



Level 2, 263 Mary Street  
Richmond VIC 3121  
[www.pacia.org.au](http://www.pacia.org.au)  
Ph : (03) 9429 0670  
Fax : (03) 9429 0690

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## **A PUBLIC COMMITMENT**

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**Plastics and Chemicals Industries Association**

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CODE OF PRACTICE

**Employee Health And Safety**

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# **EMPLOYEE HEALTH AND SAFETY**

## **INTRODUCTION**

### **Purpose**

This Code governs member company action regarding health and safety of people involved in operational activities, particularly in order to fulfil the Guiding Principle of Responsible Care which states “:

“In consultation with our stakeholders we will manage all our activities to ensure the preservation of the environment, protection of the health and safety of employees and the community and a standard of performance the public has a right to expect”.

Education / training of employees and prevention of incidents is fundamental to the achievement of the purpose of this code. Prevention only occurs when there is a conscious systematic effort to make it happen.

It should be noted that many companies have tailored quality, environment and safety systems such as ISO 9001 and ISO 14001. Implementing equivalent elements from those systems would meet the requirements of this Code of Practice. Where a company does not have a recognised management system, this Code of Practice provides guidance for sound Responsible Care practices. Implementation of management practice equivalent to the examples given with appropriate evidence of actions to achieve compliance with the Policy intent is acceptable.

### **Scope**

The Code covers all activities carried out by employees of member companies and contractors and especially those involved in manufacturing, in recognition of the generally more hazardous nature of these areas of operation.

The Code therefore interfaces with all of the other Responsible Care codes and in particular with the Manufacturing Process Safety Code. Benefit would also be gained from reference to other PACIA publications on specific to certain high hazard materials, such as acrylonitrile, hydrofluoric acid and sodium cyanide.

### **Philosophy**

Responsible Care and this Code in particular begin with the premise that all unplanned incidents and occupational illnesses and injuries are preventable.

Each member company will establish and implement appropriately documented processes covering policies, standards and procedures which govern the health and the safety of the people directly involved in their operations, particularly during the manufacture of chemicals and chemical products. These policies, standards and procedures will meet or exceed all applicable laws and regulations in letter and in spirit.

Each member company will also act to ensure that contractors and outside processors meet the purpose of this Code in contracted operations performed for member companies. Those concerned will be provided with information and support for the management of hazards and risks associated with contracted operations.

## MANAGEMENT PRACTICES

Code Section/ Management Practice	Examples of acceptable implementation of management practice
<p><b>1     <u>COMMITMENT AND LEADERSHIP</u></b></p>	
<p><b>1.1    Policy</b></p> <p>Employee Health and Safety (H&amp;S) shall be incorporated into the culture and core philosophy of each company and implementation shall require senior management leadership through individual commitment, active participation, publishing of written policies and procedures and effective communication. Policies and Standards shall meet or exceed all legal requirements in letter and in spirit.</p>	<p>1.1   (a)   Published policy making specific reference to Employee Health and Safety (H&amp;S) is displayed prominently at each location and by each major business unit. This could be by means of the Responsible Care Guiding Principles</p> <p>      (b)   CEO and senior management make their commitment to employee health and safety clear by regular face to face and written communications, including agenda items at regular meetings of senior management.</p>
<p><b>1.2    Accountability</b></p> <p>Commensurate with operational risks, goals and responsibilities for developing and implementing Health and Safety programs throughout the organisation shall be established.</p>	<p>1.2   (a)   Job descriptions (or equivalent) throughout the company include responsibilities for contributing to H&amp;S programs.</p> <p>      (b)   Appraisal systems and rewards reflect the level of individual and team commitment to these responsibilities.</p>
<p><b>1.3    Resources</b></p> <p>Each company shall commit the appropriate financial, time and human resources necessary to implement programs and to maintain and continually improve health and safety performance. Line functions shall be properly supported by qualified and/or experienced health and safety professionals.</p>	<p>1.3   (a)   Senior management regularly assess, provide and document the resources necessary to implement H&amp;S programs in accordance with policy and management directives.</p>
<p><b>1.4    Employee Participation</b></p> <p>Each company shall provide opportunities for employees to participate in developing, implementing and reviewing H&amp;S programs, thereby sharing the leadership with all levels of the organisation.</p>	<p>1.4   (a)   A culture is established whereby employees at all levels are encouraged to share the leadership, particularly by processes to voice their concerns and to make suggestions for improvement.</p> <p>      (b)   H&amp;S is a regular agenda item at team meetings / briefings.</p> <p>      (c)   These processes are appropriately documented and timely feedback given to all participants.</p>

