GUIDELINES FOR DEVELOPING AND IMPLEMENTING A WORKPLACE HEALTH AND SAFETY POLICY

What does the MHSA say?

Section 8 of the MHSA describes what the occupational health and safety policy is; what you should put in it, and how you should go about preparing it, making people know about it and making sure that they understand their responsibilities to put it into practice.

Section 8 (1) of the MHSA states that your Manager must put in place a health and safety policy document which:

- Shows how you organise work at your mine.
- Establishes a policy to protect the health and safety of the people who work for you.
- Sets out the ways and means that will enable you put into practice the policy and make changes when needed.

Section 8 (2) of the MHSA says that in preparing or making changes to the policy, the manager must consult workers through the health and safety committee and, Section 8 (3) of the MHSA states that you must display the policy openly at places in the workplace so that workers can see it, read and understand; the Manager must give a copy to each health and safety representative.

What does a health and safety policy mean?

A general health and safety policy is a document which shows clearly senior management’s, or your commitment and approach in providing and maintaining a healthy and safe work environment to comply with what MHSA wants you to do. As an employer, you must have a document, which states your principles and instructions on health and safety actions at your mine. The policy tells your workers, sub-contractors and their workers, suppliers and other clients about your vision, direction and goals for health and safety at work and your commitment to achieving them.

Why do you need a general health and safety policy?

As an employer, the health and safety policy you put in place is your commitment to provide a healthy and safe workplace and to comply with MHSA requirements. When you write your policy and authorise it to be effective at the mine, this enables you to:

- Show your leadership’s personal and corporate commitment to a healthy and safe workplace.
- Make your employees to understand that health and safety is of highest importance throughout the organisation and that any unsafe practices would not be acceptable
- The level of health and safety performance at mine is determined by the amount of your commitment to it just as your commitment to quality determines the actual quality of your products.
- A written policy sends a clear message to everyone from top management that it values the health, safety and wellbeing of your workers.
Show that the health and safety policy is the starting point to establishing a health and safety programme at work and is at the centre of all health and safety activities at the mine.

What is a comprehensive health and safety policy?

A comprehensive policy is one which:

- Expresses senior management commitment to protect the health and safety of employees.
- Clearly identifies and states the objectives of the health and safety programme.
- States the company’s vision or direction for health and safety so that people should know and understand it.
- Shows who is answerable for the health and safety programmes.
- States what the general responsibilities of employees for health and safety are.
- States clearly that health and safety will not be sacrificed for any one’s convenience.
- States clearly that unsafe behaviour will not be acceptable.

Your health and safety policy is a statement of principles and general rules that must be brought to life with action. Once this is done, it becomes a breathing thing that will consistently change with time as the law, technology, job functions and business activities change.

Main areas of focus that should be included in your policy statement

Your health and safety policy is a statement of your intent and should contain:

- Your vision or direction to health and safety in your company, for example a statement that the employer will provide workers a healthy and safe workplace and health and safety will be integrated in everyday work activity in the mine.
- Your senior management’s commitment to health and safety for example, a statement expressing your duty of care to your workers and saying that you will do everything that can be done to prevent injury or illness to a worker. For example, you can state that:
  - You will make sure that workers are provided adequate information about the hazards and risks of their work and they are given training so that they can learn how to do their work in a healthy and safe way.
  - You will provide staff whose job is to see that work is done in a safe manner.
- What you want your health and safety programme to achieve. These are the company’s health and safety goals or objectives e.g. state that you intend to provide and maintain a workplace free of injury and illness, or that you will strive to achieve zero harm to anyone at work and the environment.
- The identity of the people who will be responsible and answerable for putting into practice the elements of your health and safety programme.
- The responsibility of workers and other persons in the workplace by including a statement that all workers must take care to make sure that the workplace is healthy and safe for work and if not to explain why.
- A statement that bad health and safety behaviour will not be acceptable.
- A statement that you will work with everyone in the company to make sure what the policy advises is put into practice.
- A statement that the policy will be checked at least once a year to ensure that it is working well and to follow any changes in the law and the workplace itself.
Principles you should include in your policy statement

To ensure that you are complying with the law, it is a good idea to include the following principles in your policy statement:

- Working in a safe and healthy way is a condition for employment at your mine.
- Health and safety is everyone’s responsibility.
- Everyone is accountable for his or her health and safety performance.
- Health and safety is a priority and is given equal importance as production, cost control and quality.
- All hazards will be identified and removed or controlled.
- Health and safety training and supervision of workers will be consistent and on-going.
- Health and safety meetings will be held regularly.
- Regular workplace inspections will be conducted at the mine.
- All accidents, incidents, near misses and work-related illnesses will be reported and investigated and action taken to prevent reoccurrence.

