



# CCM Policy 1

## *Cenve Policy Document*

Document Ref:	QA-0000-HS-P-0001	Revision:	A	16-Oct-16	
Document Temp:					
Issue Date:	1 November 2015				
Status:	Issued				



**CONSTRUCTION EXCELLENCE NATIONAL VALUE ENGINEERING**

**HEALTH, SAFETY & ENVIRONMENTAL  
MANAGEMENT SYSTEM**

**POLICY, ORGNAISATION & ARRANGEMENTS  
FOR IMPLEMENTATION**



## **CONTENTS**

- 1.0 INTRODUCTION
  - 1.1 Introductory Statement
  - 1.2 Structure of the Safety Management System
- 2.0 POLICY STATEMENTS
  - 2.1 Health and Safety
  - 2.2 Environment
- 3.0 PLANNING
  - 3.1 Hazard Identification, Risk Assessment and Control
- 4.0 LEGAL AND OTHER REQUIREMENTS
  - 4.1 Procedure for Identifying, Assessing and Updating Regulations
- 5.0 OBJECTIVES AND TARGETS
  - 5.1 Setting of Objectives and Targets
  - 5.2 Responsibilities
- 6.0 STRUCTURE AND RESPONSIBILITY
  - 6.1 Organisational Chart
  - 6.2 Responsibilities
- 7.0 TRAINING AND AWARENESS
- 8.0 CONSULTATION AND COMMUNICATION
  - 8.1 Health & Safety Consultation
  - 8.2 Communication
- 9.0 DOCUMENTATION
  - 9.1 Combined System Documents
  - 9.2 Control of Documents
  - 9.3 Printed Documentation
  - 9.4 Retention of Documents
- 10.0 OPERATIONAL CONTROL
  - 10.1 Operational Control of SMS
  - 10.2 Operational Control of the Business

10.3 Adherence to the System

11.0 EMERGENCY PREPAREDNESS AND RESPONSE

11.1 Activities Identified and Response

11.2 Review of Procedures

12.0 PERFORMANCE MEASUREMENT AND MONITORING

12.1 Levels of Measurement and Monitoring

12.2 Monitoring of Objectives and Targets

12.3 Proactive Performance Measurement

12.4 Reactive Performance Measurement

13.0 ACCIDENTS, INCIDENTS, NON-CONFORMANCE, CORRECTIVE & PREVENTIVE ACTIONS

13.1 Accidents and Incidents

13.2 Non-Conformances and Observations

13.3 Corrective Actions

14.0 RECORDS

15.0 AUDIT OF THE SYSTEM

15.1 Internal Inspection and Audits

15.2 External Audits

16.0 MANAGEMENT REVIEW

16.1 Revision and updating

16.2 Review

## 1.0 INTRODUCTION

### 1.1 Introductory Statement

This document sets out the policy, organisation and arrangements for Health, Safety and Environment (HS&E) throughout CENVE, its subsidiary companies and divisions, as required by applicable National and International Health, Safety and Environmental legislation. In Qatar, the key legislation would be from the recent Qatar Construction Specifications (QCS 2014). However, CENVE also incorporates international standards and guidelines from the United Kingdom. The key international standards and guidelines would be Section 2(3) of the Health and Safety at Work etc Act 1974 and primary environmental legislation including the Environmental Protection Act 1990.

These describe the framework of the Health and Safety Management System (SMS) and include cross-linkage to the Environmental Management System (EMS), used throughout CENVE.

The system is continuously updated and takes account of statutory obligations, the lessons of experience and the need for continuous improvement. The format is based on the QCS 2014 and the United Kingdom Health and Safety Executive guidance document HSG65 "Successful Health and Safety Management Systems". The EMS conforms to ISO 140001:2004.

Secondary documents, the CENVE Health, Safety and Environmental management Manual and subsequent manuals referenced therein, contain the detailed procedures, practices and standard forms used to implement the Health, Safety & Environmental Management System (SMS).

The overall aim is to ensure the control of risks to health, safety and the environment arising work undertaken by CENVE.

The Board of CENVE, and each Director of the individual businesses, fully accept their collective and individual roles in providing HS&E leadership for the organization.

HS&E is a shared responsibility. Everyone has a duty to take reasonable care of themselves and those around them. We must therefore all work together to prevent accidents, ill health, and environmental damage, and the hardships that follow.

