

Title:	Environmental, Health and Safety (EHS) Manual	
Document Type:	Work Instructions	
Document Number:	EVCHSE-0019	Revision Number: 11

1.0 OVERVIEW

This document describes the systems and resources provided for the assurance of safety for all employees of European Vision Centre (EVC).

2.0 EHS FUNDAMENTALS

By incorporating EHS into our system of work, we will achieve healthy lifestyles and an injury/illness-free workplace.

EHS cannot be separated from performing tasks. It is through mistakes and omissions or oversights that injuries/illnesses occur. EHS is incorporated in all aspects of work carried out at European Vision Centre in decision making, in purchasing, in design and the execution of work.

At EVC:

- The management is committed to Health and Safety of its personnel and the protection of the Environment;
- All injury/illness can be prevented;
- Nothing is so important that cannot be done safely.

As an EVC based person you must:

- Be competent and authorized to perform your tasks;
- Be fit for work and unaffected by drugs and alcohol;
- Be informed about the risks associated to your tasks and that they have appropriate control in place;
- Have the right tools and equipment and ensure they are in good condition;
- Wear and use PPE that is appropriate for the task and conditions;
- Communicate any injury immediately to your direct supervisor;
- Allow the early recognition of illness and disease by communicating any symptoms immediately to your supervisor;
- Understand whether a permit to work is required, before commencing task if in doubt ask your supervisor;
- Know what to do in an emergency;
- Intervene when you see an unsafe act or condition.

If the task or circumstance in which you are working change – Stop what you are doing and reassess the task immediately.

3.0 RESPONSIBILITIES

Assignment of Responsibility.

The co-operation of all levels of employees is required to ensure a safe place of work is established and maintained. The allocation of duties for safety matters and particular arrangements to implement the policy are outlined below:

3.1 Employers Obligations

The Management of Health and Safety at Work Regulations and Warehousing and Storage, stipulate requirements to ensure the safety, health and welfare of employers whilst at work. In summary these are:

- Provide a Health and Safe Place of Work;
- Implement Safe System of Work;
- Employ competent staff;
- Provide Information, instruction supervision and training;
- Prepare and update Health and Safety arrangements;
- Identify Hazards and Assess the risks in the workplace.

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3.2 Employees Obligations

The Management of Health and Safety at Work Regulations and Warehousing and storage, stipulate requirements for employees whilst at work, these are:

- To take responsible care for the health and safety of themselves and others who maybe be affected by what they do, or fail to do at work;
- To co-operate with the employer so far as it is necessary to enable the employer to comply with their statutory duties;
- Not to intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety or welfare;
- To comply with the policy, procedures, instructions, rules and standards developed by the company for health and safety;
- To report all accidents/near missies and ill health to their departmental manager as soon as practicable and participate in the investigation process;
- Not to use plant or equipment if they are not authorised, trained or experienced in the operation and use of that piece of plant or equipment, nor use it for any purpose for which it was not designed;
- Not to use any item of plant or equipment (including PPE) identified as damaged or faulty. Damaged or faulty plant or equipment must be reported to the departmental manager;
- To report any hazards identified, or additional risks to health and safety that have not been eliminated, or adequately controlled;
- To wear the appropriate personal protective equipment as and when required by the company safe system of work;
- Make suggestions to improve health and safety at the workplace using the Good Saves scheme where possible.
- Actively participate in department health and safety activities;
- Know the procedures to follow in the event of any emergency situation;
- Do not work whilst under the influence of alcohol, drugs or medication which may impair judgment which could affect own safety and safety of fellow employees.

3.3 Site Lead

EHS begins at senior management level and so the overall responsibility for the establishment and maintenance of an effective policy for Environment, Safety, Health and Welfare at Work rests with the site Lead. The responsibilities of the site Lead includes the following:

- To ensure, in so far as is reasonably practicable, the safety, health and welfare at work of all employees and contractors;
- Ensure that a general health and safety policy statement is available, as required by Management of Health and Safety at Work Regulations and Warehousing and storage Regulations.
- To show commitment to the EHS Policy by signing this document;
- To provide sufficient resources to allow the effective management of EHS on site;
- To appoint competent persons within the company – which includes representative(s) of site EHS department and managers – to be responsible for implementing the EHS Policy;
- Ensure that all staff under their control are held accountable for their performance in relation to EHS.
- To ensure that directors/managers and supervisors who have, or will be appointed, have the necessary competence and have, or will receive the requisite information, instruction, training and experience to undertake their responsibilities in an adequate manner;

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- Ensure that disciplinary procedure exists for willful breaches of health safety standards;
- Recognise and reward environmental, health and safety activities and good safety performance;
- To ensure implementation of safety procedures, guidelines and standards;
- To evaluate employee compliance and enforce established health and safety procedures and rules.