Who should know about the policy?

- All employees should know about the policy including their duties under the policy.
- Your suppliers, contractors/sub-contractors and their workers.
- Your clients.
- New employees during induction training.

Make sure you train managers, supervisors, workers, health and safety representatives and committee members to carry out their duties in the policy properly

What do you need to do to ensure that your policy works well: the formal aspects?

You have no intention of locking up your policy in your drawers. You want to put it into practice. For your policy to be put into practice properly and work well you should do the following:

- Make sure the owner, Chief Executive Officer (CEO) or General Manager and an employees’ representative have signed and authorized the policy.
- Make sure you have told all new employees about the policy as part of your hiring process.
- Send a copy to each health and safety representative who is the direct link between your management and employees and can explain the contents to them better and make sure it is followed throughout the organisation. This is also a MHSA requirement (Section 8 (3)).
- You can use the policy to introduce your health and safety programme during induction for new workers.
- Make sure your workers understand the policy by putting it in simple language and if possible their local language.
- State clearly who will be responsible and answerable for putting the policy into action.
- Provide money and people to put the policy into practice and make it work.
- The most senior manager, e.g. the General Manager and the representative of your workers must sign the policy.
- State that you attach equal importance to health and safety as other business
policies of the company.
- State that the policy must be followed in all work activities.
- State a time frame for revising and updating the policy.
- Tell your suppliers, contractors, subcontractors and clients about the policy and your health and safety programme.
- Ensure you date, review and sign the policy every year.

Statement of intent

The policy statement of intent clearly:

- States the goals of the company in health and safety, e.g. “to be the safest mine in South Africa;” the objectives of the company in health and safety, e.g. “to maintain a workplace free of injury or illness”; “To comply with all relevant occupational health and safety legislation, regulations, internal standards and collective agreements relating to health and safety at work”, and management commitment to achieve the goals and objectives.
- Describes the duties and responsibilities of everyone at all levels of the organisation in ensuring and promoting health and safety at work.
- Acknowledge that employees are an important resource to the company and their wellbeing is of utmost importance.

How do you prepare policy goals and objectives?

- Firstly, you should state your organisation’s health and safety management goals. Your health and safety management goals are to:
  - Meet the legal requirements or standards that apply to mining, e.g. MHSA and Regulations and other related legislation.
  - Ensure that the workplace is as far as is reasonably practicable safe and without risk to health for employees.

These are your primary health and safety objectives and are stated in Section 2 of the MHSA.

An Example of how you state a general objective

“Gauteng Mining will foster a healthy, safe, satisfying and non-discriminatory work environment”.

You need to determine what you will do to achieve your more general objective. In some cases the law may tell you what to do.

In your policy you state the objective and then ways you intend to achieve it, for example state that you will ensure a safe and healthy work environment by:

- Managing health and safety in an effective way in which senior management shows commitment to and personal involvement in health and safety at all levels of the company.
- Planning and controlling work to avoid conditions or situations that can cause harm to employees.
- Providing facilities and equipment to ensure safe and healthy conditions of work.
- Providing information, education, training and supervision to ensure workers do their
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job in a safe and health manner.

- Ensuring teamwork, proper two-way communication as part and parcel of every job at the mine.

The above are your more specific objectives and you also need to work out how you will go about achieving them, i.e. develop the programmes to meet the specific objectives, e.g. your training programme, risk management programme, programme for maintenance of work equipment, programme for the selection and provision of PPE, etc. Other specific objectives of your health and safety policy relate to your health and safety strategies, commitment, roles and responsibilities (functions) and the workplace environment.

State your strategic goals

State for example that:

- You will develop health and safety strategies every year to promote workplace health and safety performance.
- Health and safety systems and programmes will be consistently checked, reviewed and revised as an on-going exercise to improve standards and ensure they are working well.

State your commitment and responsibility goals

For example state that:

- The personal commitment of senior management to health and safety will be shown at all levels of the company.
- Managers will have responsibility for the health and safety of employees under them.
- A high level of health and safety awareness will be promoted and maintained at all levels of the company.
- All employees will take care, as far as is reasonably able, to their own health and safety and that of their colleagues and others that may be affected by what they do or fail to do.
- Everyone in the company will understand their specific roles and responsibilities for health and safety at work.