### 1.2 Structure of Safety & Environmental Management System

- 1.2.1 The SMS complements and must be read in conjunction with Core and Enabling processes which are also accessed through CENVE Database.
- 1.2.2 The HS&E Management System applies to every workplace, describes our HS&E procedures and contains the tools to help every workplace to control risk, comply with legislation and provide proof and assurance of compliance.
- 1.2.3 The home page can be accessed from the database and allows navigation to the main sections of the SMS.
- 1.2.4 The sections on specific risk activities such as work at height, lifting, excavations, temporary works etc, also contain process and procedure, Guidance, Template Forms and Checklists in a similar way to the other main sections of the SMS.
- 1.2.5 Each individual section has a summary procedure its section page and has hyperlinks out to the full procedure and appendices.
- 1.2.6 Users are encouraged to make formal comments or suggest future updates through the form T18-B referenced from the SMS.

### 1.3 Document Status

- 1.3.1 The Master documents are kept electronically on the database and can be accessed from each workplace.
- 1.3.2 This master is deemed to be the controlled copy of the HS&E Management System (SMS) and can only be altered by the controller of the document. The Central HS&E Team will keep a copy of superseded master HS&E Management System documents.
- 1.3.3 All printed or CD ROM copies are deemed 'uncontrolled issue' documents.
- 1.3.4 The system is formally reviewed at least annually and kept updated by authorized personnel, with outdated documents removed or archived.
- 1.3.5 Where specific business activities could require modification of procedure or procedures, the authority of the Group HS&E Manager and the Central HS&E Team must be sought unless otherwise stated in the SMS.
- 1.3.6 Where the company is part of a Joint Venture project, agreement must be reached on the system to be used and approval gained from the Group HS&E Manager and Central HS&E Team.
- 1.3.7 The holder of any hard copy is responsible for ensuring that they are working from the latest version of the document.
- 1.3.8 The SMS provides the management framework for CENVE workplaces and will be supplemented by location specific detail in Project or Establishment Plans.

## 2.0 POLICY STATEMENTS

### 2.1.1 Health and Safety

***Through the way we work and behave, all our people and stakeholders will be protected from risks of occupational injury or ill health.***

It is our intent to demonstrate an ongoing and determined commitment to improving health and safety at work throughout our organisation.

We will ensure the health and safety at work of all our people and any other people who may be affected by our work activities. We will comply with the requirements of health and safety legislation.

We will lead industry by promoting best practice and exceeding the guidance of the QCS2010 and other regulatory bodies.

This policy reflects our commitment to ensuring that health and safety at work is paramount to the business, and that effective health and safety actively contributes to our success.

#### 1. Awareness:

***“All our people and stakeholders have an awareness and understanding of health and safety hazards and risks that affect our business.”***

##### 1.1. Health and Safety Policy Statement:

Adequate resources will be provided to ensure all our people and stakeholders are aware of this policy and committed to its effective implementation.

##### 1.2. Communication and Consultation:

There will be active open communication and consultation between all our people and stakeholders. Health and safety will be integrated into our communications, wherever appropriate.

##### 1.3. Management Roles & Responsibilities:

Roles and responsibilities for health and safety will be defined, as necessary, within job descriptions or profiles. Senior management will ensure that:

- adequate resources are provided for health and safety;
- health and safety is adequately assessed, controlled and monitored; and
- our people are actively involved on matters that affect health and safety.

##### 1.4. Hazard Identification:

We will identify our workplace health and safety hazards. We will inform our people and stakeholders, as appropriate, of these workplace hazards. We will require our sub-contractors and stakeholders to identify health and safety hazards that may impact on our work activities.

#### 2. Competence:

***“All our people and stakeholders have the competence to undertake their work with minimum risks to health and safety.”***

### 1.1. Health and safety Training:

All our people will be adequately instructed and trained on the health and safety issues that affect them, and the safe working practices that should be followed. We will ensure the health and safety competence of our sub-contractors and stakeholders.

### 1.1. Behaviour and Culture:

Senior management will demonstrate leadership in health and safety. Senior management will undertake tours to ensure that health and safety issues are identified, assessed and managed. Systems will be in place and people will be empowered to raise health and safety concerns with management.

### 1.2. Risk Assessment and Management:

We will assess the risks associated with health and safety hazards in the workplace. All our people will be informed of the health and safety hazards and risks that affect their work. We will take action to prevent, reduce or control risks to an acceptable level and reduce the potential for incidents and accidents. We will require our sub- contractors and stakeholders to identify health and safety risks that may impact on our work activities.