The Site Lead shall conduct an annual review of EHS performance, management systems, policies, procedure, health initiatives, the annual MAARS self-assessment and approve the goals and objective for the upcoming twelve months.

3.4 Managers

Managers are responsible for ensuring that the EHS is effectively communicated at all levels and is observed at all levels by:

- Ensuring at all times that competent staff and appropriate material are available to meet regulatory requirements;
- Ensuring that employees under their control and others including contractors, the public, visitors, are made aware of and comply with site's health and safety procedures and rules;
- As part of this requirement managers may be appointed as Health and Safety Process Owners to lead specific health and safety procedures, with assistance available from the EHS department;
- To carry out EHS inspections in accordance with site's procedure;
- Ensuring that throughout the organisation, the visible and active leadership of managers and Shift Managers at all levels to develop and maintain a culture supportive of effective environmental, health and safety management;
- Actively support the company's EHS policy by providing the necessary resources and giving equal emphasis with other functions such as processes, cost and quality;
- To ensure incident investigations are carried out on all accidents, including near misses where the risk of an accident was high, to the determine root cause, and ensure that corrective actions are implemented to prevent re-occurrence;
- Maintain premises and equipment in accordance with established health and safety standards;
- To ensure that all supervisors and employees under their control receive all necessary information, instruction, training and supervision to establish employee competence in relation to their specific work activities and responsibilities;
- To make sure that all relevant information on health and safety issues is communicated to the workforce by cascading the information through the line management;
- To understand the health and safety policy and their responsibilities under legislative requirements;
- Ensuring that contractors under their control are familiar with the company contractor health and safety management standards.

3.5 Supervisors and Shift Managers

Shift Managers and Supervisors are responsible for ensuring that the safety statement is effectively communicated at all levels and is observed at all levels, their responsibilities include:

- To understand the health and safety policy and their responsibilities under regulatory requirements;

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- Ensuring that employees under their control and others including contractors, the public, visitors, are made aware of and comply with site's health and safety procedures and rules;
- Ensuring that throughout the organisation, the visible and active leadership of managers and supervisors at all levels to develop and maintain a culture supportive of effective environmental, health and safety management;
- Ensure that employees within their department receive all necessary information, instruction, training and supervision, especially induction training for new starters;
- Identifying training needs and ensuring that employees receive refresher training as identified within the departmental training matrix;
- Ensuring that all plant and equipment within their area of responsibility is maintained in good working order with a maintenance log kept;
- Ensuring that emergency arrangements are established within their area of responsibility and are known by all employees who work there;
- Evaluating employee compliance and enforcing established health and safety procedures and rules;
- Participating in health and safety monitoring, review meetings and auditing procedures when requested to do so by the EHS Department;
- Communicate all EHS issues to employees under their control;
- Investigate all accidents and near misses in a timely manner and to implement any necessary controls to prevent re-occurrence organisation;
- Encouraging employee participation in the consultation process within the organisation;
- Ensuring that good housekeeping standards are maintained and in particular that fire exits routes are kept clear;
- Providing regular health and safety communications to all employees in their area.

3.6 Site EHS

The site EHS has the following responsibilities:

- Provide advice, guidance and instruction on all EHS matters to management and all Company employees (including where applicable to sub-contractors, suppliers and visitors to the organisation);
- Responsible for bringing the EHS policy and individual roles and responsibilities to the attention of all management and employees;
- To carry out, or to arrange to have carried out, risk assessments, inspections in accordance with the HSE requirements;
- To keep management abreast of current Environmental, Health and Safety legislation;
- Oversee an independent legal compliance audit every 3 years;
- To address all potential and known items that may develop into an EHS nonconformance in a timely manner, ensuring the risk posed to both staff and the business is minimised and measures implemented to prevent a reoccurrence;
- To ensure that suitable and sufficient assessments are carried out for all work activities with records maintained for significant hazards that have been assessed;
- Provide technical and managerial support to the organisation in maintaining compliance with EHS policy, procedures and regulatory requirements and in the establishment of local EHS programs;
- Provide training to employees in health and safe-work procedures and specific health and safety subjects;
- To measure EHS performance and hold persons accountable for activities and results;
- Ensure that accidents, incidents and near misses are investigated to determine root cause, and that corrective actions are taken;
- Procure the resources necessary for implementing the Site EHS Programs;

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- To seek, where necessary, the services of a competent person for the purpose of ensuring health and safety of employees;
- To advise and support area managers in the setting of internal company EHS standards;
- Order work to stop if of the opinion that any activities represent a risk of personal injury/illness to persons in that area.

