



SIMS
METAL
MANAGEMENT

SimsMMway Safety

Europe and Sims Recycling Solutions Global



SimsMMway Safety

This booklet is the core document in the SimsMMway Safety Management system and provides the basis for Safety Leadership within Sims Metal Management Europe and Sims Recycling Solutions globally (“The Business”).

It describes:

- The SimsMMway Safety Vision, Belief and Goal
- The SimsMMway Safety Principles and Policy
- The SimsMMway Strategic Safety Framework
- The 12 SimsMMway Safety Management Standards; and
- The 14 SimsMMway Safety Golden Rules

It is supported by:

- Detailed documentation on the 12 Safety Management Standards
- Your region's Strategic Safety Plan cascaded into site specific and personal safety plans.
- Your Regional Safety Implementation Committee (RIC's)
- Observational Behavior Audits, Hazard Identification and the KMI system
- Job Cycle Checks
- Safe Work Procedures,
- Regular Safety Audits; and
- Safety induction, ongoing training and education

Sims Metal Management is committed to a “Zero Harm Workplace” and working safely is a non-negotiable condition of your employment.

- If you observe any unsafe act or condition, you must challenge it constructively, find a safe solution and report it promptly.
- If you have any safety concerns about the task you are about to perform, do not commence it and seek help.
- If you need any help or clarification relating to safety, contact your Supervisor or Line Manager for assistance.

The SimsMMway Core Safety

Vision is: To achieve a Zero Harm Workplace through the effective management of safety and occupational health in all business units.

Belief is: That all employees, contractors and visitors must feel safe and be able to finish their daily activities without injury.

Goal is: To shape employee behavior to recognize risk and prevent harm to self and others, supported by a strong risk based safety management system and the provision of safe operating assets and infrastructure.

The SimsMMway Core Safety Vision, Belief and Goal are supported by the following;

Safety Principles:

- Working safely is a condition of employment.
- Safety is a Line Management accountability. Alongside this, all employees and contractors are directly responsible for preventing injuries and illnesses.
- Management at our business units is responsible and accountable for the complete implementation of SimsMMway Safety. We expect Line & Frontline Management to provide leadership in safety.
- The region will allocate appropriate resources, training, education, consultation and auditing to ensure the requirements of the SimsMMway Safety Management Standards are translated into site specific, compliant and effective Safe Working Standards.
- We will provide safe plant and equipment that will be designed, procured, used and maintained to a standard that minimizes risks of injury in its application.
- We will set appropriate objectives and monitor performance to ensure continuous improvement towards our vision of a zero harm workplace.
- Non Negotiable Safety and Management Standards, and Safe Working Rules and Standards, will be applied by the SRS Global and Metals Europe Region.
- Management audits are a non-negotiable requirement.

These Core Safety Values and Principles provide the foundations of the expected culture, behavior and performance standards for The Business as articulated in our Safety Policy.

The SimsMMway Safety Policy

Commitment: We are committed to the safety of every individual and to providing a safe and healthy work environment for all of our employees, suppliers, contractors and visitors.

We recognize that the safety of our employees, suppliers, contractors and visitors comes before all other considerations and aim for a “zero harm” workplace. As a minimum, we will comply with all applicable occupational safety and health laws, regulations and standards in all of the jurisdictions in which we operate, but will strive to achieve levels of performance which exceed basic compliance.

Policy: All injuries, illnesses and operational exposures associated with the workplace are preventable and can be safeguarded against. We will maintain sound general working conditions at all times through the provision of adequate, healthy and safe Facilities and will provide appropriate support, including the use of external consultants as required, to ensure that the best safety and health practices exist in all our operations.

Facility Managers must:

- Maintain healthy and safe working conditions.

Line Managers and Supervisors must:

- Ensure that a safe system of work exists and that risk assessments are implemented as required, when equipment is purchased or when jobs or processes significantly change;
- Ensure that employees and contractors are trained and supported in the safe performance of their assigned tasks.
- Ensure that all unsafe acts, conditions or safety incidents, including near misses are reported and investigated promptly to determine root cause, correct deficiencies and share lessons across The Business as appropriate to shape a NO REPEAT culture.

Employees must:

- Refuse to perform any task that cannot be performed safely;
- Understand and comply with the letter and spirit of all safety and health practices and procedures;
- Promptly report any observed unsafe act or condition, safety incident or breach of policies and procedures to his/her Supervisor;
- Support continuous improvement relating to safety and health; and
- Be accountable for his/her safe conduct at all times with regard to themselves, fellow employees and members of the community.

In the unfortunate event of a workplace incident, we will actively engage in the rehabilitation, injury management, support and return to work of injured employees.