## 2 **RISK ASSESSMENT AND PLANNING**

### 2.1 **Hazard Identification and Risk Assessment**

#### 2.1.1 **Hazard Identification**

Each company shall systematically record potential hazards associated with planned or existing operations and maintenance, with particular emphasis on changes in facilities or procedures. Reference shall be made to all relevant regulatory requirements, with particular emphasis on manual handling and repetitive activities.

- 2.1.1 (a) There is an on-going process for existing, new or modified facilities which places particular emphasis on systematically identifying and documenting potential hazards which materials and processes pose for those directly involved in operating and maintenance.
- (b) Each individual job is considered to identify and document potential hazards, not only from chemicals but also the potential for other types of injury, especially strains, sprains and other problems associated with manual handling and repetitive activities.
- (c) Job Hazards are regularly reviewed to take into account changes which occur, and feedback from incident and injury investigation.

#### 2.1.2 **Risk Assessment**

Systems shall be established for exposure assessment and safety analyses to assess the risk to employees from processes; equipment; potentially hazardous chemical, physical, or biological agents; or other work place conditions.

- 2.1.2 (a) Systematic procedures are followed to analyse and assess the risk to employees from the hazards as listed in this management practice and identified in accordance with 2.1.1
- (b) Risk assessment procedures take into account the amount, toxicity and opportunities for exposure to chemicals handled. Where necessary this leads to the carrying out of a more in-depth assessment using techniques such as Hazop and Hazan.
- (c) Risks are assessed by appropriately trained and qualified people, with documentation of the analysis and of recommended actions.
- (d) Employees concerned are fully involved.

### 2.2 **Legal/Other Requirements**

Each company shall establish systems to identify and maintain knowledge of legal requirements and industry best practice in relation to H&S issues.

- 2.2 (a) Formal systems are maintained for identifying and keeping up to date on legal requirements for occupational health and safety; with particular emphasis on Dangerous Goods and Hazardous Substances and where appropriate, Major Hazard Facilities.
- (b) Company representatives participate actively in industry and technical forums to keep up to date on best practice and share experience.
- (c) Company representatives participate actively in industry processes to assist in developing appropriate new laws.

**Code Section/ Management Practice**

**Examples of acceptable implementation of management practice**

**2.3 Objectives**

Senior management shall highlight the importance of health and safety by establishing it as an essential and integral part of the planning process throughout the organisation. Clear direction and goals shall be set for continued improvement in health and safety performance.

**2.4 Management Plans**

Management shall develop an overall health and safety plan in consultation with its employees and with contractors, which establishes appropriate standards and ensures adequate resources are made available. The plan shall ensure a visible commitment of the organisation and accountability for its achievement shall be clearly assigned at all levels. It shall be structured so that progress towards the objectives can be measured.

**3. IMPLEMENTATION**

**3.1 Structure and Responsibility**

Each company shall establish a formal structure for the implementation for this Code, which includes defined roles, responsibilities and authorities for an overall co-ordinator and for individual operating area co-ordinators, as appropriate for the size and complexity of the company. These co-ordinators shall interface closely with responsible line functions and supporting experts.

- 2.3 (a) Statements of strategic direction and expectations make specific reference to the maintenance and improvement of employee health and safety performance.
- 2.3 (b) Overall goals for H&S include improvement in statistical indicators of performance, but also place emphasis on positive indicators of safe conditions.
- 2.3 (c) Overall expectations are translated into specific objectives for each significant operating unit.
  
- 2.4 (a) Specific plans are developed for H&S management and performance improvement for each business area and / or operating unit.
- 2.4 (b) Plans specify not only the measurement of performance but also the means by which improvements are to be achieved.
- 2.4 (c) Plans and programs allocate specific responsibilities and the required timing.
  