## 3. Compliance:

***“Our work activities achieve compliance with legislation, and our people are empowered to take action to minimise health and safety risks.”***

### 1.1. Incident Investigation:

We will report and investigate accidents, incidents and near misses to drive improvement in our health and safety management. Any lessons learned from such events will be used to take corrective action to prevent recurrences.

### 1.2. Incident Investigation:

We will actively and openly, review and report on our health and safety performance against published objectives and targets. Improvement plans will be developed to support the delivery of the objectives and targets.

### 1.3. Measuring Performance:

We will actively and openly, review and report on our health and safety performance against published objectives and targets. Improvement plans will be developed to support the delivery of these objectives and targets.

### 1.4. Health and Safety Management System:

We will implement management systems to ensure we:

- comply with health and safety legislation;
- fulfill the requirements of QCS2010, Labour Law (14) 2004; and
- continually improve our health and safety performance.

### 1.5. Sub-contractor Improvement:

We will engage and collaborate with our sub-contractors to ensure their:



- health and safety capability and competence fulfill our expectations;
- health and safety performance is monitored and reviewed; and
- work activities have minimal health and safety impacts on our activities.

4. Excellence:

***“Construction Excellence National Value Engineering is recognised for excellence in the way it manages health and safety.”***

**1.1. Developing Innovative Practices:**

We will constantly encourage, develop, review and share “health and safety good practice” both internally and externally.

**1.2. Influencing Stakeholders:**

We will only work with joint venture partners and clients who are willing to meet and achieve our health and safety expectations. We will engage and influence stakeholders to drive improvements in health and safety.

**1.3. Work-related Health:**

We will assess our occupational health risks. All our people will be informed of the occupational health risks that affect their work. We will take action to prevent, reduce or control occupational health risks to an acceptable level and reduce the potential for ill health, including assessing all our people’s fitness for work. Health surveillance will be conducted to satisfy health and safety legislation.

5. Delivering our policy:

Our policy will be delivered by:

- generating a culture that does not tolerate threats to health and safety; and
- ensuring the real involvement of all our people, the sub- contractors and stakeholders.
- Business groups will implement management statements that explain how this policy will be delivered in the workplace.

6. Policy Review:

This policy has immediate effect and replaces all previous versions. This policy will be reviewed and amended, as necessary.

---

**SHEIKH FAHAD BIN NASSER AL-THANI**  
Chairman

### 2.1.2 Environment

CENVE is committed to the protection and enhancement of the environment. Environmentally sustainable performance is an ongoing priority to be achieved by adhering to this policy, which is operated in conjunction with our Sustainable Development, Biodiversity, Carbon Management and Responsible Sourcing policies.

We will meet our environmental responsibilities by implementing and maintaining an Environmental Management System (EMS). The EMS applies to services provided by the Company's permanent offices and its design, construction and manufacturing activities. This includes activities, products and services provided by organisations working on behalf of CENVE.

It is CENVE's objective to:

- Continually strive to improve the environmentally sustainable performance of its activities, products and services.
- Comply with environmental legislation and any other environmental requirements which apply to its activities, products and services, and regularly assess adherence to these.
- Proactively seek to minimise the environmental impact of its activities, products and services.
- Reduce waste and improve resource efficiency.
- Reduce water consumption and improve water efficiency.
- Endeavour to eliminate the production of polluting emissions or discharges into the environment.
- Take proactive measures to enhance, protect and preserve wildlife and flora, and their natural habitats.
- Set objectives, targets and programmes, and review and revise them regularly with the aim of continual improvement in environmental sustainability performance.

The achievement of these objectives shall be supported through the Database (Group's online integrated business management system) which complies with ISO 14001:2004. The effectiveness of Database shall be enhanced by:

- Programme presentations / communications;
- Employee training and instruction in sound environmental practice;
- Maintaining registration to ISO 14001:2004 for its principal Construction businesses and progressively seeking registration for business units not currently holding ISO 14001.

CENVE will participate in open consultation with interested stakeholders and ensure effective communication of this policy to all those working for and on behalf of the Company.

**SHEIKH FAHAD BIN NASSER AL-THANI**  
Chairman

### 3.0 PLANNING

#### 3.1 Hazard Identification, Risk Assessment and Control

National and International Legislation and Directives require employers to assess the risks to Health to Safety of employees and others who might be affected by their undertaking. Environmental legislation also dictates that environmental risks should be appropriately identified and controlled. The assessment of risk is a process that identifies hazards and details the control measures to be adopted. Managers at all levels will identify hazards and record their findings prior to development of specific risk assessment.

