Environmental, Health & Safety

Management System Manual

Document Information

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# **1.0**Environmental Health &Safety Management System Requirements

## 1.1.0General Requirements

### 1.1.1 About Us

### Rabest Company Limited (RCL) shall establish, document, implement, maintain and continually improve its EHS management system in accordance with the requirement of OHSAS standard and ISO 14001 standard and determine how to fulfill these requirements.

Introduction of EHS Management system

1.1.2 Rabest is increasingly concerned with achieving and demonstrating sound environmental, occupational, health and safety (EHS) performance by controlling the impact of our activities, products and services on the environment as well as controlling our EHS risk consistent with our EHS policies and objectives.

1.1.3 This EHS manual describes our EHS management system and its related documentation that enables us develop and implement our EHS policy and objectives which takes into account legal requirement and information about significant environmental aspect and EHS risk.

1.1.4 This EHS management system has been established broadly in accordance with OHSAS 18001, ISO 14001 and legal and other applicable requirement to which RCL subscribes to.

1.1.5 The following pages outline what the system will cover, as well as describe some of the details relating to structures, policies and procedures that RCL will put in place to implement and maintain that system. It is however the intention that this EHS will be incorporated into the existing management system including quality management system.

1.1.6RCL is committed to continually improving this system and will do so through regular reviews, updates and feedback (plan, do, check and act).

### Scope

1.1.7This EHS system relates specifically to RCL operations within Ghana.

1.1.8 The scope of RCL EHS managements system includes: Road and building construction, import and export of general goods, distribution of general goods.

1.1.9The EHS include activities related to Top Management decisions, Management Review, Appointments or purchasing where it relates to RCL. This document will only cover those Environmental, health and safety responsibilities or duties on contractors, and suppliers where they are directly related to their activities for or on a product or service that impacts on anything relating RCL.

1.1.10The scope of the EHS will be reviewed annually at the management review. Implementation of any system changes will be the responsibility of the EHS manager.

## 1.2.0 Environmental Health & Safety Policy

1.2.1 RCL management will develop an integrated policy statement covering environment, health, safety and ensuring that it is appropriate to the nature scale and environmental impact of its activities products and services and associated EHS risks. In particular it will cover the environmental, health and safety risks associated with our actions and products as well as express our commitment to continual improvement and prevention of injury, and ill health.

1.2.2 RCL is a road and building construction, importand export of general goods distribution of general goods company working in Ghana and our policy expresses our commitment to comply with applicable legal requirements and with other requirements to which the organization subscribes which relate to its environmentalaspects, health and safety hazards.

1.2.3 Building on our commitment to continual improvement, our policy will provide the top-level framework for setting and reviewing health and safety objectives and targets and ensuring that our systems are documented, Implemented and maintained. The management of RCLwill ensure that the policy and the requirements and benefits of the systems are periodically reviewed and communicated to all persons working for or on behalf of Rabest Company Limited (RCL).

1.2.4 Our policy will be available to the public through RCL website.

1.3Planning

### 1.3.1 Environmental Aspects, Hazard Identification, Risk Assessment and Determining Controls,

1.3.1.1 RCL shall establish, implement and maintain a procedure that clearly defines the process for identifying the environmental aspects, hazard identification, assessment of risk, and determining of necessary controls.

1.3.1.2 The procedure shall specify what methodologies shall be used, when they shall be used, and who has responsibility for compilation, to ensure the process takes into account the human factors (behavior and capabilities), determined significant environmental aspect is proactive rather than reactive, follows the hierarchy of controls and covers both routine and non-routine activities.

The primary procedure will be:

* Risk Assessment

1.3.1.3This policy will cover both routine Risk Assessment, as well as specialist assessments such as Manual Handling, Environmental Risk assessment, PPE, DSE, etc.