We will seek continuous improvement in all safety and health aspects of our operations and will seek to eliminate the risk of injury through the integration of safety and health evaluations for all operational activities, supported by appropriate risk management principles and tools.

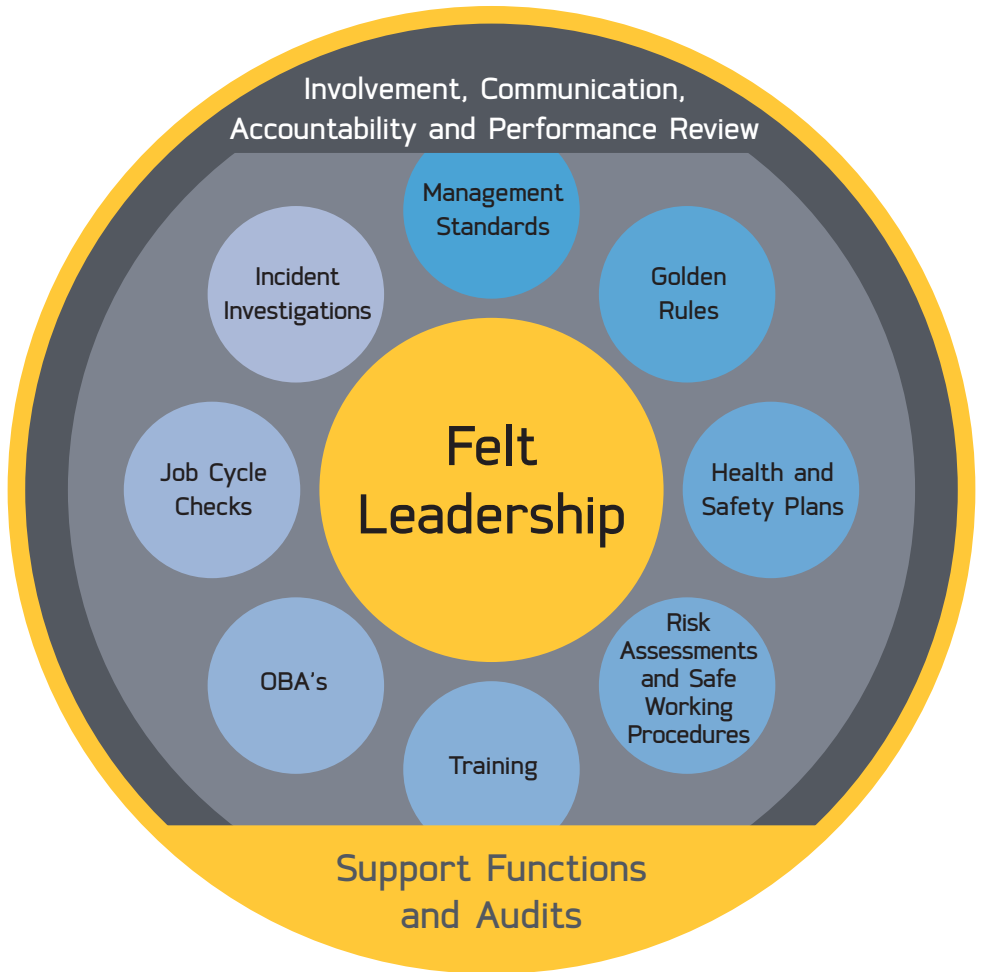
Risk assessments and audits will be carried out as required and will be an integral consideration when new businesses and plants are purchased or when the positions of relevant employees change.

Our managers will regularly consult with employees, safety officers and elected safety representatives on safety and health matters.

Support: We are committed to supporting all of the above through effective leadership, procedures, management systems, training and accountability at all levels and making employees and contractors aware of this policy, its impact on them and on the reputation of our business.

This Safety Policy is implemented through the SimsMMway Strategic Framework for Management of Safety and the SimsMMway 12 Essential Safety Management Standards.

The SimsMMway Strategic Framework



The SimsMMway 12 Essential Safety Management Standards

- 1 Policy, Leadership, Accountability and Commitment
- 2 Risk and Change Management
- 3 Legal and Other Requirements
- 4 Objectives, Targets and Performance Management
- 5 Training, Awareness and Competence
- 6 Communication, Consultation and Commitment
- 7 Documentation and Control of Documents
- 8 Performance Standards and Operational Control
- 9 Emergency Preparation and Response
- 10 Contractor Safety Management
- 11 Injury and Incident Reporting and Investigation
- 12 Audits, Monitoring and Review



All injuries, illnesses and operational exposures associated with the workplace are preventable and can be safeguarded against.

