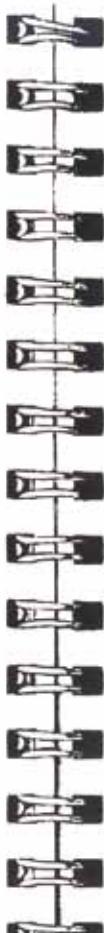


A GUIDE ON EMPLOYER'S SAFETY POLICY



Occupational Safety and Health Branch
Labour Department



OCCUPATIONAL SAFETY & HEALTH COUNCIL

This guide is prepared by
the Occupational Safety and Health Branch
Labour Department

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This guide is issued free of charge and can be obtained from offices of the Occupational Safety and Health Branch of the Labour Department. It can also be downloaded from the Labour Department's website at <http://www.labour.gov.hk/eng/public/os/D/SafetyPolicy.pdf>. For enquiries about addresses and telephone numbers of the offices, please refer to Labour Department's website at <http://www.labour.gov.hk/eng/tele/osh.htm>, or call 2559 2297.

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CONTENTS

	<i>Page</i>
1. Introduction	3
2. General features	4
3. Statement of employer's general policy	5
4. Organisation for carrying out the policy	6
5. Arrangement for carrying out the policy	7
6. Hints on drafting of safety policy	8
Enquiries	10
Complaints	10

1. Introduction

Most occupational accidents can be prevented if proper thought is given to the risks involved in the work and the relevant precautions are taken. The major purpose of employer's safety policy is to achieve this goal. It indicates how seriously management take their responsibilities on safety and health at work. It contributes to the identification of risks and precautions. Individual responsibilities are spelt out for ensuring that the precautions are properly carried out.

It is hoped that this guide will prove helpful to those who may wish to prepare or revise their company's safety policy.

2. General features

A written safety policy covers three aspects:

- (a) The statement of the employer's general policy with regard to safety and health of his employees;
- (b) the organisation for carrying out the policy;
- (c) the arrangements for carrying out the policy.

It should be the duty of every employer to prepare a written statement of his general policy with respect to the safety and health at work of his employees and the organization and arrangements for carrying out that policy, and to bring the statement and any revision of it to the notice of all his employees.

It will be sensible for an employer to consult his employees and to heed to the advice of the safety committees in order to ensure that the best organization and arrangements for safety and health are evolved and maintained.

In many cases, new risks are being introduced into the workplace due to changes in techniques, introduction of new plant and equipment, use of new materials or taking on of new types of contract. It is at this stage that new precautions need to be learned and adopted. A revision of the safety policy to include new information is necessary.

Every employer has to ensure that the written safety policy should be kept up-to-date. Where, for instance, those persons responsible for the various aspects of safety and health are replaced, amendments must be published without delay and brought to the notice of all employees. Wherever any improvement or change affects the policy of an employer, they should be reflected in its periodic revision.

What employer does is far more important than what the safety policy says. It must be emphasized that the written word does not prevent accidents. It is the implementation and application of the policy that prevents accidents.

3. Statement of employer's general policy

This is the employer's overall objectives for safety and health at work. It should contain:

- (a) a clear declaration of the employer's intention to provide safe and healthy working conditions for his employees and to ensure that work done by his employees does not adversely affect the safety and health of anyone.
- (b) reference to the facilities available for employer and employees for obtaining consultations on safety and health matters.
- (c) reference to the policy on obtaining expert advice necessary to determine the risks to safety and health at work and the relevant precautions.
- (d) a commitment to the provision of relevant information and necessary training to be given to employees in respect of risks to their safety and health which may arise out of their work.
- (e) reference to the necessity of the support by all persons in the company in order to achieve the objectives of the safety policy.

4. Organisation for carrying out the policy

This refers to the allocation of responsibilities to people in ensuring that work is done safely and without risks to health. The following points should be considered:

- (a) a clear and logical allocation of duties and responsibilities for safety and health with each member of the company involved knowing who and what he is responsible for and to whom he is responsible.
- (b) the final responsibility should be placed on the senior member of management. The document should be signed and dated by this person as should each subsequent revision.
- (c) responsibilities clearly identified for:
 - (i) training.
 - (ii) monitoring compliance with the policy.
 - (iii) maintaining contact with sources of advice such as safety adviser, employer's federations, trade associations, manufacturers and Occupational Safety and Health Branch of the Labour Department.
 - (iv) responding to employee initiatives.