3.7 Occupational Health Medical Advisor/Provider

The Occupational Health Medical Advisor/Provider (OHMA/P) working with site human resources responsibilities include:

- To work within environmental safety and health management system;
- To provide ongoing care to employees through health surveillance, health promotion, rehabilitation and management of health and safety;
- Working to ensure professionalism, quality and legal compliance in the Occupational Health Practice;
- Injury/Illness case management;
- In addition to providing treatment, follow-up and referrals, and emergency care for job related injuries and illnesses; the OHMA/P will act as gate-keeper for health services, rehabilitation, return to work and case management issues;
- Counselling and crisis intervention;
- They will assist in referrals and coordinate any follow up care;
- Health Promotion;
- Develop Health Education Programmes that encourage employees to take responsibility for their own health. Smoking cessation/Exercise/Fitness/Nutrition and Weight Control/Stress Management/Control of Chronic illnesses and effective use of Medical Services are just a few of the Preventive Strategies to keep Workers healthy and productive;
- Assist in maximising employee productivity and reduce costs through lower disability claims, fewer on the job injuries and improve absentee rates.

3.8 First Aid

First Aid facilities and qualified trained personnel are available in accordance with the Management of Health and Safety at Work Regulations and Warehousing and Storage to render treatment and maintain required records.

First aid is the approved method of treating a casualty until they are placed, if necessary in the care of a doctor or removed to hospital. First aid treatment is given to a casualty to:

- Sustain life;
- Prevent his/her condition from becoming worse;
- Promote recovery.

3.9 Contractors and self-employed persons

When it is necessary for external contractors and self-employed persons to work at EVC premises the company has drawn up a comprehensive work and safety policies and procedures for such contractors. It is clearly specified that adherence to these rules is imperative, and deviation may result in the termination of the contract/service agreement.

We believe that safety is an important component of every job, operation and process. It is therefore required that any work performed by contractors (or their sub-contractors or suppliers) on our premises will be conducted according to the standards as outlined in the Contractor Manual.

The contractor (sub-contractor or suppliers) shall be responsible for initiating, maintaining and supervising all safety controls and programs in connection with their work. Violations of

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safety and security rules by contractor employees or associates could result in the responsible individual(s) being asked to leave the facility.

All contractor activities must comply with the current revision of [EVCHSE-0012](#).

Any employee who brings contractors on-site must comply with the current revision of [EVCHSE-0012](#).

Department Managers must ensure employees in their area with responsibility for contractors are familiar with requirements of the current revision of [EVCHSE-0012](#).

3.9.1 Site and Building Access

Prior to commencement of operations on site the contracting company must provide a complete list of employees and sub-contractors employees it proposes to bring on site. All contractors are required to complete the site EHS Induction. Upon completion of the site EHS Induction, ccontractors will be issued with a site pass. An EVC pass is required for every contracted employee working on site. All contractors must sign-in/sign-out on a daily basis when entering and leaving the property.

A temporary visitor's pass will be issued to short term contractors who must be supervised at all times while on site. Identification badges must be worn and be clearly visible at all times while on site. Unauthorised use of the badge (i.e. giving it to another person to use) is strictly prohibited. Lost or stolen badges must be reported to security/reception immediately.

3.9.2 Responsibilities

EVC have assigned Contractor Administrators, who liaise with the contractors in relation to the Contractor EHS Guidelines. Each Authorised Person must ensure that any contractor working for them, or within their area of responsibility, follows these guidelines.

In addition, it is the responsibilities of each Contractor Administrator to ensure that all their ccontractors details are held an on-site file containing applicable EHS and training records, for each inducted ccontractor employee working on site. The contractor has a responsibility to inform the Contractor Administrator of any deviations from the original contract plan.

Each contractor is responsible for their own safety and that of their fellow colleagues. Contractor companies are responsible for informing their employees and their sub-contractors/suppliers employees and any other outside personnel of the EHS Requirements and all regulatory requirements for work on site.

3.10 Visitors

All visitors to EVC must identify themselves on arrival at reception and must be accompanied for the duration of their visit.