The SimsMMway Safety Policy

Their purpose is to:

- Support the realization of the Core SimsMMway Safety Vision, Safety Principles and Safety Policy.
- Support the SimsMMway Safety Framework.
- Describe and document the foundations for the development and implementation of suitable safety management systems and site specific Safe Working Standards.
- Provide the basis for assessing the ongoing adequacy of existing safety systems and standards aimed at continuous improvement in our safety performance.

Together they form the basis for the development, enhancement and application of integrated safety management systems throughout The Business and its operations, including comprehensive sets of more specific Safety Working Standards, policies, rules, procedures and practices with local applicability.

The SimsMMway 12 Essential Safety Management Standards are:

- Endorsed by the CEO Europe and Global SRS.
- Compulsory and apply to all of The Business.
- Apply to all mergers and new acquisitions to identify safety risks, develop gap analysis and implement appropriate integration measures, so as to develop a cohesive safety culture.

It is the attitude of people
that is the ultimate determinant
of whether we act safely or not . . .
and ultimately whether we return
home or not



Graham Davy

Graham Davy
CEO Europe & Global SRS

Safety Management Standard 1

POLICY, LEADERSHIP, ACCOUNTABILITY AND COMMITMENT

Management shall demonstrate that safety is as important as all other key business drivers such as cost, production, quality and employee relations. Top and Senior Line Management must lead by example, adopt a Zero Harm Workplace attitude and display the required visible felt leadership behaviors that will drive continuous improvement in safety performance. Management must set high, non-negotiable standards actively engage with the workforce and challenge unsafe behavior or conditions. Top management establishes the policy which defines the principles that are to govern all decisions regarding safety.

Requirements

1. The Business shall maintain a safety policy appropriate to the nature and scale of its activities. The CEO will review it regularly to ensure it remains relevant.
2. Regional Directors shall be accountable for developing, producing and maintaining a local, more specific safety policy and safety management system that reflects the Region's Vision, Principles and Safety Management Standards.
3. Each of the Region's business organizations shall have clearly defined roles, responsibilities and accountabilities at all levels and functions to ensure the effective implementation of the safety management system. These shall be defined, documented and communicated to all appropriate personnel.
4. Line Management shall be accountable, and be held accountable, for ensuring the effective implementation of SimsMMway Safety within their sphere of influence. In keeping with the Vision of "Towards a Zero Harm Workplace" they shall have a clear responsibility to set priorities for safety and to ensure processes are in place to deliver continuous improvement.
5. Safety Professionals (alternatively termed Safety Managers or Advisors) shall support the safety leadership of the Line Management organization in the role of internal consultant and expert-resource/influencer/advisor.
6. Adequate resources shall be made available to ensure the effective implementation and maintenance of the safety management system, including the use of appropriate professional advice.

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7. Regional Directors, Line Management, employees and contractors shall demonstrate a clear understanding of the need to comply with Safety Management and Safe Working Standards and of the consequences of non compliance. This includes their commitment to a zero harm workplace and the Region's Safety.
 8. Regional Directors and Line Management (including Frontline Supervisors) shall visibly demonstrate their commitment to safety by participating in Safety programs, audits and reviews to ensure that the Safety Management Standards and Safety Working Standards are entrenched in workforce behavior. This includes engaging with employees and contractors, leading by example, using observation behavior auditing techniques and displaying visible felt leadership.
 9. Regional Directors and Line Management shall adopt formal processes that reinforce, recognize and support desired safety outcomes.
 10. Regional Directors, Line Management, employees and contractors shall refuse to allow work to be undertaken or to continue where due consideration has shown a conflict to exist between safety and other business needs.
 11. Each Regional business shall formalise the need to periodically review the safety policy and associated systems to ensure they remain relevant and appropriate to the level of safety risk.



Safety Management Standard 2

RISK AND CHANGE MANAGEMENT

All workplace hazards must be identified, risk assessed and thereafter managed safely on an ongoing basis. The aim is to continuously strive to minimize - to reasonably practicable levels - the potential for incident/injury occurrence by creating/identifying, and implementing, 'best risk prevention practice'. Importantly, the risk management process must also be applied to changes to operations, processes, and personnel, routine AND particularly non-routine operations.