- 3.1 (a) There is an overall co-ordinator or team for H&S and a network of area co-ordinators or equivalent; as appropriate.
- 3.1 (b) There are formal consultation processes between co-ordinators and other employees, with support as required from health and safety professionals.

## 3.2 Training, Awareness and Competence

### 3.2.1 Health and Safety Information

Each company shall establish and maintain an inventory of all materials used on site and a repository of information on health and safety hazards and controls; at least in accordance with legal requirements, but also aiming for industry best practice. This information shall be made freely available to both company and contract employees.

### 3.2.2 Job Skills and Descriptions

Each company shall identify and document the skills and knowledge necessary to perform each job properly; and for the regular assessment of employee competency. Job descriptions (or equivalent) shall include a clear statement of each person's function, authorities and responsibilities.

### 3.2.3 Education and Training

Each company shall educate and train all employees on the hazards associated with their job; and the required procedures and controls necessary to minimise these hazards. Specific training shall be conducted on emergency preparedness and response. They shall also implement a system, which encourages employees to report previously unrecognised hazards or inadequate job methods/instructions. Training programs shall recognise the need for retraining at regular intervals.

- 3.2.1 (a) There is a compiled inventory of all raw materials, intermediates, waste streams and products associated with each process and / or operating unit.
- (b) There are current material safety data sheets (MSDS) for all chemicals included in the inventory; available and readily accessible to all employees and contractors.
- (c) Published information includes specific controls necessary to handle the materials safety, either included in the MSDS or the particular work site instructions, or both.
- (d) Additional information and warnings are provided as required, covering non-chemical issues such as manual handling, machine guarding, hearing conservation and eye protection.
- 3.2.2 (a) Skills and knowledge required to carry out job functions safely are identified and documented; at least for higher risk processes and jobs handling hazardous materials.
- (b) Processes are in place for regular assessment of employee competency, especially on health and safety aspects of the job.
- (c) Job descriptions (or equivalent) are prepared, at least for higher risk jobs; which include clear statements of each person's functions, authorities and responsibilities.
- 3.2.3 (a) Formal training programs are in place for the hazards associated with the job, at least for all people directly exposed to workplace hazards, and covering all of the identified needs.
- (b) Particular emphasis is placed on the interpretation/use of MSDS; and on training requirements for new or modified processes or equipment.
- (c) Training programs have features at least including:
- Structured training sessions and competency assessment before accepting responsibility.
  - Regular retraining on competency gaps
  - Tailored to specific job requirements
  - Regularly up-dated to include new information.

Code Section/ Management Practice	Examples of acceptable implementation of management practice
<p><b>3.3 Communications</b></p> <p><b>3.3.1 Employee Consultative Processes</b></p> <p>Each company shall establish formal processes for active involvement and encouragement of all employees for the development and implementation of health and safety programs and initiatives; at least in accordance with legal requirements.</p> <p><b>3.3.2 Contractors and outside Processors</b></p> <p>Each company shall establish consultation processes with on-site contractors and outside processors, commensurate with the risks inherent to their activities. Close and active communication shall be demonstrated with contractor management and employees. Processes shall include appropriate training and formal induction programs for all on-site contractor employees.</p>	<p>3.3.1 (a) Consultation processes are operating actively to maintain face to face dialogue with employees on H&amp;S issues and Management Plans</p> <p>(b) Processes are two-way, both providing information and encouraging input on concerns and recommendations for improvement.</p> <p>(c) Processes are appropriately structured and documented, at least in accordance with legal requirements.</p> <p>3.3.2 (a) Documented consideration takes place of the extent of information and consultation needed with on-site contractors and outside processors regarding H&amp;S issues involved in their activities for the company.</p> <p>(b) Consultation regularly takes place, consistent with the level of risk. Communications are both face to face and written.</p> <p>(c) Consultation and training includes assessment of individual contractor employee competency regarding hazards associated with their activities.</p> <p>(d) Particular emphasis is placed on formal induction programs for all on-site contractor employees.</p>
<p><b>3.4 Documentation</b></p> <p>Each company shall establish and maintain appropriate written documents necessary to maintain standards and implement the health and safety programs/procedures. The level of detail in procedures shall be commensurate with the risk, with the emphasis on assisting the health and safety process but not driving it.</p>	<p>3.4 (a) The documents necessary to set up and implement the practices required to meet this Code are identified and planned.</p> <p>(b) Documentation is properly developed and maintained.</p>
<p><b>3.5 Document Control</b></p> <p>Each company shall establish and maintain systems to regularly review and update health and safety information and guidance; and to ensure that all stakeholders use only the most up to date document. Documents may be in paper or electronic form.</p>	<p>3.5 (a) Documentation on the H&amp;S information, programs and procedures is regularly reviewed and updated; and only the most up to date version is used.</p>