All visitors are provided with a site pass which will allows them access in and out of the facility and accountability in the event of an evacuation. Each visitor is provided with Form Control No. [EVWA-0125](#) which outlines critical emergency response procedures to be followed in the event of an evacuation.

It is the responsibility of all company employees to ensure the safety of their visitors on the premises. All visitors to the company premises, including sales people, consultants, inspectors, etc., are bound by the following rules:

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- All visitors must check in at reception and the responsible employee (person whom they are visiting) must be aware of their whereabouts at all times;
- They should observe the Company EHS Rules and any instructions given by Company personnel.

3.11 Disabled persons on site

When a disabled person is working on site or visiting the site they should be assigned a help assistant that will be in close contact with that person through the time they spend at EVC.

The help assistant will ensure that the disabled person can carry out their tasks in full without over exertion and ensure the disabled person safe evacuation from the building in the event of a plant evacuation.

If possible all disabled person should carry out their duties on the ground floor and if there is requirement for the disabled person to work on the 1st or 2nd floor there is a EVAC Chair located in the first aid room that should be used by able body persons to transport the disabled person up and down the stairs when required.

4.0 HEALTH AND SAFETY CONSULTATION

The Management of Health and Safety at Work Regulations and Warehousing and Storage provides for consultation between employers and employees to help ensure co-operation in the prevention of accidents and ill health at work.

The purpose of the EHS Focus Group is to bring all employees together to achieve and maintain a safe, healthy workplace. The goal of the group is to promote and develop safety at work and eliminate workplace injuries and illnesses.

The EHS Focus Group Mission: To be a dynamic group, capable of developing sustainable EHS solutions to assure a safer and healthier environment to all people within the European Vision Centre (EVC).

The group main responsibilities are:

- Involve employees in achieving a safe, healthful workplace.
- Participate on safety-related injuries, illnesses and near misses investigations;
- Participate on site's risk assessment and audits on request;
- Provide inputs to improve workplace safety and health to the management;
- Lead and support site's EHS programs.

The group represents employees from each department and management. Employee representatives can volunteer or their peers can elect them. Each representative will serve a continuous term of at least one year.

5.0 EHS TRAINING

The EVC site is committed to providing information, instruction, training and coaching as is necessary to ensure safety and health at work. The primary responsibility rests with management in cooperation with the site EHS as appropriate and the company expects that all employees will cooperate and attend the training provided.

All employees and contractors receive induction training. The type of training received will depend on the job specification or works being carried out, but it will include some general knowledge about the organisation and general site EHS procedures/rules.

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Induction training is provided to all new starts, the induction covers the following topics:

- Fire and emergency response procedures;
- Emergency response telephone numbers;
- First Aid and accident procedures;
- Good Saves (near miss and hazards) reporting;
- Hazards in the work place;
- Ergonomics;
- Personnel Protective Equipment (PPE);
- Housekeeping;
- Employer and employee Responsibilities.

Based on the new starter role the EHS training will involve, but it's not limited to the following:

- Safety Awareness Training
- Electrical Safety and Policy
- Lock –Out/Tag- Out procedure
- Hazardous Energy Control Procedures (HECP)
- First Aid and Fire Marshal
- Chemical Handling and Disposal
- Ergonomics
- Manual Handling
- Visual Display Unit
- Powered Industrial Vehicle
- Working at Height
- Machine Safety
- Slips Trips and Falls
- Permit to Work System

The role and behavior of employees is critical to the achievement of a “free accident work environment”.

6.0 OFFICE SAFETY

All employees shall, conduct themselves in a safe and healthy manner in accordance with this procedure and with all local, legal and Johnson & Johnson requirements. The site EHS shall identify and control all significant safety risks relevant to the location. Generally the most common office-based hazards are: slips, trips and falls, struck by and against objects (causing cuts and bruises), ergonomics hazards, fire and emergency evacuation, and computer work stations arrangements.

6.1 Housekeeping

To avoid collisions, trips and slips, all internal walkways shall be outlined, free from obstructions, surface defects and litter. Attention shall be given to the following:

- Spills shall be cleaned up or cordoned off immediately;
- Damaged floor surfaces such as warping tiles, worn spots in the carpet, etc., shall be reported to the facilities department immediately for repair. The damaged areas shall be effectively cordoned off;
- Aisles, walkways and stairs shall be kept free from boxes, chairs, and other obstacles that impede traffic;
- Electric and telephone cables shall be arranged so they do not pose a tripping hazard;
- Desks shall be kept tidy and organized at all times.

