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ADWEA HSE PROCEDURE MANUAL

HSEMS ASSESSMENT GUIDELINES

Written by:

HSE SPECIALIST

Date:

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Approved by

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DIRECTOR

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AMENDMENTS SHEET

Version	PAGE NUMBER	DESCRIPTION OF CHANGE	APPROVED BY	EFFECTIVE DATE
1	14	"Tolerable Risks " change to "Acceptable Risks" as per OSHAS 18001: 2007		
1	7	Expectation No.(1.13 ; 1.16 and 1.18) modified as per OHSAS18001:2007		
1	9	Expectation No.2.14 modified as per OHSAS18001:2007		
1	9	New expectation No.2.18 added as per OHSAS18001:2007		
1	9	Expectation No 2.09 modified as per OHSAS18001:2007		
1	11	Expectation No 3.07 modified as per OHSAS18001:2007		
1	13	Expectation No 4.12 modified as per OHSAS18001:2007		
1	13	New expectation No.4.23 added as per OHSAS18001:2007		
1	14	New expectation No.4.24 added as per OHSAS18001:2007		
1	14	New expectation No.4.25 added as per OHSAS18001:2007		
1	14	New expectation No.4.26 added as per OHSAS18001:2007		
1	14	New expectation No.4.27 added as per OHSAS18001:2007		
1	18	expectation No.6.01 modified		
1	18	New expectation No.6.08 added		
1	20	Expectation No 7.03 modified		
1	20	New expectation No.7.10 added		
1	24	New expectation No.9.24 added		
1	28	New expectation No.11.12 added		
1	30	expectation No.12.02 modified		
1	30	New expectation No.12.08 added		
1	32	New expectation No.13.12 added		
1	32	expectation No. 13.10 modified		
1	32	New expectation No.13.18 added		



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1 INTRODUCTION

This guidance document aims to assist in carrying out the internal HSEMS assessments; it may also support the ongoing HSEMS implementation work. This document should be interpreted as an example of an assessment method structured along the generic ADWEA HSEMS model.

When applying this document, the ADWEA HSE Audit Procedure should be referred to and followed.

2 ASSESSMENT METHODOLOGY

2.1 HSEMS assessment model

For the purpose of HSEMS assessment, each of the following established HSEMS elements is to be considered for assessment:

1. Commitment and Leadership
2. Organization and Competency
3. Legal and Other Requirements
4. Risk Management
5. Environmental Protection
6. Information & Documentation
7. Consultation & Communication
8. Occupational Health & Hygiene
9. Operational Control
10. Contractor Management
11. Crisis & Emergency Management
12. Incident Reporting & Investigation
13. Audit & Continuous Improvement

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2.2 Scoring System

A scoring choice is to be made by the assessors which best summarizes the observed status. With reference to Table 1, there are 5 choices. To arrive at the appropriate score, assessors should use the details as per the assessment checklists (Attachment 1) and any other notes made during the assessment.

Table 1 – HSEMS Expectation Assessment Scores

Level	Description
0	There is insufficient evidence that the key issues of this HSEMS expectation are recognized as requiring implementation. There is no implementation action ongoing or planned for the majority of the issues. Immediate management attention is required to undertake implementation.
1	The key issues of this HSEMS expectation are partially in place but they function with significant gaps and weaknesses. There are no adequate plans to implement beyond the current level of compliance. Prompt management attention is required to provide an adequate plan with appropriate resources.
2	Implementation is ongoing but progress is failing short of any planning. Appropriate management and supervisory attention is required to review the provided resources as to re-align with the original implementation planning.
3	Implementation ongoing and progressing in accordance with or better than the planning. Remaining effort can be managed with normal management and supervisory attention.
4	Fully implemented in all its detail for all relevant components.

2.3 HSEMS Assessment Checklist

The checklist Attachment 1 covers the essential issues within each element but is not designed to be exhaustive. Assessors may add detail to the checklist as considered appropriate within the context of the ongoing assessment.