Code Section/ Management Practice	Examples of acceptable implementation of management practice
<p><b>3.6 Operational Control</b></p> <p><b>3.6.1 Process Development and Design</b></p> <p>Each company shall make health and safety of personnel a key consideration when designing, developing or improving processes and equipment. Refer to the Manufacturing Process Safety and Product Stewardship Codes of Practice for greater detail.</p> <p><b>3.6.2 Risk Control Measures</b></p> <p>Each company shall establish and put in place control measures appropriate to the risks; taking into account the following hierarchy of controls; inherent safe design, material substitution, engineering controls, administrative controls and personal protective equipment.</p> <p><b>3.6.3 Operating Procedures</b></p> <p>Systems and documented procedures shall be maintained to ensure safe operation of equipment and proper control, storage and handling of all substances used or produced in the process; to minimise health and safety risks to employees, contractors, visitors and neighbours. Procedures shall be written in a language and style appropriate to the needs of the users.</p>	<p>3.6.1 (a) The results of hazard identification and evaluation, as required by Section 2.1 of this Code, are formally implemented as part of the process of developing, designing or modifying processes and equipment. Documentation demonstrates this linkage.</p> <p>(b) Design standards and operating procedures for modified processes are at least equivalent to the original design.</p> <p>3.6.2 (a) Control measures are put in place consistent with the design and operating specifications.</p> <p>(b) Control measures demonstrate that the hierarchy of controls outlined in this management practice has been considered and acted upon, particularly for processes with a potential for exposure to hazardous materials.</p> <p>3.6.3 (a) Written operating instructions are available and in on-going use, at least for higher risk processes and those handling Dangerous Goods or Hazardous Substances.</p> <p>(b) Operating instructions emphasise the H&amp;S risks associated with the processes or equipment; and the control measures which are in place.</p> <p>(c) Literacy and language requirements of employees have been considered when developing operating instructions and control measures.</p>



Code Section/ Management Practice	Examples of acceptable implementation of management practice
<p><b>3.6.4 Safe Work Permits</b></p> <p>Work permit systems shall be used to protect personnel from exposure to any hazardous condition arising during plant maintenance or unusual operation. The system will include permits for mechanical work, hot work, confined space work, electrical isolation and other relevant risk categories. Special emphasis shall be placed on communications between operating and maintenance personnel.</p>	<p>3.6.4 (a) Written procedures are available and used for the preparation, handover, monitoring and handback of systems and equipment for maintenance or non-routine operating activities.</p> <p>(b) Procedures for safe work permits recognise the potential for more than one job occurring simultaneously and the involvement of multiple trades.</p> <p>(c) Procedures and implementation place emphasis on face to face communication between operating and maintenance personnel at all stages of the job.</p> <p>(d) Procedures require formal acceptance of responsibilities including appropriate sign-off by;</p> <ul style="list-style-type: none"> <li>• People responsible for the issue and receipt of the safe work permit;</li> <li>• Those actually required to carry out the work;</li> <li>• Those handing back and accepting the equipment ready for operation.</li> </ul>
<p><b>3.6.5 Maintenance Procedures</b></p> <p>Procedures for maintenance shall be documented and implemented to ensure the safety of those undertaking the maintenance; and be based on formal job safety analysis commensurate with the risk.</p>	<p>3.6.5 (a) The need for specific written instructions for the safe carrying out of maintenance work on high risk complex or critical equipment or systems has been considered and documented.</p> <p>(b) Evaluation of the need for formal instructions is based on job safety analysis or equivalent.</p> <p>(c) Maintenance procedures in general recognise the potential for residual contamination of equipment with process materials.</p> <p>(d) Work is performed by properly trained and / or qualified people; and supervised appropriately.</p>
<p><b>3.6.6 Medical Fitness and Surveillance</b></p> <p>A formal system shall be established and maintained to assess employee medical fitness for the work to be assigned and for employee occupational medical surveillance tailored to workplace hazards</p>	<p>3.6.6 (a) A system is in place to assess the health and physical fitness of employees to carry out their specific job tasks.</p> <p>(b) Medical fitness programs are resourced by an appropriately qualified health professional and medical information security is maintained.</p> <p>(c) Programs for medical fitness recognise the potential for substance abuse.</p> <p>(d) Occupational Health surveillance assessments are conducted for those employees with potential exposures to specific agents, in order to identify potentially adverse health effects.</p> <p>(e) Appropriate communications take place with the employees affected by this management practice.</p>