Requirements

1. The Business shall establish and maintain formal systems and processes for the ongoing identification of safety hazards related to workplace activity and assessment of risks, through consultation with competent personnel.
2. Risk assessments shall be undertaken, reviewed and authorized by competent persons prior to work activities commencing.
3. The risk assessment shall apply to the full cycle of the activity, including pre-thought, preparation and planning prior to the activity taking place. It shall apply to routine and non-routine activities, products, procedures and services, planned or unplanned changes, all personnel, contractors, suppliers and visitors, operating procedures, all equipment and Facilities.
4. All non-routine operations with guards and safety devices removed for testing or adjusting must be approved by responsible supervision, and if necessary by higher level management, through the non-routine risk assessment/authorization to work process.
5. The risk assessment process shall be appropriate to the nature and scale of the risks and undertaken by competent personnel, including personnel likely to procure, operate and/or maintain plant and equipment.
6. The Business shall implement relevant control measures to ensure that safety risks are managed through the effective use of the hierarchy of risk controls. These shall be reviewed periodically.
7. The risk management process must be documented.
8. The Business must communicate the results of the risk management process to all relevant personnel and take into account training, awareness and skills competency requirements.

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9. The Business shall ensure a Change Management program is developed, implemented and maintained by competent personnel to manage risks whenever a planned, unplanned, permanent or temporary change occurs.
 10. The Change Management program shall be appropriate to the nature and extent of the associated risks and should consider changes in duration, personnel, organization, activities, processes, Facilities, equipment, procedures, law, standards, materials, products, systems and services.
 11. Management must ensure competent personnel are involved in any Change Management Program and that consequences of any changes are communicated and understood by all relevant personnel.



All workplace hazards must be identified, risk assessed and thereafter managed safely on an ongoing basis.

Safety Management Standard 3

LEGAL AND OTHER REQUIREMENTS

The Business shall ensure that applicable legal, regulatory and other safety requirements are identified, documented, maintained, accessible, communicated, understood and practised.

Requirements

1. Each geographical business will have systems in place to identify current relevant legal, regulatory and other safety related requirements.
2. Each geographical business shall have or have access to competent people for the interpretation and application of all legal, regulatory and other safety related requirements
3. Each geographical business shall have formal systems in place to ensure that relevant information is effectively and timely communicated and understood by all appropriate personnel.
4. Each geographical business will have in place appropriate documentation and information control for legal, regulatory and other safety related requirements.
5. Where local legal and regulatory requirements do not require an appropriate level of performance, all activities shall be conducted in compliance with SimsMMway Safety.



Front and Line Managers will develop a personal safety plan incorporating three to four personal safety goals.

Safety Management Standard 4

OBJECTIVES, TARGETS AND PERFORMANCE MANAGEMENT

By setting objectives and targets The Business is stimulated to develop and manage safety activities into a coherent program that motivate performance, plan and direct continuous improvement and evaluate progress.

Requirements

1. Starting from the leadership of The Business, and cascading down through the individual businesses and sites, formal, measurable and meaningful safety performance objectives and targets shall be established at all levels and functions. These shall be consistent with the vision of “Towards a Zero Harm Workplace” and the SimsMMway Strategic Framework for Safety Management. Effective use shall be made of both leading and lagging indicators in a continually improving process, with the focus being on preventing incidents before occurrence.
2. Objectives and targets shall as a minimum reflect applicable legal, regulatory and other requirements and be consistent with the nature of the hazards and risk associated with the operations.
3. The Business shall have formal systems in place to ensure that objectives and targets are assigned, communicated and understood by all appropriate personnel, from senior management through the line to staff and contractors.
4. The Business shall ensure that adequate resources are provided to ensure the objectives and targets are met.
5. The Business shall ensure that all relevant personnel and contractors understand the objectives and targets and ensure that safety obligations are incorporated into their new agreements.
6. The Business shall ensure that there are formal processes in place to allow effective two-way communication and consultation on establishing safety objectives and targets.
7. The Business shall ensure that there are formal responsibilities and processes in place to monitor progress towards meeting the safety objectives and targets.
8. Safety shall be a priority for management and safety objectives and targets shall be factored into their performance contracts expectations.
9. The Business shall ensure that processes exist to effectively review the objectives and targets on periodic basis to ensure their continued relevance in the context of ongoing risks.

10. The Business's regions shall develop formal Regional Safety Improvement plans that will incorporate information resulting from the audit program, incidents, accidents and other relevant information as identified above. Each Facility will, in turn develop an annual site specific improvement plan that will incorporate information on the how the region's safety plan will be implemented at the Facility, along with focused improvements in the areas of leading and lagging indicators. Finally, Front and Line Managers will develop a personal safety plan incorporating three to four personal safety goals.



Safety Management Standard 5

TRAINING, AWARENESS AND COMPETENCE

Safety training is important for all employees and contractors and is an important tool to encourage and reinforce a positive attitude towards safety. All employees and contractors shall be competent to perform their activities safely.