5. Arrangements for carrying out the policy

These deal mainly with how those responsibilities are carried out. The statement of arrangements should refer to :

- (a) the procedures for dealing with identified risks including protection of machinery, effective inspection and maintenance of plant and equipment, fire prevention and good housekeeping.
- (b) the identification of precautions and procedures for dealing with any special risks relating to particular types of processes and work activities.
- (c) safe systems and methods of work including maintenance activities and cleaning machinery and plant.
- (d) accident reporting and investigation procedures including arrangements for looking at and analysing accident statistics and near misses.
- (e) provision and use of protective clothing and equipment.
- (f) procedures for introducing new machinery, substances or processes.
- (g) emergency procedures where relevant as in the event of fire or explosion. This is particularly relevant when work is carried out on other premises where procedures for cooperation with the management of the premises will need to be understood.
- (h) arrangements for obtaining and communicating to employees information about safety and health matters, including information about substances for use at work, especially on their first introduction or when persons work with them for the first time.
- (i) arrangements for consultation with employees and involvement with safety committees.
- (j) arrangements for identifying training needs and procedures for securing adequate training.
- (k) arrangements for safety and health inspections, audits or other systems for checking the effectiveness of the arrangements for safety and health.

6. Hints on drafting of safety policy

Safety policy should be drafted clearly so that all levels of management and employees understand it and know what their responsibilities are.

The length and content of each written safety policy must be specifically prepared to meet the situation of the particular employer. He must thoroughly assess the possible hazards to safety and health of his employees which might arise in connection with the activities on which they are employed and in the premises or other working area in which they are required to work.

No one policy is necessarily suitable for any two companies so that each company must write its own policy according to its own needs. To provide a model safety policy might cause some employers to overlook important safety and health measures which their particular activities and premises demanded.

All written safety policy should cover all the essential features of the general policy statement, the organization and arrangements for carrying it out.

In some larger or more complex companies, it may also be better to produce the safety policy in the form of two documents:

- (a) a concise statement of the general policy, organization and arrangements in a single document which could be distributed to all employees and which would make reference to;
- (b) a more detailed document (e.g. including manuals of rules and procedures) which could be held in a central position in each location for all to see on request, or posted where it could be seen by all employees.

In the case of employers engaged in a number of different activities or where the operations are geographically widespread, the policy may require formulation at more than one level. The highest management level should lay down in writing the principles of the policy whilst the sub-groups or operational units interpret that policy in a realistic written form to suit the identified needs at the lower levels.

Whilst the overall policy responsibility for safety and health rests at the highest management level, all individuals at every level will have to accept degrees of responsibility for carrying out that policy. Wherever

appropriate key individuals or their appointments should be named and their responsibilities defined. In addition, there should be adequate arrangements to cover the absence of personnel with key safety functions.

Where functional expertise exists to advise line management, then the relationship of these functions, e.g. safety adviser, chemist, etc. should be made clear and the extent of their functions defined in relation to safety and health.

The policy statement should make it clear that the final level of responsibility is that of each and every individual employee.

The written statement should ensure that all who are at risk are well aware of the hazards, the reasons for control in working practices and the part that they as individuals have to play in maintaining a safe and healthy working environment. Many accidents occur because employees do not understand the hazards involved and the precautions that have to be taken. The main hazards should be identified and reference made in the statement to additional rules and regulations which must be observed.

Procedure should be laid down for accidents, particularly those involving any personal injury, to be systematically recorded by the employer. Such records should be regularly present to all management levels and his safety committee with a view to identifying new hazards and checking on the frequency of occurrence of known hazards.

No matter how adequate are these written statements their aims will not be achieved without good training and thorough supervision. Employers' safety policy should reflect their determination in these areas. It is, for instance, vital to spell out the supervisor's key role as he is the person on the spot who knows how the job is done. It is equally important for management to consider, and then set down, the positive steps which are to be taken to train and equip supervisors for this responsibility.

Enquiries

If you wish to enquire about this guide or require advice on occupational safety and health, you can contact the Occupational Safety and Health Branch of the Labour Department through:

Telephone : 2559 2297 (auto-recording after office hours)

Fax : 2915 1410

E-mail : enquiry@labour.gov.hk

Information on the services offered by the Labour Department and on major labour legislation can also be found by visiting our Homepage on the Internet at <http://www.labour.gov.hk>.

Information on the services offered by the Occupational Safety and Health Council can be obtained through hotline 2739 9000.

Complaints

If you have any complaints about unsafe workplaces and practices, please call the Labour Department's occupational safety and health complaint hotline at 2542 2172. All complaints will be treated in the strictest confidence.