2.4 Risk-Based Weighing Factor

Under constraints of time assessors usually have to prioritise their assessment topics. To assist in this, an optional weighing factor – Risk Potential (RP) has been provided to the main statements and most of the subsidiary statements. The RPs should relate to the relative risk for the company or organization as a result of non-compliance with the particular question, expectation or statement. There are four weighting factors, which are defined as follows:



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Table 2 – Risk Weighing Factors for HSEMS Assessment Issues

RP	Description
S	A serious risk weakness, which exposes the company to a major extent in terms of achievement of the corporate HSE objectives or results.
H	A high risk weakness is one that, though not serious, is essential to be brought to the attention of senior management team. This should also include any otherwise medium weakness that is a repeat finding from previous report.
M	A medium risk weakness that could result in a perceptible and undesirable effect on achievement of HSE objectives.
L	A low risk weakness, which has no major HSE impact but nevertheless, its correction will assure greater effectiveness/efficiency in managing the process, system or organization concerned.

The Weighing Factors as provided in the assessment checklist Attachment 1 are for guidance only. They may be modified at the discretion of the Assessor to reflect conditions in the individual Companies.

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ATTACHMENT 1: HSEMS AUDIT CHECKLIST

Group Company:	Assessment dates:
HSEMS Element 1: Commitment & Leadership	
ELEMENT COMPLIANCE SCORE:	

Issue No.	Issue Description	Weighing Factor	Compliance Factor
1.01	Managers lead by example and they follow company rules	H	
1.02	Staff and contractors believe that all senior managers and supervisors are serious about the priority of HSE	H	
1.03	Managers are seen to state expectations and promote plans and improvements	H	
1.04	Managers/line managers of an appropriate level lead investigations of serious incidents	M	
1.05	Top Management and all line Managers participate in work site visits and HSE meetings	M	
1.06	Employees are encouraged to communicate opportunities for improved HSE performance	H	
1.07	HSE features on agenda of all Management meetings	H	
1.08	Managers/Heads jointly develop and discuss both HSE result and activity improvement targets with the employees and contractors	H	
1.09	Managers are personally involved in the improvement effort arising from the formal Top Management review of HSEMS	S	
1.10	Managers have provided an effective structure and sufficient resources to manage and communicate HSE	S	
1.11	The Policy covers Health, Safety and Environment and states objectives of HSE performance the Company wishes to achieve.	S	
1.12	Policy is endorsed by the Company Director	S	
1.13	The Policy contains explicit statements that: - HSE is a line management responsibility - All incidents are preventable <u>- Prevention of injury and ill health.</u> - Work should be stopped/not started if unsafe, if risk is unacceptable or if it creates significant new environmental damage	H	
1.14	All contractors have HSE policies.	H	
1.15	The HSE Policy is reviewed and updated as necessary.	M	
1.16	Policy is readily available to all employees and contractors <u>and all interested parties.</u>	H	
1.17	Staff and funds are provided commensurate with plans and objectives.	S	
1.18	Strategic and SMART (Specific, Measurable, Achievable, Realistic, Time-based) HSE objectives and targets are defined which commit Company to Continuous HSE improvements, <u>and compliance with applicable legal and other requirements.</u>	S	
1.19	All levels, from Sr. Management to supervisors, are assessed on performance in achieving these objectives and targets.	H	
1.20	The Management adequately addresses resource requirements.	H	
1.21	Roles, responsibilities & authorities of personnel are determined and communicated, delegation of these when required is documented & controlled.	H	



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Group Company:	Assessment dates:
HSEMS Element 2: Organization & Competency	
ELEMENT COMPLIANCE SCORE:	

Issue No.	Issue Description	Weighing Factor	Compliance Factor
2.01	A competency evaluation system is implemented to evaluate staff in HSE critical assignments.	H	
2.02	Mandatory training requirements are defined and achieved for HSE critical jobs.	S	
2.03	Training is conducted in accordance with competency assessment results and subsequent training needs analysis.	H	
2.04	The training program meets the needs and includes existing HSE rules and procedures	H	
2.05	Training includes induction for all new staff and contractors	S	
2.06	Risks inherent in the operation or facility, the emergency procedures, shifts, leave and competency levels are taken into account in determining the resourcing level.	H	
2.07	Staff and funds are provided commensurate with plans and objectives	S	
2.08	The existing resources meet the requirements of the HSEMS in number and competency.	H	
2.09	Account is taken of: actual/forecasted activity levels, actual staff competency/experience levels/ <u>language skills</u> and manning philosophies & policies.	S	
2.10	The HSE department/unit is custodian of the HSEMS (and the other departments are responsible for implementation)	M	
2.11	The role and reporting relationship of the Head of HSE is fully defined.	M	
2.12	Responsibilities and duties of the HSE department/unit are documented and understood by the concerned personnel.	S	
2.13	Direct/indirect HSE roles and responsibilities for HSE critical jobs are documented for relevant employees and contractors.	S	
2.14	The above roles and responsibilities are provided and understood by the concerned employees and contractors <u>and ensure their adherence to the applicable HSE requirement.</u>	H	
2.15	Managers and supervisors, accept responsibility for all aspects of their subordinates HSE performance.	H	
2.16	All employees accept responsibility for their own and their colleagues' safety and health protection.	H	
2.17	Responsibilities for technical integrity of facilities are clearly defined, including setting of standards, technical validation of standards and verification of compliance with standards.	S	
<u>2.18</u>	<u>Identity of top management appointee – communicated to all persons working under the control of the organization.</u>	H	