In all parts of the Group, this process starts at the earliest possible stage and continues throughout the work process, focusing on successively smaller elements of work and work interfaces:

- Design stage assessments are carried out to eliminate or reduce risks in construction and maintenance by influencing design decisions.
- Tender stage assessments identify the major risks in order that appropriate provisions are made in the tender.
- Where relevant, pre-construction stage assessments are used in developing the Construction Phase Health & Safety Plan, Environmental Management Plan and associated site rules.
- Interim review of assessments is carried out at least quarterly as part of the planning process. They may focus on reviewing existing work activities or forthcoming major elements of work to identify where further, more detailed assessments need to be made of specific operations.
- Task specific assessments are the final level where all the hazards are identified and the detailed control measures required are specified.

The detailed output at each of these stages will vary according to the precise nature of the findings, who needs to be informed and whether the issues are already addressed in other documentation. Standard forms to assist in the risk assessment process are included within the Safety Management System.

Method statements are the most commonly used way of describing how specific operations are to be carried out. CENVE therefore requires that method statements be produced for all high-risk operations and for any other operations where the control measures are not immediately obvious from standard procedures or Health and Safety Plans or Environmental Management Plans.

The precise content or hierarchy of method statements and briefings will vary according to the scale and complexity of the job and the level of risk involved. However, a list of the issues to be considered in producing or approving a method statement is provided within the Health & Safety Manual.

## 4.0 LEGAL AND OTHER REQUIREMENTS

### 4.1 Procedure for Identifying and Updating Regulations and Authoritative Guidance

The group maintains access to an updated list of regulations, good practice guides, codes of practice and other information relevant to HS&E derived from:

- Qatar Construction Specifications
- Membership of HS&E groups
- Newsletters
- Guidance from the HSE or other relevant authoritative National enforcement bodies
- Purchasing documents to reflect activities in progress
- Access to QCS and UK standards, legislation and guidance is through the Database
- IOSH (Institution of Occupational Safety and Health) publications
- Croner's publications: e.g. Construction Case Law etc
- Periodicals
- National lists of current health and safety legislation
- The BEC/CIP Construction Manual (available online)
- QCS and UK HSE legislation lists
- Environmental agencies legislation lists

The HS&E Department maintains a limited number of documents in hard copy. The Group HS&E Manager, or his nominees, decide if new or revised documents have sufficient Construction and HS&E interest to merit purchase and retention in the library. Some superseded documents are retained for reference and marked 'S/S'.

Documents that have a wider interest to personnel outside the department are reviewed for impact and distilled into bullet point format and where possible restricted to a single side of A4. This may be new legislation, comment on proposed legislation or new guidance. Where documents are revised an update may be produced. For simple documents, mention may be made in the HS&E Newsletter or a Safety Alert if urgent.

Because of the vast amount of Safety and Environmental legislation and the interlinking of the Regulations and Statutes we have decided not to define the Regulations pertaining to the activity on the Safety Task sheet or Environmental Management Plan, which could be lengthy and certainly unproductive. The legal HS&E lists will be actively monitored and revisions are obtained by reference to the above noted organisations. The Group formally responds to consultation on new legislation where this is required and new legislation is reflected in revisions to the Health, Safety and Environmental Management System.

An environmental list known as the Environmental Legislation Register is distilled to include legislation that is relevant to our operations and compliance is required. A compliance audit will be undertaken to ensure that the requirements are being adhered on a programmed basis.

## 5.0 OBJECTIVES AND TARGETS

### 5.1 Setting of Objectives and Targets

CENVE and each of its business units must state within their agreed annual business plans, objectives and targets for HS&E matters for the period under review as a driver for continuous improvement.

These objectives and targets must include details of the resources to be allocated to HS&E, training and auditing programmes, new initiatives proposed and specific HS&E targets against which performance can be measured.

Performance will be reviewed annually, so that results will be available for publication in the annual report with new objectives and targets set by business and be based on:

- The results of audits and reviews of the system in the previous year
- A review of the risks (to people and the environment) of the operations.
- Any feedback from the Boards on policy changes for the year.
- A detailed review of each Business.

Objectives and targets will be monitored on a monthly basis and deviations noted in the monthly Board Report.

The objectives and targets will then be published and made available to all responsible for their implementation, on the main notice boards, and on the Database.

