



**RESPONSIBLE CARE ®**

**EMPLOYEE HEALTH AND SAFETY**

**CODE OF MANAGEMENT PRACTICES**

Developed by  
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# EMPLOYEE HEALTH AND SAFETY CODE

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# EMPLOYEE HEALTH AND SAFETY CODE

## Introduction

This Code is aimed at protecting workers (including contractors) in the workplace and deals with the human factor rather than the equipment side of health and safety.

This Code calls for a commitment by management (including those required by law) of member companies to provide resources and mechanisms to identify and evaluate health and safety (H&S) hazards, control the risk or prevent them from causing harm to people at work and their workplace.

The Code also specifies training appropriate for workers which also requires their participation in developing and implementing health and safety programmes. As with the other Responsible Care Codes, self-audits to evaluate the effectiveness of health and safety programmes are also included.

One key issue of this Code is the requirement for companies to train contractors and sub-contractors who carry out work on their facilities.

The Code also includes safety of visitors to the facilities and procedures are to be drawn-up for their protection.

Generally, the Employee Health and Safety Code deals with people operating equipment and focuses on establishing, maintaining and improving H&S systems to provide safe and healthy working environment at all times.

## Scope

The scope of this Code covers the entire management of H&S of people at work with the site or organization which includes H&S Program Management, H&S Risk Identification & Evaluation, Prevention & Control of the H&S Risk and H&S Communication & Training to the stakeholders i.e. management, employees, contractors & visitors conducting business on / with the site.

## Objectives

The Code in general provides a framework for identifying and assessing occupational or work-related hazards, preventing unsafe acts and conditions, maintaining and improving H&S and fostering communications on H&S issues within the facility and community they operate.

## References

1. Gulf Petrochemicals & Chemicals Associations Responsible Care Codes dated January 1, 2018
2. ISO 45001: 2018

## **COMPLIANCE WITH RESPONSIBLE CARE GUIDING PRINCIPLES**

1. To develop and produce chemicals that can be manufactured, transported, used and disposed off safely.
2. To make H&S and environmental considerations a priority in planning for existing and new products and processes.
3. To operate plants and facilities in a manner that protects the environment, and H&S of employees and the public.

# MANAGEMENT PRACTICES AND IMPLEMENTATION GUIDELINES

The 18 Management Practices that protect and promote health and safety of people working at, or visiting company facilities:-

No.	Management Practices	Implementation Guidelines
<b>MANAGEMENT LEADERSHIP &amp; COMMITMENT</b>		
1	Commitment by all levels of management to protect and promote the health and safety of people who work at or visit company facilities, through : <ul style="list-style-type: none"> <li>• published policies;</li> <li>• accountability for implementation; and</li> <li>• provision of sufficient resources, including qualified health and safety personnel</li> </ul>	Management leadership and commitment in health & safety of people by: <ul style="list-style-type: none"> <li>• Demonstrating management leadership through written policy, management system, active participation and communication</li> <li>• Establishing goals and accountabilities / responsibilities for implementing employee health and safety program throughout the organization and continue to measure performance against these goals</li> <li>• Committing resources necessary to implement and maintain employee health and safety practices</li> </ul>
<b>STAKEHOLDER ENGAGEMENT</b>		
2	Opportunities for employees to continuously participate in the development, implementation and review of health and safety program where involvement, contribution and achievement will be recognized and rewarded accordingly	Provide opportunities for employees including contractors at all levels to continuously participate in the development, implementation and review stage of health and safety program such as: <ul style="list-style-type: none"> <li>• Employee Feedback, Survey &amp; Suggestion Scheme</li> <li>• Health &amp; Safety Procedures establishment, implementation &amp; review</li> <li>• Hazard Identification, Risk Assessment &amp; Risk Control (HIRARC) Activities</li> <li>• Health &amp; Safety Organizations, Programs &amp; Activities</li> <li>• Health &amp; Safety Trainings &amp; Communication</li> <li>• Personal Protective Equipment (PPE) Selection and Assessment</li> </ul> At the end, involvement, contribution and achievement will be recognized and rewarded accordingly.
<b>CONTRACTOR MANAGEMENT</b>		
3	Ensure contractors (including sub-contractors) management includes selection criteria, contractor H&S program, performance and contract review, consistent with applicable Management Practices of Employee Health and Safety Code	<ul style="list-style-type: none"> <li>• System in managing contractors shall be available, implemented and reviewed</li> <li>• Availability of a health &amp; safety policy, programs and performance measures are included as main criteria for the contractors during selection process</li> <li>• Safe, healthy &amp; effective equipment / facility provided and used on site by the contractor e.g. PPE and high risk / H&amp;S critical task equipment</li> </ul>