Code Section/ Management Practice	Examples of acceptable implementation of management practice
<p><b>3.6.7 Housekeeping Programs</b></p> <p>A formal program shall be established to emphasise and maintain high standards of housekeeping in order to preserve the safety of facilities, tools and equipment for those undertaking the work.</p>	<p>3.6.7 (a) Each workplace has in operation an on-going program of good housekeeping, appropriate to the nature of the operation and the potential risks.</p> <p>(b) Housekeeping programs actively involve employees at all levels; including senior management.</p>
<p><b>3.6.8 Selection of Suppliers and Contractors</b></p> <p>Each company shall identify and select appropriate suppliers and contractors who will implement and monitor proper health and safety practices. Commercial considerations shall not out-weigh the need for H&amp;S commitment.</p>	<p>3.6.8 (a) Procedures for the selection of suppliers and contractors take account of their H&amp;S commitment and “track record”.</p> <p>(b) Health and Safety professionals, as appropriate, are involved in the development and operation of the selection process.</p>
<p><b>3.7 Emergency Preparedness and Response</b></p>	
<p><b>3.7.1 Health, Safety and Emergency Equipment</b></p> <p>Systems shall be in place to ensure that appropriate health and safety equipment is provided or available and is properly selected, maintained and used. Equipment provided is consistent with the facility design and or on-going risk assessment.</p>	<p>3.7.1 (a) Health, Safety and Emergency equipment is provided or available as part of the facility design or as a result of a subsequent on-going risk assessment.</p> <p>(b) This equipment has been selected by people with the appropriate training and experience and is maintained at least according to manufacturer’s recommendations.</p> <p>(c) All employees required to use the equipment are appropriately trained.</p>
<p><b>3.7.2 First Aid Arrangements</b></p> <p>Provision shall be made for effective First Aid assistance to people suffering less serious occupational injuries or illness; and for prompt referral of more serious cases.</p>	<p>3.7.2 (a) First Aid facilities are provided which meet or exceed the requirements of relevant Standards or Regulations.</p> <p>(b) Arrangements are in place for the prompt treatment of less serious occupational injuries or illnesses by suitably qualified people, readily available whenever people are potentially exposed.</p> <p>(c) Close communications and planned arrangements are in place for the prompt referral of more serious cases to appropriately resourced emergency medical facilities.</p> <p>(d) Arrangements for both on-site and off-site medical treatment include the people involved being made familiar with any special hazards or agents present in the particular workplace.</p>

**Code Section/ Management Practice****Examples of acceptable implementation of management practice****3.7.3 Emergency Plans and Procedures**

Formal emergency response systems and plans shall be developed and place primary emphasis on the health and safety of employees, contractors, visitors and the public. The plans shall be tested regularly.

- 3.7.3 (a) Emergency plans and procedures include features which place primary emphasis on the health and safety of employees, contractors and emergency response agencies directly involved in the incident.
- (b) Plans recognise the potential for impact on visitors and, in the event of off-site effects, the surrounding community. Where appropriate, emergency plans are integrated with any existing community disaster plan or equivalent.