### 5.2 Programme for Achieving Objectives

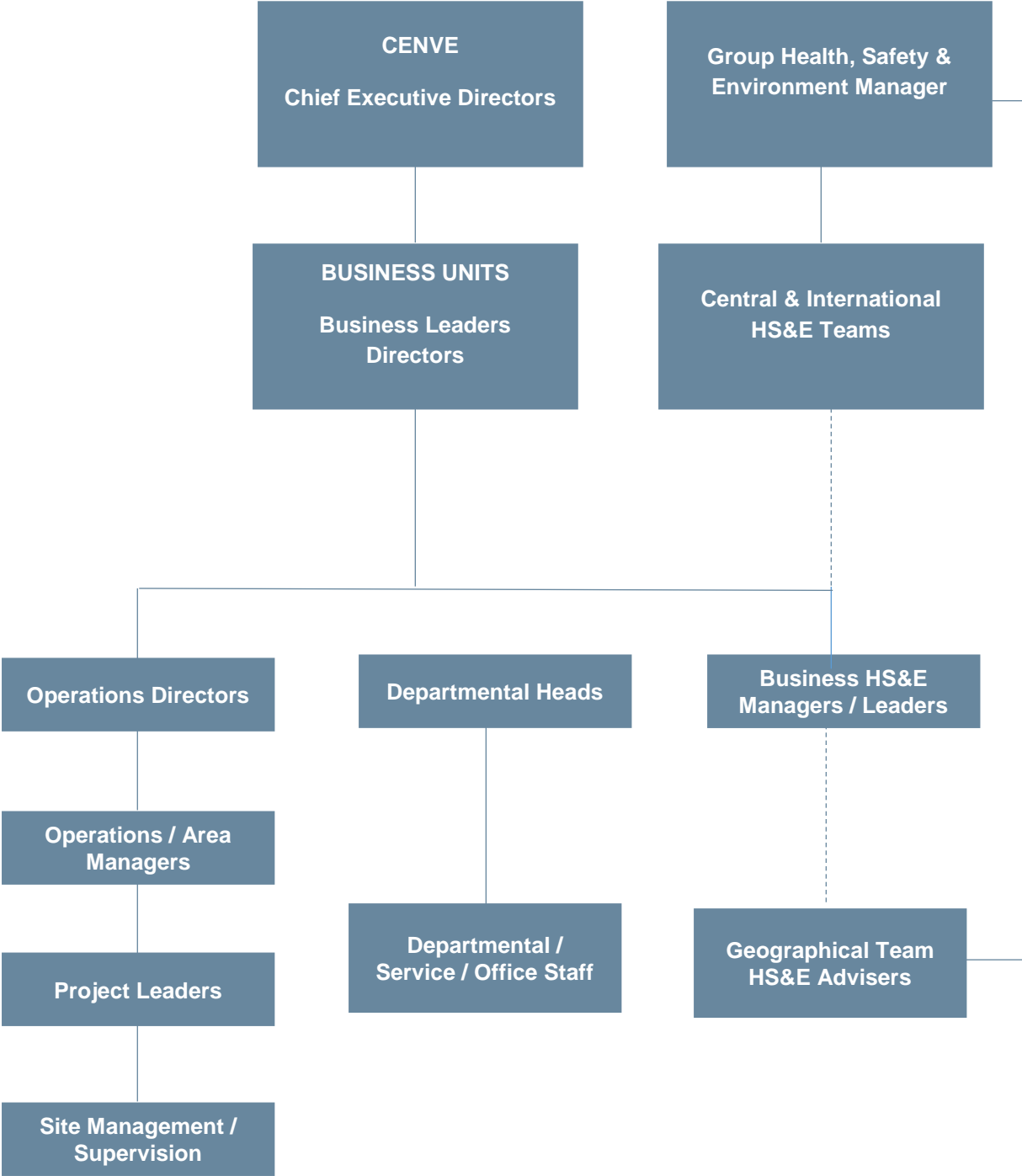
The targets are identified, discussed with those concerned or in control, agreed and noted on the objectives programme. These targets and programme are issued to relevant personnel and monitored by the Board. The programme is reviewed at regular intervals by the Board and updated, amended, changed or extended as required. Any outstanding issues are discussed with the relevant persons and, if necessary, the target dates are amended or the initiative removed.

The target programme may be distilled into an action list or sub programmes for individual sites or sectors to improve their performance.

Monthly Board reports and interim reviews detail relevant and important information to the Board and Directors with special responsibilities. Outstanding actions that are important to the well-being of personnel that remain un-actioned for a considerable time may attract disciplinary action.