6.2 Fire Safety

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- The use of electric space heaters in the office shall be avoided. If used, they shall be located at a safe distance from combustible materials and PAT tested;
- To prevent over-heating, vents for heat generating office equipment such as visual display units (VDUs), copying machines, etc. shall not be blocked;
- Overloading of power sockets can lead to overheating and fire. Only fused extension leads will be used where necessary;
- All fire exits shall be clearly marked with exit signs. Fire exit signs shall be visible at any location in the office. All fire doors shall be kept closed in order to prevent the spread of fire and smoke during a fire;
- Unsafe electrical cords and faulty electrical equipment shall be reported promptly to the facilities / engineering department;
- Power supply for electrical equipment via trailing cables or extension cords shall be minimized where possible;
- Except for equipment that shall always be turned on, (e.g., fax machines, refrigerators, etc.), all other equipment shall be switched off at night.

6.3 Proper Working Postures

Office jobs usually involve long periods of sitting, writing, reading, operating VDUs, etc. Improper working postures create various physical problems such as neck and back pains, other musculoskeletal problems, varicose veins, etc. These types of health problems are common to office workers. The following guidelines help to reduce these problems:

- The workstation shall be properly laid out so as to minimize the physical stresses;
- Seating posture is critical in reducing problems caused by long periods of sitting;
- Chairs shall be comfortable to sit in for substantial periods, and shall be adjusted to fit the user;
- All employees are encouraged to communicate the early recognition of the musculoskeletal disorders to their supervisors;
- All employees must report any work-related injury/illness their supervisors immediately.

7.0 SITE'S EHS SYSTEMS OF WORK

Successful organizations do not come by chance, but as a result of a comprehensive safety management system. Both aspects are considered together, i.e. Health and Safety, in connection with people, machines, substances and working environment conditions.

It is the policy of the EVC, to ensure that tasks are within the competence and capability of each individual employee and the systems of work will be designed with that purpose in mind. Systems of work include all routine work, maintenance work and work by contractors on site. They will include consideration for the safety, health and welfare of visitors and contractors.

NOTE: If any person who is under the medical supervision or on prescribed medication and who has been certified fit for work, should notify their Shift Manager Manager of any known side effects or temporary disability which could hinder their work performance and which may danger themselves or fellow workers.

NOTE: Employees, contractors or visitors are prohibited from attending the premises whilst under the influence of alcohol or illicit drugs. Any employee found breaking this rule or allowing any individual under this condition at EVC premises is liable for instant dismissal.

7.1 Welfare Facilities

The EVC provides welfare facilities:

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- Sufficient and suitable sanitary convenience for both sexes will be provided, adequately lit and with washing conditions;
- A supply of drinking water from the public mains or other source;
- Restaurant facilities supplied with adequate tables and chairs and other facilities for example equipment to heat food, water supply, bins, power, light and heat.

7.2 Disciplinary Action
Covered by Human Resources policies.

7.3 Pregnant Employees
Covered by Human Resources policies.

7.4 Employee Wellbeing
Covered by Human Resources policies.

7.5 Bullying in the Workplace
Covered by Human Resources policies.

7.6 Housekeeping
Poor housekeeping standards can result in slips, trips and falls, and increase the probability of fires and as such high standards of housekeeping are a critical prevention activity:

- All debris must be cleared away each day before leaving the work place;
- Employees and contractors are responsible for maintaining their working areas clean at all times;
- Keep all stairways, passageways, etc, free from materials and obstructions;
- Spillages of oil or other substances are to be cleaned up immediately using the correct procedures;
- Tools or equipment not in use should be placed in there holding areas or containers and not left lying around;
- Keep the work area clean and tidy;
- Avoid placing materials around stairways and walkways;
- Toilets and restaurant facilities are there for your comfort please helps keep the facilities clean and tidy;
- Do not pour liquids, paints, oils, etc. to drain;
- Disposal should be in proper waste containers, clearly labeled;
- Put barriers around, or covers over, all holes and excavations into which people could fall.

7.7 Accident and Emergency Procedures
The EVC recognises the importance of appropriate emergency evacuation procedures. Emergency response arrangements and procedures are outlined in the Johnson & Johnson European Vision Centre Sunbury, current revision of [EVCHSE-0020](#) and the current revision of [EVCHSE-0021](#).

7.8 Injury/Illness Investigation and Reporting
All injury and illness must be reported by the employee concerned to their supervisor immediately and without unreasonable delay (by the end of the shift). Where an incident involves an injury or illness to an employee, then the First Aider must be contacted immediately to assess the situation and ensures the appropriate medical attention is given all of which is outlined in the EVC, current revision of [EVCHSE-0020](#).