**4 PERFORMANCE MEASUREMENT AND CORRECTIVE ACTION****4.1 Monitoring and Measurement****4.1.1 Workplace Inspection**

A system shall be maintained requiring regular monitoring and inspection of the workplace and confirmation of continued use of correct procedures.

- 4.1.1 (a) Regular inspections of the workplace are carried out and documented, with the aim of identifying poor housekeeping and unrecognised hazards.
- (b) Continued correct use of procedures and protective equipment is confirmed by regular workplace audits, or equivalent. Results of these audits are appropriately documented. Particular emphasis is placed on safe work permit procedures
- (c) Workplace inspections place emphasis on reviewing whether hazards can be eliminated and, if not, ensuring that protective controls, such as machine guarding, are in operation and effective.

**4.1.2 Industrial Hygiene Monitoring**

Occupational health surveillance assessments shall be conducted for those employees with potential exposures to specific agents to identify potentially adverse health effects; at least in accordance with legal requirements.

- 4.1.2 (a) There is an on-going program of Industrial Hygiene monitoring of the workplace and of employees with potential exposure to particular Hazardous Substances; appropriate to the risk and at least in compliance with legal requirements.
- (b) Monitoring programs are carried out by suitably qualified people and in close consultation with the people directly involved.
- (c) Results of monitoring programs are communicated promptly to the individual(s) involved, and to others with a need to know, taking into account the right to privacy of the people concerned.

Code Section/ Management Practice	Examples of acceptable implementation of management practice
<p><b>4.1.3 Reporting of Injury/Illness</b></p> <p>Each company shall establish a culture of compulsory reporting of all injuries and illnesses occurring in the workplace, supported by attitudes/actions of management, with a policy of “no blame”. The culture shall also encourage reporting of incidents and near-misses where no injury occurs.</p>	<p>4.1.3 (a) Management and team leaders ensure, by written communications and face to face consultation, that compulsory reporting of work related injuries and illnesses is both understood and carried out.</p> <p>(b) Appropriate documentation and procedures are readily available to facilitate reporting of injuries and illnesses. Injuries are being reported, as required.</p> <p>(c) Documented procedures are in place to encourage all employees to report incidents and near misses even if no injury occurs. Incident reports are being raised.</p>
<p><b>4.1.4 Incident Recording</b></p> <p>Individual incidents, accidents and illnesses shall be recorded and trends in health and safety developed for analysis, leading to corrective action.</p>	<p>4.1.4 (a) Details of individual injuries, illnesses and incidents are recorded in a form suitable for development of trends and further analysis, with a view to determining corrective/preventative action.</p>
<p><b>4.1.5 Community Impact</b></p> <p>Companies shall assist Government Authority monitoring of community health in response to a situation where employee health trend data, applicable studies in other locations or the nature and level of the material involved give reason for concern. Privacy of personal information shall be protected.</p>	<p>4.1.5 (a) Relevant H&amp;S information is regularly reviewed to identify any potential concerns regarding impact on the surrounding community. Privacy of personal information is protected.</p> <p>(b) Senior management make it clear to employees that the company will co-operate actively with relevant Government Authorities in the monitoring of community health should there be reason for concern. If appropriate, such co-operation is occurring in practice.</p>
<p><b>4.1.6 Progress on H&amp;S Programs</b></p> <p>Each company shall review and report regularly on progress towards achieving the goals of the health and safety programs for each workplace, area or company sector.</p>	<p>4.1.6 (a) Individuals and teams with goals for the development and implementation of H&amp;S programs report regularly on progress toward these goals.</p>

**4.2 Incident Analysis and Corrective Action****4.2.1 Injury/Incident Investigation**

An injury/incident investigation system and procedures shall be established including near misses. A team approach is preferred, with the emphasis on determining “root causes” and contributing factors without assigning blame. The team should recommend corrective action, in the spirit of continual improvement.

- 4.2.1 (a) Documented injury/incident investigation procedures are established and in use.
- (b) Procedures require consultation with any injured person, if possible, and other witnesses and team members.
- (c) The people doing the investigation are supported by additional expertise, where required.
- (d) Investigations aim at establishing fundamental causes and contributing factors; and result in recommendations for corrective/preventative action.
- (e) Lessons learned are discussed with employees.