**6.0 STRUCTURE AND RESPONSIBILITY**

6.1 Organisation Chart



## 6.2 Responsibilities

The Board Directors of CENVE, its subsidiaries, companies and divisions, fully endorse the company's Health and Safety, and Environment policies and will endeavor to provide the strategic leadership and all necessary financial, technical and human resources to secure compliance with that policy. In particular:

- The Boards accept their collective role in providing HS&E leadership for the organisation.
- Each Board member accepts their individual role in providing HS&E leadership for the organisation.
- The Boards will ensure that all Board decisions reflect their HS&E intentions, as articulated in the health and safety policy statement.
- The Boards recognise their role in engaging the active participation of all workers in improving HS&E.
- The Boards will ensure that they are kept informed of, and alert to, relevant HS&E risk management issues.

In order to provide a focus for, and champion of, health and safety issues at board level, the directors will appoint a Group HS&E Manager for the Management of HS&E. However, this appointment in no way absolves the Board or any of its Directors from their collective or individual responsibilities.

In addition to the overall responsibilities outlined above, each one of the Directors of the Business units is responsible to the Chief Executive for the Management of HS&E within those parts of the business under their control.

However, the management of HS&E is a shared responsibility of all line and service department managers throughout the Group. Therefore, managers at all levels are responsible for the health and safety at work of persons under their control and for ensuring that HS&E issues are properly considered.

HS&E departmental staff are responsible for providing advice, assistance and support to managers at all levels of the organisation and to all employees.

CENVE expects that all employees will make a contribution to the total effort to reduce accidents, ill health or environmental damage and that this effort is an integral part of the business process.

Further details of departmental and individual responsibilities for HS&E, including Directors, are contained within the Safety Management System.

## 7.0 TRAINING AND AWARENESS

The CENVE aims to provide employees of the appropriate level of competence throughout its organisation. This is achieved through a combination of appropriate experience, education, training, selection and development of individuals, backed by appropriate support.

The specific training needs of individuals are identified and delivered through the following mechanisms:

- Maintenance of an internal HS&E training department as part of the Human Resources function
- Provision of staff development programmes
- Providing challenges and career opportunities
- Annual performance reviews for all staff
- Pre-appointment assessments to identify gaps in knowledge
- Awareness training and guidance on the application of the SMS
- Delivery of specialist competence and HS&E training
- Induction to raise awareness of specific issues relating to the workplace
- Health and safety monitoring
- Recommendations arising from re-active monitoring

Managers at all levels are responsible for assessing and meeting the training needs of their staff. Human Resource and HS&E Departments advise and assist managers in carrying out these tasks and in compiling formal HS&E training programmes.

Human Resource Managers will ensure that a central database of all training provided to employees is maintained. Managers are able to consult this database as part of the competence assessments they undertake. They are then able to nominate candidates for the publicised programme of standard in-house courses or procure external training resource.

Procurement Managers ensure that only those companies, who have been assessed as having the appropriate competencies, including HS&E, are engaged to carry out work on behalf of the CENVE. This applies to contractors, designers, consultants and any other specialists. Appropriate detailed procurement procedures to achieve this objective are maintained by Procurement.

## 8.0 CONSULTATION AND COMMUNICATION

### 8.1 Health, Safety & Environmental Consultation

CENVE considers co-operation and consultation between individuals, safety representatives, employers, unions and all other parties as integral to combating risks to health, safety and the environment. It therefore promotes co-operation in order to generate the added benefits that arise from the involvement of all and the pooling of knowledge and experience.

At every place of work, defined methods for consultation are set out in the relevant Health and Safety Plans or operating documents. All company workplaces will establish a safety forum, either in the form of a safety committee or other agreed alternative. Other less formal consultation mechanisms via small groups or individuals are also suitable.



## 8.2 Communication

The Group creates and sustains an awareness of the importance of HS&E issues by the use of written, verbal and visual communication. This includes the visible behavior of all managers in support of HS&E.

Various mechanisms exist within the Group for the dissemination of HS&E information. These include:

- Employment handbooks
- Health, Safety & Environmental Management System (SMS)
- Health, Safety and Environment Plans
- Induction processes
- Posters, newsletters and announcements on the site safety and environment notice boards
- Formal safety courses
- Company InfoWorks publication
- Database based information systems
- Safety alerts
- Briefings, Method Statements, Tool Box Talks and 'TASK' sheets
- In-house safety publications, such as the A4 books or A6 pocket booklets
- Technical library facilities
- Open-learning facilities

Discussion of HS&E issues is encouraged at all levels of the Group. HS&E Safety is an agenda item on all CENVE Board meetings.