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Group Company:	Assessment dates:
HSEMS Element 3: Legal & Other Requirements	
ELEMENT COMPLIANCE SCORE:	

Issue No.	Issue Description	Weighing Factor	Compliance Factor
3.01	There is a system in place to ensure identification of legal requirements and information is kept up-to-date.	S	
3.02	Roles and responsibilities for communication & interaction with regulatory authorities should be defined documented and communicated-It should clearly indicate responsibilities authorities and inter relationship- with regards to HSE issues	S	
3.03	Relevant staff is familiar with the applicable legal & other requirements.	H	
3.04	All applicable HSE legal requirements are identified, available, known by the concerned staff and complied with.	H	
3.05	Emerging HSE legal requirements and international standards with a view to their potential impact on existing standards and procedures.	H	
3.06	There is a mechanism to measure the compliance with applicable HSE legislation	S	
3.07	<u><i>All applicable legal and other requirements to which ADWEA subscribes are taken into account in establishing, implementing and maintaining its HSE Management System.</i></u>	H	



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Group Company:	Assessment dates:
HSEMS Element 4: Risk Management	
ELEMENT COMPLIANCE SCORE:	

Issue No.	Issue Description	Weighing Factor	Compliance Factor
4.01	The HSE hazard and effect identification process involves appropriately structured review techniques such as Health risk assessment, Environmental impact assessment and HAZOP on all facilities and operations.	S	
4.02	All occupational Health risks and hazards are identified	H	
4.03	Definitions of hazardous and toxic waste are established	H	
4.04	All safety risks and hazards are identified	H	
4.05	All environmental risks and hazards are identified	H	
4.06	All instances of soil, ground water or surface water contamination resulting from facility operation are identified	H	
4.07	Transportation (people, products and materials) is adequately covered	H	
4.08	Construction and commissioning phases are adequately covered	H	
4.09	Routine operations and maintenance are adequately covered	H	
4.10	The hazards and effects listing is kept up-to-date and modified when circumstances change.	S	
4.11	Hazards and effects assessments have been carried out for all operations and assets	S	
4.12	All Identified occupational health risks and hazards have been assessed , <u>including hazards originating outside the workplace and hazards created in the vicinity of the workplaces by work related activities under the control of ADWEA.</u>	H	
4.14	All Identified safety risks and hazards have been assessed	H	
4.15	All Identified environmental risks and hazards have been assessed	H	
4.16	The risk screening criteria takes into account probabilities of occurrence and severity of consequences for staff, public, assets and environment.	M	
4.17	Are HSE impacts identified/evaluated at the new project design, operations, maintenance & decommissioning stages.	H	
4.18	Is HSE assessment carried out for the new projects at the planning stages of activities, including disposal of assets	H	
4.19	Asses, prioritize & document risk and communicate both identified risks and risk management decisions.	M	

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HSEMS Element 4: Risk Management	
ELEMENT COMPLIANCE SCORE:	

Issue No.	Issue Description	Weighing Factor	Compliance Factor
4.20	All <u>Acceptable</u> and/or residual risks and hazards are being managed to ALARP. This applies to all occupational health, safety and environmental risks and hazards.	H	
4.21	For the design of new and modified facilities: - Locations are selected with a view to minimizing environmental impact - The control and the minimization of discharges are evaluated during design - Efficient use of energy and natural resources is a key consideration in design and development of plants and products - Soil and ground water protection and monitoring requirements have been evaluated - Suitable disposal methods for emissions, effluents and waste have been defined - Appropriate on-line monitoring facilities are provided - work place ergonomic factors are evaluated and improved during design - Plant and equipment design and material selection allows for optimum levels of asset integrity.	H	
4.22	The risk management decisions are documented and appropriately communicated.	M	
<u>4.23</u>	<u>Is Human behaviour, capabilities and other human factors are taking into consideration when assessing the risks.</u>	H	
<u>4.24</u>	<u>Changes or proposed changes in ADWEA ,its activities or material are taking into account when assessing the risk.</u>	H	
<u>4.25</u>	<u>Modifications to the HSE management system , including temporary changes, and their impacts on operations, process and activities are taking into account</u>	H	
<u>4.26</u>	<u>is the design of work areas, process, installations, machinery/equipment ,operating procedures taking into account when assessing the risk</u>	H	
<u>4.27</u>	<u>All HSE hazards and risks associated with changes in organization/HSE management system or activities are taken into account</u>	H	