7.9 Good Saves Program

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The Good Saves Program is a program based on the reporting of good saves and/or hazards in the workplace by employees. The program's is detailed in the current revision of [EVCHSE-0020](#)

7.10 Ergonomics

The EVC complies with the requirements of the Workplace (Health, Safety and Welfare) Regulations and associated regulations regarding the protection of employees from ill health arising as a consequence of inadequate work station design, repetitive tasks, extremes of temperature, vibration and other ergonomic related stressors. The EHS department:

- Provide training and awareness on EHS for all employees;
- Conduct work station assessment on employees experiencing discomfort;
- Tracks ergonomic related injuries in line with global health guidelines on ergonomic medical surveillance;
- Complete ergonomic assessments using the most suitable tool and/or methodology.

7.11 Materials And Manual Handling

Back injuries caused by incorrect lifting are one of the most common causes of lost time injuries.

All employees complete manual handling training as part of their site induction, contractors are required to provide manual handling training for their employees in accordance with requirements of the Workplace (Health, Safety and Welfare) Regulations.

All employees and contractors, as a minimum, should follow the 8 steps to safe lifting - base movement:

- Assess the task, the area & the load
- Broad stable base - feet flat on floor
- Bend the knees
- Back straight
- Firm grip
- Arms in line with trunk
- Weight close to Centre of gravity
- Turn feet in direction of movement

7.12 Permits to Work

Basic instructions are adequate for most jobs, but some particularly hazardous operations require an extra level of control. Issuing a safe written procedure is good discipline but when the potential risks are high a permit system is implemented (see the current revision of [EVCHSE-0008](#)). A general work permit is required for work non-routine work (where an existing written procedure is not available) and any work involving contractors.

Permits to Work state exactly what must be done and when, a trained responsible person assesses the work and checks safety at each stage. The contractors doing the job must sign the permit showing the hazards and controls necessary. They will also have to provide a method statement and/or a safe work plan.

The following are examples of activities which require particular care and attention and require a permit to work:

7.12.1 Working at Heights

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All work at height must be carried out in accordance with the current revision of [EVCHSE-0013](#).

7.12.2 Overhead Working

At EVC, no work is permitted in a ceiling space or in the interstitial Space without prior approval from an Authorised Person via a general work permit according to the current revision of [EVCHSE-0008](#), and warning signs being placed below the work area. Working in interstitial spaces is only permitted from existing platforms or from approved scaffolding or a MEWP (Mobile Elevated Work Platform). Barriers may also be required to cordon off the area. Where possible, access should be either relocated or detoured away from below the hazard area.

Depending on the level of work and the number of employees/contractors, netting may be required so as to protect from falling objects. All contractors, when deemed a person may fall must be continuously harnessed to a local support. Emergency tensioning harnesses are also required.

7.12.3 Confined Space Entry

Confined spaces include storage tanks, vessels, excavations, manholes, etc. These spaces, which have limited means of egress, inadequate ventilation/lighting and may contain hazardous gases and vapors, present conditions that could cause explosion, asphyxiation or other physical injuries.

All employees/contractors entering a Confined Space must have a Confined Space Training Course completed, with the appropriate training certificates. All works must be carried out according to the current revision of [EVCHSE-0016](#).

7.12.4 Excavations

All excavations must be protected by warning signs, double-rail railings, and have a suitable means of access and egress. If the excavation is more than 1.5m deep, it shall be guarded by shoring, sloping of the ground, and have reinforced walls if required. All excavations must be subject to regular inspections.

7.12.5 Hot Works

All hot works involving temperatures that could give rise to risks of fire or ignition of flammable substances and combustible material, and including work where there is a naked flame or sparks, smoke or fumes must be carried out according to the current revision of [EVCHSE-0014](#).

7.12.6 Electrical Safety

Electrical safety on existing and new equipment EVC must meet the requirements of Lock Out Tag Out (LOTO) in accordance with current revision of Procedure [EVCHSE-0011](#).

7.13 Personal Protective Equipment (PPE)

Equipment worn by an employee that is designed to prevent injury or illness from a specific hazard Proper Personal Protective Equipment (hard hats, safety glasses, goggles and earplugs, etc) must be worn when working in a designated area.

