key parts of the system.
3. Directors, Executives and Managers of Brown & Syme Holdings Ltd must be **actively involved in ensuring the H&S System works effectively**.
4. **Line-management** must report periodically, through to the CEO, on **the operation and effectiveness of the H&S System**.
5. Responsible **line-management** must be **instructed to report** as quickly as possible, through to the Executive and CEO, on **any significant matter of non-compliance and/or serious incidents**.
6. **Line-management** must also be instructed to **report all issues of concern** brought to their attention by anyone, either from Brown & Syme Holdings Ltd or externally and **specifically, concerns raised by regulatory authorities**.
7. There must be **documented competency training** of those staff involved in legislative compliance and an **appropriate division of responsibilities** to ensure that they can discharge their responsibilities effectively.
8. The H&S System must be sufficiently comprehensive, **to ensure compliance with both applicable legislation and H&S 'good practices'**  
**Note:** \*As required by the ACC Workplace Safety Management Practices Standard.
9. **Executives must be able to demonstrate an awareness of legal corporate governance issues, relevant standards and codes of practice**, of H&S Risks associated with their activities and their own undertaking, as well as an awareness of what other similar organisations do to control similar Risks.
10. **Executives must be able to demonstrate that they can and do react immediately** and personally if they are informed that the H&S System, or any sub-system, has failed.
11. **Executives must review any reports provided by officers of Brown & Syme Holdings Ltd, consultants, etc. with a critical eye.** Blind acceptance does not discharge your responsibilities.
12. **All efforts** by Brown & Syme Holdings Ltd, relevant line-management and their agents **must be fully documented**.

### **Three key points:**

1. It is important that the process of "all Practicable Steps," taken by the employer is capable of being proven.
2. It is not enough for an employer simply to assert verbally in court the steps taken.
3. This is when it becomes vitally important for the employer to be able to produce written results of all documentation, training and H&S process reviews.

An effective H&S System captures all H&S process improvements and actions taken.

### **"Due Diligence" must be ongoing, with the three critical components being:**

1. Regular and effective planned Internal Auditing;  
followed by:
2. Corrective Action and Preventive Action Processes  
followed by:
3. Regular Management Review of steps 1 & 2 and update/re-issue of the H&S Business Plan.