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Group Company:	Assessment dates:
HSEMS Element 5: Environmental Protection	
ELEMENT COMPLIANCE SCORE:	

Issue No.	Issue Description	Weighing Factor	Compliance Factor
5.01	Are all environmental aspects identified and managed to control any potential impact on the environment.	S	
5.02	Is the Environmental performance improving and whenever technically & economically feasible and is it ensured that systems & processes are implemented that introduce environmentally safe & up-to date clean technologies.	H	
5.03	Is there evidence of compliance with company HSE policy, National & International requirements.	H	
5.04	Are energy & natural resources used economically, efficiently & effectively	H	
5.05	Are all hazardous & non-hazardous waste appropriately identified & managed.	H	
5.06	Are all hazardous Chemicals appropriately identified & managed.	H	
5.07	How does the organisation ensure that the Potable water is free from pollution.	H	
5.08	Is there a mechanism for promoting environmental awareness with-in the organization & amongst all interested parties.	M	



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Group Company:	Assessment dates:
HSEMS Element 6: Information & Documentation	
ELEMENT COMPLIANCE SCORE:	

Issue No.	Issue Description	Weighing Factor	Compliance Factor
6.01	HSE policies, <u>objectives</u> , standards, procedures and rules are in place and have been communicated to appropriate staff levels.	S	
6.02	HSE standards and procedures are appropriate to the operation and define mandatory issues, define responsibility limits of the user, clear & accurate, available where required, known & understood and systematically reviewed/updated.	H	
6.03	Standards and procedures give due regard to all critical HSE aspects e.g.: <ul style="list-style-type: none"> - Work site operations and maintenance practices and equipment e.g. permit to work, PPE, electrical tools, cranes, lifting and scaffolding. - Insurance that facilities, vehicles, and equipment with potential HSE impact are maintained in a safe and operable condition. - Contracting standards and contractor selection include review of contractor HSEMS and HSE performance. - Standards for camps, housing, food supply and sanitation which protect the health of employees and contractors. - Procedures at all levels to encourage transfer of good HSE system, programs, procedures, practices and technology. 	H	
6.04	There are adequate procedures to manage changes to and deviation from standards and procedures.	S	
6.05	An HSEMS manual is available, complete, up-to-date, contains adequate reference to the HSE procedures and any shortfalls are identified and an action plan for rectification is in place.	H	
6.06	There is an effective document control system with suitable procedures for document custodianship, approval and review/updating.	H	
6.07	Authorization to permit variance or changes is set at appropriate organizational levels.	H	
<u>6.08</u>	<u><i>There are adequate documents including records to ensure the effective planning, operation and control of process that relate to the management of HSE risks.</i></u>	H	



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HSEMS Element 7: Consultation & Communication	
ELEMENT COMPLIANCE SCORE:	

Issue No.	Issue Description	Weighing Factor	Compliance Factor
7.01	HSE policies, standards, procedures and rules have been communicated to appropriate staff levels.	H	
7.02	Formal HSE and "toolbox" meetings are held regularly for company and contractors' staff, meeting results is minuted.	M	
7.03	HSE risks & hazards associated with jobs and the potential consequences are adequately communicated to all employees and contractors <i>and other visitors to the work place.</i>	H	
7.04	The HSE implications of operation and facility changes are communicated to employees and contractors.	H	
7.05	There is a formal process to address HSE matters raised by employees, contractors, customers, government agencies and the public.	H	
7.06	Company shares HSE experience and information with sister companies and contractors.	H	
7.07	Public relations are knowledgeable of HSE issues during emergency and they are aware of what to report to concerned parties like governmental agencies and media during emergencies.	M	
7.08	Are the employees encouraged to communicate suggestions for improvement of HSE performance.	M	
7.09	Publication of HSE Bulletin	M	
7.10	Are the employee/workers participate by their appropriate involvement in: <ul style="list-style-type: none"> - hazard identification, risk assessment and determination of control - incident investigation - development and review of HSE policies and objectives - consultation where are any changes that affect their HSE - representation on HSE matter. 	H	