However, as this subject is fundamental to EHS and covers all categories of personnel, the infrastructure, equipment as well as the workplace, certain identified and recognized hazards have lead RCL to determine controls should be implemented through the compilation of separate policies such as:

1. Business Continuity
2. Contractor Management
3. Control of Visitors
4. Workplace Management
5. Equipment Maintenance
6. alcohol and substance
7. pre-employment checks and competency requirements
8. medical fitness
9. control fatigue
10. Emergency Response/Evacuation Plan or Procedure

### 1.3.2 Legal Obligations and Commitments

1.3.2.1 RCL will identify its legal obligations and commitments which are applicable to the company and its operations in the country, and how they apply and are communicated to all relevant persons. This will be achieved by means of a Register.

1.3.2.2The management of this Register and guidance on the communication methodology will be detailed in the policy:

Legal Obligations and Commitments of records will be documented.

### 1.3.3 Objectives, Targets and Programs

1.3.3.1 RCL shall establish and maintain documented environmental health and safety objectives which will be measurable, have designated responsibilities and defined time frames for each item.

1.3.3.2 When establishing the objectives they will include the commitment to the prevention of pollution, injury and ill health, together with compliance to all applicable legal requirements.

1.3.3.3 In support of RCL commitment to objectives and targets suitable implementation programs will be agreed and periodically reviewed in line with the relevant policies.

## 1.4Implementation & Operation

### 1.4.0 Resources, Roles, Responsibility and Authority

1.4.1.1 RCL shall take ultimate responsibility for EHS and will ensure that resources are available to establish, implement and maintain them.

1.4.1.2Roles, responsibilities, accountabilities and delegated authorities will be defined, allocated, documented and communicated to staff via a combination of Job Descriptions, Policies such as alcohol and substance abuse, pre-employment checks and competency, medical fitness and fatigue control;Procedures such as emergency response and evacuation, reporting, investigating and recording; and associated documents.

1.4.4.3 The Management of RCL shall be responsible for ensuring the EHS is implemented and maintained and in particular that environmental, health and safety management is undertaken as an integral part of each and everyone’s role.

1.4.4.4 A member of the management team will be given specific responsibility for occupational health and safety to ensure that they report to the Board on the performance of the EHS.

### 1.4.2 Competence, Training and Awareness

1.4.2.1 RCL shall ensure that all Directors, management, operatives, suppliers and contractors are aware of theEnvironmental, Health and Safety Policy Statement and the need to conform to its tenets.

1.4.2.2 RCL employees (and relevant contractors) that have the potential to cause an impact on environment, health and safety shall be made aware of such.

1.4.2.3 RCL shall ensure they have the education, training, experience and other qualities to ensure that they are competent to manage that role.

1.4.2.4 RCL will undertake and update a training needs analysis and maintain appropriate training records as defined in the Training Policy. Training documents include:

#### • Training Needs Analysis Matrix

#### • Individual Employee and Contractor Training Records

1.4.2.5 RCL shall ensure that all employees and relevant contractors are made aware of:

1. The consequences of their work activities and behaviors as well as the benefits of improved personal performance, as regards EHS.
2. Their roles and responsibilities of conforming to the relevant requirements of the EHS.
3. The potential consequences of departures from the EHS and in particular task procedures.

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### 1.4.3 Communication, Participation and Consultation

###### 1.4.3.1 Communication

RCLrecognizes the importance of effective communication and will establish and implement a system for:

1. Appropriate inductions when first arriving at the premises.
2. Internal communication regarding EHS matters between the functions and management levels within the company as well as communication with contractors and other visitors to the company.
3. Receiving, documenting and responding to EHS communication from stakeholders and interested external parties.

1.4.3.2Management of communications both internally and externally will be detailed in the Communications policy:

Communications and interactions with local communities and other interested parties will be recorded on a communications record and a register maintained:

#### • Communications Register; and

• Communications Record.

##### 1.4.3.3 Participation and Consultation

RCL shall establish an EHS committee to ensure there is an effective system for worker participation, particularly Safety Representatives and consultation with all matters related to environmental health and safety. Contractors regularly employed on site will also be given an opportunity to participate within this forum.