State your environment goals

State for example that:

- Health and safety practices and procedures including the work environment will be reviewed and revised regularly.
- Formal consultation and communication with employees and their representatives in all health and safety matters will occur through health and safety committees, team briefings and management involvement and commitment.
- All accidents, incidents and near misses including illnesses will be reported, investigated and corrective action taken as a priority.
- The purpose of an investigation will not be to apportion blame but to determine the underlying cause of the incident to prevent reoccurrence.
Check your understanding of evaluation

When you evaluate your systems against the goals above, you will need to check two things:

- It is a good idea to use an audit to check whether all the arrangements are in place to achieve the goals or objectives as you proposed in the policy; for example have you put in place a training programme?
- The other side of the evaluation will be for you to check whether those arrangements that are in place are working well to achieve objectives; for example check whether you are meeting training targets and employees are working effectively after receiving training.
- For your strategic goals, check each strategy to see how well it is helping you to achieve the objective of improving health and safety performance at work.

Other things to consider when preparing your policy

You are the owner of the mine or employer and so the policy shows what you want to be done to keep the mine a healthy and safe place of work. However there are some things you must consider when you prepare your policy:

- Make sure that your workers have their say by consulting them individually or through their representatives. Consulting workers and including their ideas in your policy will make it work.
- Make sure that your main effort is to protect workers from the hazards and risks of your operations.
- Make sure everyone knows you attach the greatest importance to the health and safety of the people who work for you.
- Make sure you meet MHSA requirements or what the law says you should do to provide a healthy and safe work environment.

Understanding specific policies and procedures and how to develop them?

Your specific policies and procedures are examples of administrative measures you use to control risks at the mine. Since they are low in the hierarchy of controls, you must use policies and procedures with other more effective control measures such as elimination, substitution and engineering methods, for example using damping techniques to control dust from source during drilling.

What is the difference between a policy and a procedure?

What are specific policies?

As part of your health and safety management, you can adopt a policy which states what you want to do about a specific issue at the mine, for example use of alcohol and drugs and other intoxicating substances at the mine and violence and sexual harassment. These policies support the general health and safety policy.

Your alcohol and drug use policy will state your rules about alcohol and drug use at work. For example, you will make it clear that you are banning the presence and use of alcohol and drugs at the mine and that any violations will result in dismissal. The policy will normally state: the specific objective you want to meet with the time schedule; commitment by senior management that time, money and people will be made available to put the policy into practice and make sure it is followed; an indication of consultation with the health and safety
committee when preparing and putting into practice the policy; a specification how the policy should be carried out; a statement telling everyone their role or what the policy expects them to do and making sure that they understand it, and arrangements for checking whether the policy is being followed and is working well and for reviewing it. Other examples of policies include:

- Non-smoking policy.
- Policy for the management of HIV/AIDS, TB and Silicosis.
- Policy for the selection and provision of Personal protective clothing and equipment.

**What is a procedure?**

MHSA and regulations require you to develop procedures and mandatory codes of practice for matters affecting the health and safety of employees including procedures to deal with specific activities and events such as accidents and emergencies. A procedure spells out (in a step-by-step manner), instructions showing how to deal with or handle a specific activity at work. Examples of procedures include:

<table>
<thead>
<tr>
<th>Procedure</th>
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<tbody>
<tr>
<td>Procedure for working in confined space.</td>
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<tr>
<td>Procedure for the election and appointment of health and safety representatives and committees (chapter 3 of the MHSA; chapter 6 of the MHSA Regulations).</td>
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<tr>
<td>Procedure for conducting hazard identification and risk assessment.</td>
</tr>
<tr>
<td>Risk control procedure.</td>
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<tr>
<td>Procedure for carrying out workplace inspections.</td>
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<tr>
<td>Mandatory codes of practice.</td>
</tr>
<tr>
<td>Safe work procedures including permit-to-work, isolation, and method statement of what to do at every stage of work where there is a hazard or risk).</td>
</tr>
<tr>
<td>Accident/incident, illness investigation and reporting procedure.</td>
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<tr>
<td>Purchasing procedure.</td>
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<tr>
<td>Procedure for selecting sub-contractors.</td>
</tr>
<tr>
<td>Procedures for the installation, examination, maintenance and operation of specific plant and equipment e.g. Scraper or mono winch, lifting equipment and lifting tackle, Ventilation fans, refrigeration plants.</td>
</tr>
<tr>
<td>First aid and medical emergencies.</td>
</tr>
<tr>
<td>Emergency evacuation procedure.</td>
</tr>
<tr>
<td>Procedure for occupational hygiene measurements.</td>
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<tr>
<td>Medical surveillance procedure.</td>
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<tr>
<td>Procedure for the management of change.</td>
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<tr>
<td>Procedure for the management of visitors.</td>
</tr>
<tr>
<td>Disciplinary procedures.</td>
</tr>
<tr>
<td>Procedure for issue resolution, for example, refusal to work or stopping work due to hazardous conditions.</td>
</tr>
<tr>
<td>Record keeping and document control procedure, etc.</td>
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</table>