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HSEMS Element 8: Occupational Health & Hygiene	
ELEMENT COMPLIANCE SCORE:	

Issue No.	Issue Description	Weighing Factor	Compliance Factor
8.01	Are the occupational Health & Hygiene risks identified, categorized, controlled & Managed	S	
8.02	Is there a system in place for periodical medical check-ups for employees	H	
8.03	Is there a system in place to ensure the employees' fitness for the job	H	
8.04	Is it ensured that all workplace ergonomic factors are identified	H	
8.05	Is there an appropriate first aid system in place	H	
8.06	Are drinking water standards available?	H	
8.07	How is the hygiene of staff managed? Is it effective?	H	

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Group Company:	Assessment dates:
HSEMS Element 9: Operational Control	
ELEMENT COMPLIANCE SCORE:	

Issue No.	Issue Description	Weighing Factor	Compliance Factor
9.01	The operation and maintenance of existing facilities incorporates appropriate HSE protection measures.	H	
9.02	A permit to work system is in place and enforced	H	
9.03	Appropriate safety equipment and hardware are provided and properly inspected and maintained.	H	
9.04	Personal Protective Equipment requirements have been identified and provided.	H	
9.05	Employees and contractors are fit for duty.	M	
9.06	All discharges generated at facilities are managed to control their potential impacts on health, the local environment, business operations and cost.	H	
9.07	Discharges which are harmful to the environment are continually evaluated and reduced whenever technically and economically feasible.	H	
9.08	Efficient use of energy and natural resources is a key consideration in the operation and maintenance of facilities and plants.	H	
9.09	The disposal of hazardous and toxic waste is adequately managed.	H	
9.10	Identified instances of soil, ground water or surface water contamination resulting from facility operation are adequately managed.	H	
9.11	Systems are implemented to prevent and deal with spills and leaks.	H	
9.12	An effective waste management system is being operated.	H	
9.13	Each significant risk can be demonstrably linked to a set of controls which are either preventative and/or of a recovery nature.	H	
9.14	The quality of controls is commensurate with the risk levels.	H	
9.15	HSE hazards are managed as part of equipment or facility decommissioning.	H	



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HSEMS Element 9: Operational Control	
ELEMENT COMPLIANCE SCORE:	

Issue No.	Issue Description	Weighing Factor	Compliance Factor
9.16	Availability of adequate personnel resources, equipment, tools, services, time scale, etc. to do the work.	H	
9.17	Availability of safe workplace, safe working methods and comprehensive HSE work procedures.	H	
9.18	There is an operational plan which covers all HSE critical asset integrity related scenarios and activities.	H	
9.19	All asset integrity issues with potential HSE impact are documented.	H	
9.20	The operational plan is being adhered to and there are no significant issues outstanding which are related to asset integrity of HSE critical assets.	H	
9.21	There is an effective and documented feedback loop to review HAZOPS, HAZANS, audits, inspections, incident investigations etc.	H	
9.22	Design data, drawings and operating/maintenance manuals are up-to-date and available.	H	
9.23	There is an effective inspection program to cover company and contractors facilities and operations.	H	
<u>9.24</u>	<u>All operational control integrated to the HSE management system</u>	H	



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HSEMS AUDIT CHECKLIST

Group Company:	Assessment dates:
HSEMS Element 10: Contractor Management	
ELEMENT COMPLIANCE SCORE:	

Issue No.	Issue Description	Weighing Factor	Compliance Factor
10.01	Contractor HSE competency and performance are assessed prior to bid evaluation and/or contract award.	S	
10.02	Prior to commencing work on a contract, contractors are required to submit a description of how the HSE risks will be managed to ALARP.	H	
10.03	Contractor HSE performance is reviewed in detail prior to be allowed to mobilize or commence work.	H	
10.04	Contractor HSE performance during contract execution is audited by the Company for compliance.	H	
10.05	A procedure or clause that addresses the action to be taken in the event of different levels of non-compliance with HSE related issues is defined in the contract documents.	H	
10.06	Is there a system for appraisal and feedback of contractors' performance for improvement	H	
10.07	Is there a system for communication with the contractors	M	
10.08	Is there a system in place to ensure that contractor personnel are well trained, competent & fit for duty	M	