Requirements

1. The Business shall have formal systems in place to ensure that all employees and contractors are competent to perform their activities safely when employed within the Region's businesses or when they are acting on behalf of the Region.
2. Regional Directors are responsible and accountable for the development and implementation of training, awareness and competence programs within their operations.
3. The Business shall ensure that management and all relevant personnel receive regular training and coaching in hazard identification, risk management and control of hazards in their areas of responsibility. Line Management is accountable for the development, implementation and monitoring of the effectiveness of this training.
4. The Business shall ensure that all roles, positions and functions have the required safety competencies defined in terms of education, training and experience.
5. General and specific training needs, including refresher training shall be identified, prioritized and delivered to ensure that relevant employees and contractors are competent before commencing activities.
6. Training records for employees and contractors shall be documented, maintained and readily accessible.
7. Training should consider changes to operations and personnel that may have an impact on safety. Return from leave or absence or role changes should be considered.
8. Training programs shall take account of the results of risk assessment or change management programs.
9. The Business shall ensure that HR selection policies incorporate safety training, awareness and competencies of all relevant personnel prior to workplace deployment.

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10. The Business shall ensure that management are trained in effective visible felt leadership techniques that reinforce desired behaviors and correct 'at risk' workplace behavior.
 11. The Business shall ensure that training programs consider the cultural and educational diversity of the workplace. Where appropriate, programs should be adapted and reviewed for effectiveness.
 12. The Business shall ensure that induction programs for personnel, contractors and visitors includes aspects relating to safety hazards, risks and control measures.
 13. The Business shall ensure that processes are in place to periodically review systems and processes to ensure they remain relevant and appropriate to the nature and extent of the associated risks, This shall be achieved through the Job Cycle Check process. Job Cycle Checks shall be performed on all activities to ensure our rules and procedures are written accurately, clearly, concisely, with no ambiguity and captures every worker and every activity, ensuring that there is no confusion, misinterpretation or misunderstanding of safe systems of work by all site operators.



Job Cycle Checks shall be performed on all activities to ensure our rules and procedures are written accurately.

Safety Management Standard 6

COMMUNICATION, CONSULTATION AND COMMITMENT

The Business shall provide a framework for effective two way communication, consultation and commitment between management and employees. The goal is a motivated organization where management is providing effective safety leadership and every employee is committed to good safety performance.

Requirements

1. The Business shall develop and implement formal processes (such as SimsMMway Safety Steering Group, Region Implementation Committees (RIC's) Site Safety Committees, Area/Team Safety Meetings, Toolbox Talks, etc) to ensure effective consultation, commitment and communication of safety related matters at all levels of the organization operations. Line Management must apply visible, demonstrated felt leadership to these processes. The Site Manager shall lead and chair the Site Safety Committee and the Site or Regional Safety Advisor shall be required to assume the role of 'internal consultant' and key influencer and professional resource to the Committee. These processes shall be interactive, allowing for a two way dialogue and shall involve all appropriate personnel, contractors, suppliers and communication of all safety matters to visitors.
2. The Business shall establish and maintain effective and appropriate discussion forums for the regular consultation and communication of safety matters. These forums shall involve all relevant personnel and shall be used to track, monitor and report on the effectiveness of current safety systems and performance.
3. The arrangements for employees safety representation (e.g. on safety committees) shall be formally defined and communicated.
4. The Business shall ensure that the consultation, commitment and communication programs consider the cultural and educational diversity of the workforce and where appropriate the programs shall be adapted to account for these differences and reviewed for effectiveness.
5. The Business shall communicate the Vision, Principles, Policy, Safety Management Standards, Safe Working Standards and Golden Rules to its employees and contractors.

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6. Regional Directors and Line Management shall motivate employees through positive encouragement (e.g. use of behavior and auditing techniques) and through use of inventive communication techniques (e.g. monthly themes, poster campaigns, safety boards). Line Management shall adopt a consistent approach to any disciplinary action taken (e.g. breaking a Golden Rule).
 7. The Business shall develop and implement formal processes to allow for the sharing of lessons learned, good practices and opportunities for improvement, including the sharing of information with other sites, geographical businesses and the wider SMM Group.
 8. The business shall ensure that processes are in place to ensure a periodic review of the effectiveness of the communication, consultation and commitment processes to ensure they remain relevant and appropriate to the nature of the risks.



With safety alerts, reporting and training, we are taking as many preventative actions as possible.

Erik Americano, Fork Lift Operator, Rancho Dominguez, CA

Safety Management Standard 7

DOCUMENTATION AND CONTROL OF DOCUMENTS

All information required to control risks shall be identifiable, readily available and, where appropriate, controlled.