**What do you do to establish a policy or a procedure for your mine?**

You must remember that a policy shows what you want to do about a specific issue at the mine such as HIV/AIDS while a procedure provides step-by-step instructions on how to carry out a specific activity such as the installation of a scraper winch. Briefly, you can prepare and put into practice a policy or procedure by following these steps and the best way is to have
your own people with knowledge and experience of your workplace and area concerned to do it for you and if necessary invite experts from outside:

- Identify the hazards or issues in the workplace. For example, do you want to prevent injuries from scraper winches, lifting equipment and lifting tackles (procedures) or prevent unsafe acts which can cause injuries of workers under the influence of alcohol and drugs (policy issue)?
- Collect information about the hazard or issue. If it is a hazard, you need information that will tell you why the hazard occurs, the risk and factors influencing it; refer to MHSA and regulatory requirements (see for example, MHSA Regulations 8.4-8.7; DMR Guidelines and guidance notes); Check plant and equipment manuals, manufacturer’s safety data sheets; consult employees and their representatives, they are a fertile source of information; check your accident investigation reports, Consultant reports; your own company records and practice of other companies in the mining industry; visit DMR and DOL websites and refer to authoritative publications and scientific articles on occupational health and safety relating to the issues or activity.
- Develop or draft the policy. Remember to consult your health and safety committee and tap from their vast knowledge of health and safety at your mine. Your policy or procedure can be drafted by a working group you have set up, management, health and safety representative, an experienced supervisor or health and safety officer. When the draft is completed make sure you give it to the health and safety committee to review and then test it and make corrections if necessary before you put it into practice. You can choose specific work areas where to pilot-test the procedure bearing in mind the nature of the hazard and whether employees will participate willingly.

- Put the policy or procedure into practice. Remember that procedures need to be understood by the persons who use them. This means that you must find the best way of presenting the procedure to your workers so they can understand it properly. You can explain policies and procedures during induction and refresher training. You can prepare video clips that explain your procedures. Train your employees properly on the procedures so that they understand and can follow them properly and avoid injury to themselves and others. You may need support systems to implement a policy or procedure. You may need to change work layout to install certain equipment. Any changes should be included in the procedure.
- Assess and regularly review your policies and procedures and make changes if needed. Check to see whether your policies and procedures are supporting you well in controlling hazards at work and making your workplace safe. It may be that you are spending much money but not getting the good results you aimed to achieve. This requires you to prepare a plan showing the dates you will review every procedure and policy you have adopted in your mine. Reviewing your policies and procedures will help you identify shortfalls and incidences of failure employees raised and you can make changes to improve them.

Summary elements of a health and safety policy
### GUIDELINES FOR DEVELOPING AND IMPLEMENTING A
### WORKPLACE HEALTH AND SAFETY POLICY

<table>
<thead>
<tr>
<th>Policy element</th>
<th>Description of the element</th>
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| **A** Statement of intent | • Vision or direction for health and safety  
• Senior management commitment  
• Health and safety goals and objectives  
• Responsibility and accountability for implementing objectives  
• Worker participation in health and safety |
| **B** Principles included in statement | Examples:  
• Health and safety at work is everyone’s responsibility  
• Compliance with MHSA and other relevant legislation and regulations  
• Health and safety is a priority equal in importance with production and quality control  
• The obligation to identify and remove or control all hazards at work  
• Involving employees or their representatives in health and safety matters |
| **C** Requirements to implement or make the policy work | Examples:  
• Written in clear and easy to understand language  
• Authorization of the Policy by the General Manager and Employees’ representative  
• Communicating the Policy to all employees and interested parties  
• Include a statement that the Policy will be reviewed at regular intervals e.g. every year |

The following sample of policies and procedures are provided as appendices in this guideline:

- Sample General OHS Policy: Appendix A
- Sample specific policy: Appendix B
- Sample procedure: Appendix C

*Courtesy: MHSC*