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Group Company:	Assessment dates:
HSEMS Element 11: Crisis & Emergency Management	
ELEMENT COMPLIANCE SCORE:	

Issue No.	Issue Description	Weighing Factor	Compliance Factor
11.01	Are the potential emergency situations identified and response plans developed for these?	H	
11.02	Recovery procedures are available in the company for general emergency and contingency planning and for managing the consequences.	H	
11.03	The recovery procedures are realistic and aim to deal effectively with medical, operational and/or environmental emergencies.	H	
11.04	All concerned personnel are familiar with their roles and responsibilities	H	
11.05	Assessments of potential emergency situations are conducted and results are used to update the recovery procedures.	S	
11.06	Emergency response plans are in place for each facility, are kept up-to-date and are understood by those who may be affected and those who will respond.	S	
11.07	The plans are realistic and adequately deal with medical, operational and environmental emergencies.	S	
11.08	The relative roles and responsibilities, contractors and emergency response agencies are understood and incorporated into the plans.	S	
11.09	An effective duty system is in place of trained duty personnel.	S	
11.10	The resources necessary to respond to emergency situations are defined, available, ready to use and periodically tested.	S	
11.11	Practices and exercises are regular with realistic scenarios covering health, safety and environment; learning points are recorded and swiftly rectified.	H	
<u>11.12</u>	<u>The needs for relevant interested parties, e.g (emergency services and neighbours) taken into account.</u>	H	



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Group Company:	Assessment dates:
HSEMS Element 12: Incident Reporting & Investigation	
ELEMENT COMPLIANCE SCORE:	

Issue No.	Issue Description	Weighing Factor	Compliance Factor
12.01	An incident reporting system is in place which, at a minimum, includes the types of incidents to be reported, the level of management to be informed and the time frame for reporting.	H	
12.02	All incidents are investigated to determine root causes, <u><i>HSE deficiencies and other factors causing or contributing to the occurrence of the incident and the corrective actions necessary to prevent their recurrence.</i></u>	H	
12.03	Corrective actions are implemented, documented and periodically assessed.	H	
12.04	Lessons learned are shared and applied laterally <u><i>for continual improvement.</i></u>	H	
12.05	Investigations involve adequately trained staff.	S	
12.06	Incident classification and potential severity is established.	M	
12.07	Investigation findings are documented and addressed in a timely manner, accountabilities assigned and tracked to closure.	M	
12.08	<u><i>All incident investigations results are documented/communicated and maintained.</i></u>	M	



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Group Company:	Assessment dates:
HSEMS Element 13: Audits & Continual Improvement	
ELEMENT COMPLIANCE SCORE:	

Issue No.	Issue Description	Weighing Factor	Compliance Factor
13.01	Periodic audits confirm that the HSEMS is functioning and there is a process in place to effectively monitor progress against HSE plan.	H	
13.02	There is an explicit company policy on HSE audits with detailed guidelines on frequency, scope, standards and team composition.	H	
13.03	There is a structured, time-based audit plan covering HSE audits for the full range of company facilities and activities, which ensures the adequacy and enforcement of the HSE rules and procedures.	H	
13.04	There is an effective, auditable system for timely audit follow up and close out and for lateral application of audit recommendations.	S	
13.05	Company provides audit training to relevant personnel.	H	
13.06	Audits are conducted with competent teams of suitable expertise.	S	
13.07	The HSE plan sets long term objectives and annually improving targets	H	
13.08	Departmental/Section HSE plans and targets are realistic and consistent with each other and with the corporate plan.	H	
13.09	Management retains an overview of the successful working of the HSEMS and stimulates continuous improvement.	M	
13.10	Management reviews HSE successes a, <u>assessing opportunities for improvement</u> and incorporates improvements to the HSEMS .	M	
13.11	Management conducts a comprehensive HSEMS review at least annually.	M	
13.12	HSE performance indicators are established and performance is measured.	H	
13.13	The HSE monitoring and performance system is responsive to developmental change (e.g. changing standards or legislation).	M	
13.14	Company and Department/section HSE performance is regularly reviewed against targets and action plan.	H	
13.15	Compliance with policies, standards, procedures and rules is actively pursued.	H	
13.16	Supervisors regularly check the work of subordinates and provide remedial advice as needed.	H	
13.17	Line Management is empowered to reward compliance as well as to eliminate repeated violations.	M	
13.18	<u>Monitoring the effectiveness of controls(for health and safety)</u>	H	



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