Requirements

1. The Business shall implement and maintain a system for the control of documentation and data necessary for the effective management of risk and monitoring of progress against safety objectives, including safety plans.
2. The system shall ensure that safety records be identified, securely stored, readily located and retrievable, accurate and legible.
3. The system shall ensure that all confidential records, including medical, personnel, legal and other, are controlled and maintained securely.
4. The system shall ensure that obsolete documents and data are removed promptly or otherwise identified and protected from unintended use.
5. The system shall ensure that a register of archived documents and data, retained for legal purposes or the preservation of knowledge, is kept and maintained.



All information required to control risks shall be identifiable, readily available and, where appropriate, controlled.

Safety Management Standard 8

PERFORMANCE STANDARDS AND OPERATIONAL CONTROL

Standards of performance include rules, procedures and working practices. The development and implementation of 'local' and/or site specific Safe Working Standards shall ensure that standards are written, reasonable, known, understood, followed and enforced by Line Management.

Requirements

1. The Business shall develop and implement a comprehensive set of local and/or site specific Safe Working Standards that shall include best practice, formal control measures for all processes and activities based upon the results of risk assessments. It is essential that these include, as a minimum, identified safety-critical and high hazard aspects of business operations (e.g. control of the vehicle/pedestrian interface, isolation of equipment (LOTO), working at height, general and specific Permit to Work (PTW) systems, etc).
2. Formal control measures for all relevant processes, products, services and activities including maintenance, shall be established, implemented and maintained by relevant competent personnel and approved by senior Line Management.
3. Control measures shall be based upon the risk assessments and shall be consistent with the nature and extent of the associated risks. Where relevant, this shall include reference to design data and operating limits. The control measures shall include documented systems and procedures where relevant, and shall be implemented following the principles of the hierarchy of control.
4. Relevant control measures including procedures and other documented requirements shall be clearly communicated to all relevant employees, contractors and suppliers.
5. Systems, procedures and work practices shall be formally reviewed on a periodic basis and following an event or incident to ensure that they continue to be applicable, relevant and effective in controlling the risks for which they were developed. The results of these reviews shall be used for continuous improvement and discussed with all relevant employees.
6. The Business shall ensure appropriate systems are in place for the effective training of all relevant employees in the identified operational controls.

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7. The Business shall ensure that formal maintenance and inspection programs are established, implemented and maintained to ensure that on-going integrity of the Facility, plant and equipment and any safety critical devices. The programs shall include inspection, testing, calibration and certification at intervals determined by the level and nature of the risk, any historical evidence of safety issues and manufacturers' requirements as well as being an integral part of maintenance programs.
 8. Systems shall be in place to test and maintain the availability and effectiveness of protective systems and devices.
 9. Facility design, construction and maintenance activities shall take into account sound engineering practices consistent with best practice national or international codes and standards.
 10. The Business shall ensure that programs are in place to ensure that personnel in critical jobs are fit for duty and not compromised by external influences, including alcohol and drug abuse.
 11. The Business shall ensure that procedures are in place to periodically review operational control systems and processes to ensure that they remain relevant and appropriate to the nature and extent of the associated risks.

These days safety feels spot on - it is simply a case of being aware of the correct procedures and following them to the letter.

Phyllis Weems, Process Operative, Dumfries, Scotland.

Safety Management Standard 9

EMERGENCY PREPARATION AND RESPONSE

The business shall identify, be prepared for, and have the capability to react appropriately to emergency situations

Requirements

1. The Business shall identify, assess and document all potential emergency situations and their impacts, including neighbors and potential external emergency situations.
2. Assessments shall be undertaken by competent personnel using appropriate methodologies.
3. The Business shall develop and implement plans to respond to the identified emergency situation, including measures for the prevention and limitation of illness and injuries arising.
4. The Business shall ensure that, when developing these plans, they consider the nature and scale of the operation, the results of risk assessments and control measures, worst case scenarios, the availability and capability of local emergency services, details of any emergency response or consultation agreements, legal and other requirements, historical experiences, best practice and findings from emergency drills.
5. The Business shall identify the appropriate resources (on and off site) to ensure the effective implementation of the emergency situation arrangements including appropriate personnel, contractors, emergency services, equipment and warning devices.
6. The Business shall clearly define, document and communicate all roles and responsibilities associated with the implementation and execution of the emergency situation arrangements. This includes all appropriate internal employees, legal advisors, contractors, emergency services and where relevant, external regulators.
7. The Business shall ensure that all relevant employees, contractors and visitors are trained, competent and familiar with the requirements of the emergency situation arrangements.
8. Emergency response drills shall be conducted to determine the effectiveness of the emergency situation arrangements. Improvements shall be incorporated into revisions of the arrangements.

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9. The emergency response drill shall include desk based exercises and full evacuation. The type and frequency of the drills shall be determined on the basis of the nature and scale of operations and the extent of the risks at those operations.
 10. All business units shall periodically formally review, document and amend the emergency situation and following any emergency situation to ensure that they remain relevant and appropriate to the nature and extent of associated risks.