**4.2.2 Corrective/Preventative Action**

Procedures shall provide for documentation and follow up on corrective and/or preventative action deemed necessary on incidents and inappropriate practices; including near misses. Actions include effective treatment and rehabilitation of injured or ill persons; with programs for timely return to work, as appropriate.

- 4.2.2 (a) Prompt decisions are made on corrective/preventative actions, and responsibility/timing is clearly assigned.
- (b) Regular follow-up and reporting is taking place on progress towards planned action.
- (c) Those involved in the original investigation, and in particular person(s) injured or making the report, are kept informed of decisions on planned action and progress towards completion.
- (d) There are active programs to identify alternate duties and facilitate a timely return to work for injured persons.

**4.3 Records**

Each company shall ensure that the records necessary to implement the requirements of this Code are prepared, retained in good order and accessible to those requiring the information.

- 4.3 (a) Teams/individuals responsible for H&S systems and programs have considered formally what records are necessary to enable the implementation of this Code and to meet legal requirements.
- (b) Records are established and maintained in good order, at least in accordance with legal requirements.

**4.4 System Audit**

Each company shall maintain procedures for the regular audit of the operation and effectiveness of the systems and procedures for Employee Health and Safety and to provide appropriate reporting to Management and other stakeholders.

- 4.4 (a) A regular audit (at least every two years) takes place on the implementation and effectiveness of the agreed systems and procedures for H&S.
- (b) Audits may be internal and/or external, as appropriate.
- (c) The results of these audits are reported to the appropriate level of senior management.

## 5. MANAGEMENT REVIEW

### 5.1 Review of Code Requirements

The CEO (or equivalent) of each company or major business unit shall become familiar with and review the requirements of the Code with appropriate members of senior management.

### 5.2 Review of Progress

At least every two years, the CEO (or equivalent) shall demonstrate commitment by actions including:

- Initiating a self-assessment on implementation of the Code.
- Review feedback from the assessment with appropriate personnel.
- Initiating and approving agreed plans.
- Reviewing the results from implementation of the agreed plans.

### 5.3 Program Review and Up-Grade

The overall Employee Health and Safety Program and compliance with this Code shall be reviewed and the program up-graded at least every two years.

### 5.4 Industry Performance Profiles

It is important that the industry compile and report on overall code compliance. To this end, the CEO shall ensure that the results of the self-assessment are reported to PACIA in accordance with the agreed format and timetable. The CEO shall also ensure that the company responds to PACIA surveys on other performance indicators, as decided by the PACIA Board. The CEO shall confirm agreement for the company data to be included in the PACIA public reporting.

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| 5.1 | (a) | There is direct involvement by the CEO (or equivalent) in reviewing the requirements of this Code, at least with the overall Code Co-ordinator, but preferably with the implementation team.   |
|     | (b) | Evidence exists that this process is repeated at least whenever new personnel become involved.   |
| 5.2 | (a) | There is direct involvement by the CEO (or equivalent) in all of the activities listed in management practice 5.2  |
|     | (b) | The self-assessment covers at least all the items in these self-assessment criteria for the Code, preferably in the format to be used for reporting to PACIA in accordance with the agreed program   |
|     | (c) | The agreed plans are endorsed formally by the CEO (or equivalent) and communicated widely.   |
| 5.3 | (a) | A system is in place for formal assessment of system audit findings and appropriate corrective action  |
|     | (b) | In addition to the regular systems reviews, evidence exists of a periodic overview of the plans and Code compliance with regard to strategic direction and policy consideration, specifically targeted at upgrade of the plans and for input to PACIA on improvements to the Code. |
| 5.4 | (a) | Self-assessments on the Employee Health and Safety Code are completed and forwarded to PACIA within the agreed time frame.   |
|     | (b) | Company response to all other PACIA surveys on H&S related performance indicators is completed within the agreed time frame.   |
|     | (c) | Formal CEO agreement for inclusion of company data in public reporting of industry performance is given.   |