Specific HS&E Management Groups including Safety Leadership Teams, operate within each business to act as the focus for debate on policy formulation and implementation.

The Group requires all its managers and supervisors to "lead by example" and to emphasize the importance of HS&E through their visible behavior.

## 9.0 DOCUMENTATION

### 9.1 Combined System Documents

The combined CENVE SMS comprises the following documents:

**PART 1** The policy organisation & arrangements for implementation document

**PART 2** Health, Safety & Environmental Management Manual – Procedures & Standards

**PART 3** Templates, Guidance & Tools reference documents

## 9.2 Control of Documents

The Master CENVE SMS documents are kept electronically on Database, which can be accessed from each workplace. These master documents on Database can only be altered by the controller of the document.

The system is reviewed at least annually and kept updated by authorised personnel, with outdated documents removed or archived.

## 9.3 Printed Documentation

All printed copies are deemed to be 'uncontrolled issue' documents

It is the responsibility of the holder of any hard copy to ensure that they are working from the latest version of the document and to destroy any old documents or mark them 'S/S' as superseded.

Other reference documents may be held by the businesses for distribution for immediate use or reference.

## 9.4 Retention of Documents

The HS&E Department will keep a master copy of superseded Safety Management System

# 10.0 OPERATIONAL CONTROL

## 10.1 Operational Control of the Safety Management System

The content of the Safety Management System will be reviewed and controlled by the Group HS&E Manager, in association with his Senior HS&E Managers.

## 10.2 Operational Control of the Business

Operational control of the business activities will be maintained by effective implementation of the procedures of the CENVE Safety Management System and their out workings through the appropriate Safety and Environmental Management Plans.

The effectiveness of this operational control will be assessed by inspection and audit as described in sections 12 and 15 of this document.

Consideration of HS&E starts with the Company's first involvement in a project and includes identifying potential risks and developing strategies that remove, minimise or enable best control of those risks at tender stage, pre-start, procurement of suppliers, contractors and designers, design stage and construction or production.

Documented procedures are defined and maintained in the subsequent volumes of this SMS and the specific HS&E Plans relating to the work activity. These procedures include operating criteria and the means by which the contents will be communicated to suppliers, contractors.

## 10.3 Adherence to System

As a consequence of accreditation to OHSAS 18001 and BS EN 14001 in Qatar, CENVE will use the system unless agreed otherwise by the Managing Director of the Business and the Group HS&E Manager.

## 11.0 EMERGENCY PREPAREDNESS AND RESPONSE

### 11.1 Activities identified and Responses

The group will, through its various business units, establish and maintain procedures in Health and Safety and Environment Plans for its response to emergency situations that may be applicable to individual projects or work locations. These will address the issues of immediate response, communications with all parties and the mitigation of further likely illness, injury or damage.

### 11.2 Review of Procedures

The procedures in the relevant Health and Safety and Environmental Plans will be reviewed as part of the standard review process on a yearly basis or after an incident or emergency to reflect lessons learnt or address any procedural inadequacies. Standard procedures such as fire drills etc. will be carried out as defined within the individual Plans to assess the adequacy of their arrangements.

## 12.0 PERFORMANCE MEASUREMENT AND MONITORING

### 12.1 Levels of Measurement and monitoring

The level and intensity of measurement and monitoring is defined within the SMS and the relevant Health and Safety and Environmental Plans. These are arranged to reflect the assessed risk of the workplaces within CENVE. Therefore the frequency and depth of monitoring are of a higher intensity on construction projects than within the office environment.

### 12.2 Monitoring of Objectives and Targets

The objectives and targets set by the business units (refer to section 5 above) will be monitored at many levels including:

**Main Board Level:** Monthly Board Report including KPIs

Director's briefings

**Safety Leadership Forum:** Bi-monthly or as agreed

**Business Board Level:** Monthly Board Report including KPIs

Management Meetings

#### **Safety Management Group Meetings**

**Establishment / Project Level:** Monthly Report

Safety Reviews

### 12.3 Proactive Performance Measurement

Proactive performance measurements are defined in the Health & Safety Management System, and include routine inspections of specific items, specific inspections and compliance with systems through various mechanisms such as:

- Director's Safety Tours
- Operations Managers Quarterly Reviews

- Statutory monitoring
- Supervisor's Routine Inspections
- CENVE Scorecard
- HS&E Adviser's Inspections
- CENVE Audit

#### 12.4 Reactive Performance Measurement

Reactive measurement of performance is defined in the Safety Management System and will include:

- Accident Investigation
- Corrective and Preventive Action Analysis
- Health Surveillance
- Monitoring of Incidents (Including near misses)

The calibration of monitoring equipment will be managed in accordance with the relevant procedures.