Safety Management Standard 10

CONTRACTOR SAFETY MANAGEMENT

All Contractors shall undertake their activities in accordance with legal, regulatory and other safety requirements including the elements of the SimsMMway Safety Framework.

Requirements

1. The scope and application of the contractor arrangements include temporary activities, discrete projects and short/medium/long term services within operations.
2. The Business shall develop and implement a formal contractor management system (CMS) appropriate to the nature and extent of the associated risks, such that all contractors undertake their activities in line with SimsMMway Safety. The CMS shall comprehensively encompass the following 6-step process:
 - a. Contractor Selection
 - b. Contract Preparation
 - c. Contract Award
 - d. Contractor Preparation/Training/Induction/Mobilization
 - e. Monitoring/Control of Contractor Work
 - f. Post-Contract Evaluation
3. The CMS shall include the requirement for the contractor to be evaluated on a risk basis before contractual arrangements are established. This shall consider the nature of their products, activities or services and previous safety performance, training, awareness and competence. The selection of a contractor shall not be based solely on financial criteria. Where reasonable evidence of prior unsafe behavior or doubt as to safety awareness exists, the contractor must present reasonable documentation as to his or her capacity for safe behavior.
4. The CMS shall include the requirement for formal safety expectations and arrangements to be built in to the contract to ensure the contractor complies with SimsMMway Safety.

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5. Contractors shall be required to undertake risk assessments for all activities and develop safety plans as part of the contract conditions and prior to commencing any activities. All work to be performed by Contractors shall be controlled with application of formal Permit to Work systems (with the exception of work performed by Contractors supplying routine, daily, routine, unskilled services and support – this shall be controlled by appropriate supervision, training and application of formal safe working procedures).
 6. The CMS shall contain clear and documented reporting relationships, lines of consultation and communication, roles, responsibilities and accountabilities and (where relevant) system interfaces between the contractor and the operation.
 7. The Business shall appoint specific representatives to act as a focal point for the management and oversight of the contractor. These representatives shall ensure that competent persons undertake periodic safety reviews or audits of contractor safety performance in accordance with the CMS.
 8. All contractors shall report regularly on their safety performance to the appointed representatives, and where relevant shall be included on site meetings, reviews and incident investigations.
 9. The CMS shall include arrangements for the evaluation and risk assessment of equipment and materials prior to purchase, hire or lease, to ensure their suitability for use and to prevent the introduction of safety hazards and risks. Their evaluation and risk assessment shall be performed by suitable and competent persons.
 10. All contractors shall provide information on the hazards and risks associated with their equipment, products and services prior to delivery or commencement of work and whenever changes occur.
 11. The Business shall have a register of all contractors working on site. This register shall include documented information on their safety performance. Contracts shall include a right to terminate for poor safety performance.
 12. The CMS shall ensure that management of contracting companies regularly audit and review their operations on site for compliance to their own standards and the elements of the SimsMMway Safety Framework.
 13. The Business shall ensure that processes are in place to periodically and effectively review the CMS to ensure that it remains relevant and appropriate to the nature and extent of the associated risk.

Safety Management Standard 11

INJURY AND INCIDENT REPORTING AND INVESTIGATION

All injuries and serious incidents including near misses shall be promptly reported and investigated to determine their root cause. Appropriate corrective action shall immediately be taken to eliminate a recurrence, and the lessons shared across the Region (in alignment with the desired No Repeat culture). The global KMI system is to be used for this purpose.

Requirements

1. The Business has a formal system in place, which must be used for the reporting, investigation, closure and communication of all near misses, including unsafe acts and conditions, injuries and other incidents. All Incidents including reportable injuries and near misses must be entered into the KMI Incident Reporting Module.
2. The methodology, responsibility and authority for the general handling and investigation of all near misses, injuries and other incidents, with the objective of establishing the fundamental root causes, must be clearly defined and articulated.
3. Mechanisms and reporting must ensure that legal defences are not compromised during the initial and subsequent internal and external investigation process.
4. Incident Reporting and investigations shall ensure that comprehensive and documented investigations are performed that identify and prioritize corrective and preventative actions to eliminate or reduce the risk and recurrence of near misses, injuries and incidents. This shall specifically include the root cause analysis.
5. The proposed corrective and preventative action shall be reviewed through the risk assessment process prior to implementation to ensure these are appropriate to the nature and extent of the hazards and associated risks.
6. Safety systems and procedures shall ensure that corrective and preventative actions, including changes in procedures, processes or existing systems are documented, communicated, followed up and completed. Confirmation of the effectiveness of corrective and preventative action shall be undertaken.
7. In the event of a significant near miss (e.g. an incident that triggers a safety alert), incident or injury, work shall stop immediately and only resume once the necessary actions, including re-evaluation of any relevant risk assessments have been undertaken to reduce the risk of recurrence. Work shall only be permitted to recommence following formal authorization from appropriate senior management.