Contractor Companies are responsible for supplying all the necessary personal protective equipment to their employees and ensuring they use it. Each contractor must ensure that they

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comply with all regulatory requirements pertaining to their personal protective equipment. Hi-Visibility vest must be worn at all times in Goods In loading bay/set down and external areas. It is the responsibility of the Contracting Company to supply all PPE as identified in the Risk Assessment. The type of PPE used depends on the hazards you are likely to come in contact with.

When using any PPE always inspect the equipment before each use, and clean and store the equipment according to the manufacturer's instructions. PPE devices alone should not be relied on to provide protection against hazards, but should be used in conjunction with guards, engineering controls, and sound work practices.

NOTE: PPE is the last line of defense against hazards and should only be used after every reasonable effort has been made to eliminate the hazard.

Head Protection Must be worn at all times within designated areas or where construction work is underway. The use of helmets on construction sites is a requirement of law and is strictly enforced. Helmets that have been subject to impacts or any type of damage must be replaced immediately.

Foot Protection Safety footwear fitted with toecaps must be worn at all times on entering the, warehouse and any area under construction.

Face and Eye Protection

Face and eye protection is required when any of these hazards are present:

- Dust and other flying particles, such as metal shavings or sawdust;
- Corrosive gases, vapors, and liquids;
- Molten metal that may splash;
- Potentially infectious materials such as blood or hazardous liquid chemicals that may splash;
- Intense light from welding and lasers.

Safety Glasses: Unbreakable lenses of plastic or tempered glass with side shields. Used for moderate impact from particles produced by jobs such as carpentry, woodworking, grinding, and scaling.

Goggles: Work where significant risk of splash of chemicals or projectiles (loading chemicals) can be worn over prescription glasses. Goggles fit the face immediately surrounding the eyes and form a protective seal around the eyes. This prevents objects from entering under or around the goggles.

Face Shield: For work with significant risk of splash on face or possible explosion. Face shield protects face adequately but not eyes. When worn alone, face shields do not protect employees from impact hazards. Use face shields in combination with safety spectacles or goggles for additional protection.

NOTE: The current revision of procedure EVCFP-0002 provides a full list of PPE required per work area.

7.14 Chemical Substance Management Program

The Chemical Substances Management Program is designed to manage the purchase, storage, use, and disposal of chemical substances at the EVC site. The components of the program include responsibilities, chemical inventories, material safety data sheets, labeling of

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containers, employee training and chemical risk assessment. The current revision of **EVCHSE-0010** outlines the detail of the operating procedures for chemical safety. Stringent controls will be exercised in all matters relating to chemical storage and use. Chemical Usage, Handling and Hazards.

No chemicals are allowed on Site without the approval of the site EHS. Contractors who bring chemicals/hazardous materials on site provide a listing of chemicals intended to be used on the job along with Material Safety Data Sheets (MSDS) and COSHH assessment.

This information must be forwarded to EHS department for approval at least 3 working days before the proposed date of use of the chemical(s). The chemical(s) cannot be used on site unless approved by EHS department. No one may use any chemical or mixture unless they have read the associated Material Safety Data Sheet (MSDS), and all parties in the area have been informed of the presence and hazards of the chemical. The EVC shall provide contractors with any necessary MSDS and COSHH assessment upon request for chemicals, which may be encountered during the course of their work. It is every contractor's responsibility to be aware of any potential chemical hazards, which may be encountered as part of their job. Additionally, they should know the location of the nearest emergency shower and/or eye wash station.

Any chemical spills must be immediately reported to Security ext. 4200 who will in turn alert the chemical spill Team. Chemicals must not be poured into sinks or down drains. They are to be placed in appropriate waste containers and properly identified. If there is any doubt, the contractor shall be responsible for requesting the guidance of EHS department. Incompatible chemicals must be separated (i.e. acids, bases, flammable solvents, etc.). Labels must be clearly positioned and easy to read. Periodic checks will be conducted to ensure that labels are in place, in good condition, legible, and include the required information. At a minimum, labels will display the relevant primary hazard symbol and warning statements pertaining to the specific hazards associated with exposure to the contents. Flammable liquids (petrol, solvents, etc.) shall be stored in approved metal cabinet only. Flammable solvents must not be used around possible sources of ignition. Rags used with flammable liquids shall be stored in approved metal waste containers when not in use and disposed of through an approved waste disposal system.

7.15 No Idling Policy

EVC enforces a no idling policy on site. No load/unload vehicle owner shall cause vehicles to idle for a period greater than 30 minutes. No owner or driver of a vehicle shall cause vehicles to idle for more than 5 minutes in any 60 minute period as detailed in Form Control No. **EVWA-0141**.