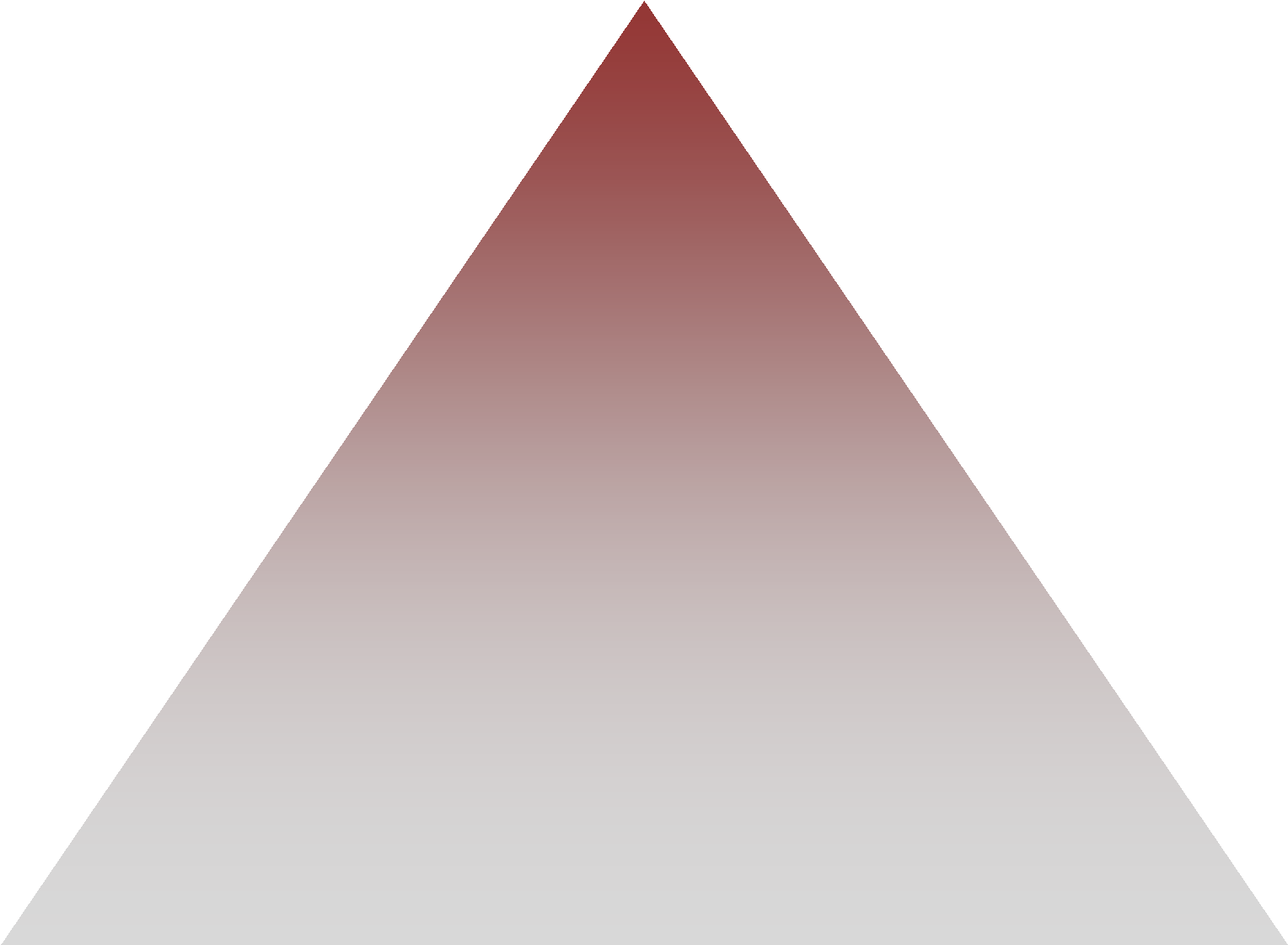
As this will be Integrated Management System it is intended that the environmental, health and safety committee and itsmanagement will be detailed in the Communications Policy.