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8. The Business shall ensure that significant risks and incidents are communicated and information shared with other businesses in the SMM Group via Safety Alerts to allow risk assessment and preventative actions to be implemented in all similar workplaces, activities and operations.
 9. The Business shall ensure that Line Managers (including Frontline Supervisors) are trained to lead the injury and incident reporting and investigation processes, visibly demonstrating their felt leadership to drive to real and fundamental root causes, identify corrective actions, follow-up on close-out, and share lessons learned. Safety Professionals (alternatively termed Safety Managers or Advisors) shall support Line Management in this process in the role of internal consultant and key expert-resource/influencer/advisor.
 10. The Business shall ensure that processes are in place to periodically and effectively review the systems and processes so that they remain relevant and appropriate to the nature and extent of associated risk.



Safety Management Standard 12

AUDITS, MONITORING AND REVIEW

The Business shall ensure that workplace behavioral audits and system audits are routinely undertaken. Results shall be monitored and reviewed to identify trends and measure progress.

Requirements

1. The Business shall establish and maintain programs to monitor and measure safety performance on a periodic basis. Job Cycle Checks are a non-negotiable part of this process.
2. The Business shall undertake a baseline audit and establish, document and maintain a formal audit program that regularly monitors performance to the SimsMMway Safety Management Standards, Golden Rules and other elements of SimsMMway Safety.
3. The scope, frequency and methodology of the audit program shall be determined based on the results of risk assessments and the results of previous audits while being appropriate to the nature and scale of the hazards and associated risks.
4. The audit program shall include details of the specific competencies, roles and responsibilities and the requirements for conducting audits and reporting results.
5. Line Management shall be actively engaged in appropriate audits to ensure that effective visible felt leadership, mentoring and coaching are demonstrated.
6. The audit program shall include processes to ensure the effective monitoring and timely closure of actions.
7. The Business shall identify and monitor appropriate leading indicators of safety performance for the purposes of continual improvement.
8. Regional Directors and senior management shall have clear accountability for ensuring that the audit program is developed, implemented and reviewed to ensure continual improvement. Operational management shall have clear responsibility to ensure the audit program is implemented and maintained.
9. Senior management shall periodically review the Safety Management System to ensure its continuous implementation and effectiveness. This review shall be documented and address whether changes are required to policy objectives and other elements of the Safety Management System.



Safety has become part of my everyday working life as I am responsible for conducting OBAs on a daily basis. I do these in a positive spirit because I want to, not just because I have to.

Harry Bouland, Frontline Manager, Echt, Belgium.

The 14 SimsMMway Safety Golden Rules

Violation of these rules could lead to disciplinary action, including dismissal.

- | | |
|---------------------------------|---|
| 1 Safety Rules | Must be obeyed, this is a condition of employment for all personnel. |
| 2 Safe System of Work | All activities must be risk assessed. Full compliance with all key critical site safety procedures is mandatory. |
| 3 OBA's | All Senior Management, Line Management and Frontline Management must undertake OBA's. |
| 4 Mobile Plant | Must only be operated by trained personnel and must not be operated unsafely; safe distances must be observed. |
| 5 Guards | All guards and safety devices must be in place before any equipment is operated. |
| 6 LOTO | Plant and equipment must be isolated. Isolation must take into account any stored energy that may be present. |
| 7 Non-Routine Operations | Must be approved by responsible supervision, through the Non-Routine Risk Assessment/Authorization to Work process. |
| 8 PPE | All rules governing mandatory use of PPE must be followed. |

9 Housekeeping

Walkways and traffic routes must not be blocked nor compromised in any way, "A place for everything and everything in its place". Stock materials must be stored correctly with appropriate fire breaks as required.

10 Contractors

Safety-critical and high-risk activities and all non-routine maintenance and operations activities must be controlled under a Permit to Work system.

11 HazReps

All hazards, including unsafe acts, unsafe conditions and near misses must be recorded and reported to front line managers.

12 Accidents

Must be reported and investigated with findings communicated to ensure that no repeats can occur.

13 Plant

Will not be ordered without assessing the risks of the equipment or plant.

14 Tools and Equipment

Must be fit for purpose, be inspected prior to use and verified to be in good safe working order.

If you require further information please contact Line Management at your local site.

Notes



SIMS
METAL
MANAGEMENT