8.0 MANAGEMENT OF EHS NONCONFORMANCES AND ASSESSMENT OF RISKS

8.1 Management of EHS Non-conformances

The site EHS is responsible to take the required action to prevent an EHS nonconformance by implementing and sustaining a suitable EHS management system for all activities within EVC. It is the responsibility of the site EHS to review and to ensure all practices conducted within EVC or linked to EVC are conducted in line with Johnson & Johnson policy and poses no risk of raising an EHS nonconformance.

If a situation arises where a potential or actual nonconformance is identified it shall be addressed in a timely manner and a complete investigation conducted to identify the root cause to ensure all appropriate control measures can be identified and driven to closure via the Environmental, Health & Safety Management Action Plan (EHS MAP) and effectiveness, minimising the business impact and the probability of a recurrence. Once addressed an

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effectiveness review shall be completed incorporating all aspects of the amended EHS management system ensuring all appropriate measures have been implemented in full this preventing the nonconformance from reoccurring.

EHS Management Action Plan

The EVC is committed to a process of continuous improvement within all aspects of EHS. To ensure all tasks are completed in a timely & effective manner all tasks are logged and managed within the Environmental, Health & Safety Management Action Plan (EHS MAP) and managed on a weekly basis by the site.

8.2 Identification of Hazards and Assessment of Risk

The EVC is committed, so far as is reasonably practicable, to the identify all hazards in the workplace (using risk assessments) and that employees shall be informed of the dangers and the appropriate controls by identification of hazards and assessment of risk in the workplace as required by the Management of Health and Safety at Work Regulation and the Health and Safety at Work Act.

8.2.1 Explanation of the Risk Assessment Process

The safety management system is based on the identification of hazards and an assessment of the risks to safety and health at work. Risk assessments can be defined as the overall process of estimating the magnitude of risk and deciding whether or not the risk is tolerable. Risk assessments shall be conducted every 3 years, or when changes in the workplace occur. Risk assessment is undertaken for all activities on site and follows the methodology recommended by the Johnson and Johnson EHS&S organisation.

The assessment compares the existing health and safety practices with:

- The provisions set out in the organisation's EHS Policy;
- The requirements of local EHS regulations;
- Existing authoritative and published health and safety guidance and best practice in the industry.

A risk assessment is based on linking of the probability (Table 1) of the occurrence to the severity (Table 2) of loss and /or injury. It is an assessment that assesses the risk (Table 3) of each hazard noted on the risk assessment form by a colour coding and ranking them according to score (Tables 4 and 5).

A risk assessment is based on a systematic identification of hazards and an assessment of the associated risks to safety, health and the environment. A hazard is a substance, situation, operation, machine or process with the potential to cause harm. A risk relates to the likelihood of injury or damage being caused by a particular hazard.

Table 1. Likelihood

Very Unlikely	1	Freak event - no known history
Unlikely	2	Unlikely sequence of events
Possible	3	Foreseeable under normal circumstances
Likely	4	Easily foreseeable
Very Likely	5	Common occurrence

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Table 2. Severity

Insignificant	1	No injuries
Minor	2	First Aid - Minor cuts, bruises, no long-term effects, on-site release immediately contained
Moderate	3	Lost Work Days - Heavy bruising, deep flesh wounds, lost time accident, on-site release contained with outside assistance
Major	4	Lost time accidents and major injuries, loss of production capability, off-site release with no detrimental effects
Catastrophic	5	Long term disability or death, toxic release off-site with detrimental effect

Table 3. Risk Analysis Matrix

		Severity:				
Likelihood:		Insignificant	Minor	Moderate	Major	Catastrophic
		1	2	3	4	5
Very Unlikely	1	1	2	3	4	5
Unlikely	2	2	4	6	8	10
Possible	3	3	6	9	12	15
Likely	4	4	8	12	16	20
Very Likely	5	5	10	15	20	25

Table 4. Colour Coding Risk

White =	Insignificant Risk
Green =	Low Risk
Yellow =	Moderate Risk
Pink =	High Risk
Red =	Very High Risk

Table 5. Hierarchy of control

0 - 4	Insignificant no further action
5 - 9	Low - Complete Further Action if Required
10-12	Moderate - actions taken to further reduce risk
15-16	High - Stop/Do not complete - Review additional controls to reduce risk
20-25	Very High - Stop Activity, Do not complete item of work

9.0 TRAINING REQUIREMENTS

The training requirement for this document is 'read only.'