1.4.4 Documentation

This EHS will be developed by RCL in general accord with BS OHSAS18001:2007 and as previously stated will be incorporated into an Integrated Management System. The IMS structure will include:

1. An Environmental health and safety policy statement incorporating quality standards;
2. A description of the scope of the integrated system in relation to RCL operations;
3. A description of the main elements of the EHS management system and their interaction and reference to related documents;
4. Documents including records, required by the OHSAS Standard and
5. Documents, including records, determined by RCL to be necessary to ensure the effective planning, operation and control of processes that relate to occupational health and safety risks. The RCL EHS documentation structure is described below:

Three Tiers of EHS Documentation



TIER1

EHSPolicyStatement

EHSSystem Registers

TIER2

EHSManagement Policies

EHSSystem Procedures&Management Documents

TIER3

EHSManagement Plans(e.g.Emergency)

Task ProceduresincludingSafe Systemsof Work

Tier 1 – The EHS Policy Statementand the Required Registersare in Tier 1 due to their relative importance to the documented system and EHS management planning.

Tier 2 – Includes the EHS Policies and Proceduresand Management Documents. The system policies and procedures are made up of both mandatory requirements of the standard as well as RCL methodologies and systems for consolidating, communicating and implementing relevant EHS legislation.

EHS Management Documentsare all the Information Sheets, Forms, Logs, Lists, Reports, Questionnaires, Programs and Templates needed to support the above system and the EHS in general.

Tier 3 – Includes dedicated overarching EHS Management Plans such as Emergency Plans which in this case will also cover maintenance requirements in one combined document.

It also includes more detailed Task Specific Procedures which will include Safe Systems of Work where there is a hazard identified by the risk assessment.

As this will be an Integrated Management System it is intended that the Task Procedures will also cover any Environmental hazards and control measures identified, along with any quality requirements so operatives only have one document to refer to for that element of the activity, thus reducing overall risk and improved compliance.

It also contains any records as required by the EHS standard and relevant legislation.

### 1.4.5 Control of Documents

1.4.5.1 Documents required by the EHS management system will be controlled.

1.4.5.2 Records are a special type of document and will be controlled in accordance with the requirements given in 4.5.4.

1.4.5.3Details of how this process will be managed can be found in the Control of documents procedure.

### 1.4.6 Operational Control

1.4.6.1 Where significant environmental aspect identification, hazard identification and risk assessment process has determined the need to implement operational controls to manage the EHS risks RCL will introduce one of two systems to ideally eliminate or reduce the risk to an acceptable level.

1.4.6.2 Where the principal issues are common across the operation QCS will establish,implement and maintain tier 2 policies, procedures and or tier 3 EHS Management Plans to manage recognized significant environmental aspects, hazards and activities the same way across our operations.

1.4.6.3 Examples of these are below:

1. PPE
2. Control of Visitors
3. Workplace Management
4. Mobile Mechanic

1.4.6.4 Where the activity is task specific management of RCLto ensure documented procedures (which include Safe Systems of work where a significant environmental hazard has been identified and explicitly stipulate the operating criteria) are produced, implemented and maintained to cover situations where their absence could result in a deviation from the EHSpolicy, objectives and targets or lead to an incident.

1.4.6.5 Operational control of goods and services used by RCL and provided by external contractors and suppliers is covered by the following policies:

1. Contractor Management
2. Purchasing

### 1.4.7 Emergency Preparedness and Response

1.4.7.1 RCL will establish, implement and maintain a procedure that requires management to identify potential emergency situations and potential accidents.

1.4.7.2 The policy will also require the compilation of a suite of procedures detailing how the company will respond to emergencies, preventing or mitigating any adverse EHS consequences.

1.4.7.3 This will be the Emergency response plan which will also contain those procedures required by the Environmental Management System on this subject.

1.4.7.4 The policy will also cover the emergency equipment and training requirements, as well as the testing regime and review process to ensure the plan remains effective.