### 13.0 ACCIDENTS, INCIDENTS, NON-CONFORMANCE, CORRECTIVE & PREVENTATIVE ACTIONS

#### 13.1 Accidents and Incidents

The investigation and reporting of incidents resulting in injury or ill health, dangerous occurrences and near misses is carried out in accordance with company procedures as defined in the Safety Management System.

The prime objective of investigating and reporting is to provide open, honest and comprehensive information on the immediate and underlying causation of incidents such that recurrences can be prevented.

#### 13.2 Non-Conformances and Observations

The term nonconformance is considered to be any deviation from standard work practices, procedures, regulations, management system performance etc that could directly or indirectly lead to injury, illness, property damage or damage to the environment.

It is recognised that the majority of non-conformances will be raised as observations as part of an inspection report. Many minor non-conformances noted on site will be resolved immediately. For more serious non-conformances, a time scale shall be set for appropriate remedial action to be taken.

The facility for issuing formal non-conformance sheets is contained within the Directors Safety Tours information and the Formal Audit process.

Deviations from the SMS can be identified by:

- Directors safety tours
- By Auditors as part of their audit

- Supervisors on their weekly check sheets or identified as part of their duties.
- HS&E Advisers as part of their routine inspections.
- By any operative or member of staff to their supervisor

### 13.3 Corrective Actions

Procedural corrective actions will be identified, taken and, if necessary documented procedures modified, all under the advice of the Health, Safety & Environmental Department.

Observational corrective actions will be closed out at the time or within a defined time period as agreed.

For continued failure to action items noted on a report, or very serious incidents that would be regarded as Prohibition Notices by the HSE, the Director responsible is advised by phone and the incident noted in the relevant Board report.

## 14.0 RECORDS

The CENVE Group and its individual business units will identify, retain and archive copies of relevant HS&E information and records for the appropriate periods, as defined in the HS&E Management System.

These will be legible, identifiable and traceable to the activities involved and maintained so that they are easily retrievable and protected against damage.

## 15.0 AUDIT OF THE SYSTEM

### 15.1 Internal Inspection and Audits

Each CENVE Business unit will establish and maintain an inspection and audit programme to determine the level of implementation, adequacy and effectiveness of the HS&E Management System.

Internal inspection and audits will be conducted to assist Management in the control of all aspects of safety and the environment. These Audits will be used to verify compliance with the Health and Safety Management System and to determine its effectiveness.

Formal inspections and audits will be conducted by staff from the HS&E department in conjunction with the Department concerned, on a detailed and documented basis against a defined schedule, usually the site file or this document.

All Departments with functions having a bearing on the company's health, safety and environmental performance shall be inspected periodically in line with the perceived risk.

Audits shall include an evaluation of:

- Follow up actions from earlier inspections and audits
- Activities, processes, work areas, products and services being produced.
- Safety practices, systems, procedures and instructions
- Certification documents and records.
- Any changes in legislation, work practices or organisation structure

Appropriately trained, experienced personnel shall carry out formal inspections and any additional audits following an agreed timetable.

Results of any audit will be presented in a written report. Management responsible for the area audited shall review, agree and correct deficiencies revealed by audit.

The Board of Directors or the Safety Manager may call for additional audits.

## 15.2 External Audits

External audits may be carried out:

- To meet statutory requirements - e.g. by Fire Brigades or Local Authority
- By Certification Bodies to maintain certification
- By external consultants called upon to provide specific advice.
- By clients seeking to confirm CDM competencies

In all cases, facilities will be made available for the auditor and a host provided for the auditor during their visit.

## 16.0 MANAGEMENT REVIEW

### 16.1 Revision and Updating

The HS&E Department will change, review and update the SMS with minor alterations being incorporated without prior approval.

The Strategic Safety Board will approve significant revisions with Major policy changes being approved at Main Board level. The Group HS&E Manager or his nominees will decide the appropriate approval level.

### 16.2 Review

The CENVE Safety and Environmental Policies and Health and Safety Management System, are formally reviewed at least annually against legislation and standards and updated as necessary.

These reviews and necessary updates and actions are initiated by the Group HS&E Manager and shall be documented, actioned and closed out to an agreed programme.

By implementation of this policy, combined with continual review to incorporate industry best practice, the CENVE Group will reaffirm its commitment to continual improvement.

.....end of Policy 1