1.5Checking

### 1.5.1 Performance Monitoring and Measurement

1.5.1.1 RCL shall establish, implement and maintain a procedure that requires the management team to monitor and measure EHS performance.

1.5.1.2The policy defines the type of monitoring required, the methods of measuring, recording and reporting as well as the frequency.

1.5.1.3 The process will

1. assist in monitoring conformity with the objectives and targets,
2. assist in monitoring the effectiveness of controls for environment, health as well as safety,
3. provide both proactive and reactive measures,
4. cover incident management as well as ill health,
5. Provide a process for identifying subsequent corrective and preventive action and analyzing all.

### 1.5.2 Evaluation of Compliance

1.5.2.1 RCL will ensure that a compliance review of the legal obligations and commitments is carried out on an annual basis.

1.5.2.2 It is the responsibility of Senior Management to ensure that these reviews are undertaken and recorded.

1.5.2.3 The compliance review includes an evaluation of compliance against the Register of Legal Obligations and Commitments.

1.5.2.4 Records or evidence to support any compliance decision or summary of changes will be recorded in the register and provided for the management review meeting as detailed in the procedure:

#### 

### 1.5.3 Incident Investigation, Nonconformity, Corrective Action and Preventive Action

##### 1.5.3.1 Incident Investigation

In conjunction with the Emergency Preparedness and Response policy RCL will establish and implement a policy/procedures for dealing with incidents including near misses. The policy will require incidents to be investigated in a timely manner, identify the root causes and corrective and preventive action, as well as opportunities for continuous improvement. The policy will also define the recording, reporting and communication processes. As this will be an Integrated Management System this will be a combined policy and system covering the EHS. This is detailed in the policy:

•Incident Management

##### 1.5.3.2Nonconformity, Corrective Action and Preventive Action

Throughout the EHS the need to identify and correct non-conformities will be defined in various policies and procedures. However RCL will establish and implement overarching policy/procedures for dealing with potential and actual nonconformities and taking appropriate action which these other systems will have to conform to.

As this will be an Integrated Management System this policy and system will cover health, safety, environmental and quality requirements. Overall performance will be monitored as defined in 4.5.1. Full details can be found in the policy:

#### • Performance Assessment, Improvement & Review

### 1.5.4 Control of Records

1.5.4.1 Throughout the EHS the requirement to maintain records will be specifically defined in the policy related to that subject. However the policy/procedures below will specify that records must be legible, identifiable and traceable. It will also define the retention periods, the retention location and any documentation numbering system.

1.5.4.2 As this will be an Integrated Management System this policy and system will cover health, safety, environmental and quality requirements.

Details of how this process will be managed can be found in the document control policy and associated procedures.

• Document Management

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### 1.5.5 Internal Audit

1.5.5.1 RCL will ensure that internal audits of the Integrated Management System are conducted in accordance with the policy below. The policy will define the process of setting the scope and frequency of audits as well as the competence and impartiality of auditors.

1.5.5.2 The audits will determine whether the environmental, health and safety elements of the management system conform to planned arrangements, they have been properly implemented and are being maintained.

1.5.5.3 The lead auditor will provide the results of the audit to the management team.

## 1.6Management Review

1.6.1 RCL management will review the environmental system element health and safety management system elements through a combined management review process.

#### • Performance Assessment, Improvement & Review

1.6.2 A record of the management review meeting and any outcomes will be recorded and communicated as defined in the policy.

EHS statistics for the past 3years

|  |  |  |  |
| --- | --- | --- | --- |
|  | **2013** | **2014** | **2015** |
| Number of Incidents | 2 | 2 | 1 |
| Number of Vehicular Accident | 0 | 0 | 0 |
| Number of First Aid Cases | 1 | 2 | 3 |
| Number of Lost Time Injuries | 6hrs | 4hrs | 2hrs |
| Number of Medical Treated Injuries | 0 | 0 | 0 |
| Number of Fatalities | 0 | 0 | 0 |