No.	Management Practices	Implementation Guidelines
		<ul style="list-style-type: none"> <li>• Appropriate health &amp; safety training of the assigned workers provided to ensure compliance with company's (as client) safety rules, procedures and practices related to the services provided</li> <li>• Contractors should also perform periodical check / audit on their H&amp;S system accordingly</li> <li>• Periodic review of contractor's safety performance</li> </ul>
<b>DOCUMENTATION &amp; PROGRAM</b>		
4	Written and current H&S documents e.g. procedures, work instructions, manuals & guidelines and programs which are appropriate to the H&S matters on site and re-evaluated for any changes and current good practice. It should be updated as and when necessary	The site should have a system in place to manage the generation, implementation, review, update, distribution & communication of all health & safety related documents and programs to all stakeholders. A written and updated H&S documentation system in place comprises of procedures, work instructions, manuals and programs
<b>AUDIT &amp; ASSESSMENT</b>		
5	Means to verify that the H&S documents and programs are effective and that actual practices are consistent with them	The site / facility should establish a system to verify the effectiveness & consistency of the H&S documents and programs vs actual practices by performing regular assessments or audits to identify and measure compliance level and if required, take corrective or improvement action accordingly
<b>RECORD &amp; PERFORMANCE REVIEW</b>		
6	Systems for maintaining records and analyzing data to evaluate health and safety (H&S) programs, determine trends and identify areas for improvement	<p>The site / facility should establish a system to record, analyze &amp; review H&amp;S performance by:</p> <ul style="list-style-type: none"> <li>• Maintaining health and safety data for analysis to determine trends, performance and improvement actions.</li> <li>• Establishing periodical reporting, monitoring and analysis of H&amp;S KPI via formal communication platform e.g. H&amp;S Committee or/and Management Review Meeting to ensure compliance and meet regulatory requirements</li> </ul>
<b>H&amp;S HAZARDS IDENTIFICATION</b>		
7	Methods to identify and review potential H&S hazards to employees (including contractors) and visitors in existing, new and to be modified site or facilities are in place and continuously improved	<p>A system is in place to identify and review potential H&amp;S hazards to employees (including contractors) and visitors for existing, new or to be modified plants, facilities &amp; processes based on the following source of information:</p> <ul style="list-style-type: none"> <li>• H&amp;S Hazards Analysis</li> <li>• Observation &amp; Inspection</li> <li>• Hazard Exposure Monitoring</li> <li>• Document Review</li> </ul>

No.	Management Practices	Implementation Guidelines
<b>RISK EVALUATION</b>		
8	Establish system to continuously evaluate and review level of H&S risk exposure on employee (including contractor) and visitor for existing, new or to be modified plants, facilities & processes	Establish means to continuously conduct periodic employee and visitor exposure assessment to evaluate H&S risks with respect to : <ul style="list-style-type: none"> <li>• Plants &amp; Processes</li> <li>• Biological Hazards</li> <li>• Chemical Hazards</li> <li>• Energy Hazards</li> <li>• Environmental Hazards</li> <li>• Ergonomical Hazards</li> <li>• Mechanical Hazards</li> <li>• Physical Hazards</li> <li>• Psycho-social Hazards</li> </ul> Records of exposure assessment should be maintained and regularly updated
<b>HEALTH FITNESS ASSESSMENT</b>		
9	Health assessment to determine employee medical fitness for specific high risk job tasks	<ul style="list-style-type: none"> <li>• Establish medical fitness standards for specific job tasks (e.g. working in confined space, working at heights, wearing breathing apparatus, etc.)</li> <li>• Conduct employee health assessment to these standards and</li> <li>• Maintain documented records</li> </ul>
<b>HEALTH SURVEILLANCE</b>		
10	Employee occupational health surveillance programs tailored to work- site hazards. For CHH, health surveillance comprises of Biological Monitoring, Biological Effect Monitoring & Medical Surveillance	Establish health surveillance program for employees exposed to particular hazard e.g. noise, heat, lead and asbestos and other chemical hazardous to health
<b>DESIGN REVIEW &amp; MANAGEMENT OF CHANGE</b>		
11	Mechanisms for reviewing the design and modification of facilities and job tasks, taking into account the following hierarchy of controls; inherently safer design, material substitution, engineering controls, administrative controls and personal protective equipment	Establish mechanism for reviewing the design and modification of facilities by having documented Process Hazard Analysis and Process Safety Review. Relevant approval gates should also be in place to steward the change. The hierarchy of design options employed to control or mitigate potential hazards associated with production processes shall be as follows : <ul style="list-style-type: none"> <li>• inherently safer design techniques</li> <li>• material substitution</li> <li>• active hardware controls</li> <li>• specific procedural or administrative controls</li> <li>• general safe work practices and procedures</li> <li>• personal protective equipment (PPE)</li> </ul>
<b>HEALTH &amp; SAFETY EQUIPMENT</b>		
12	Systems to verify that personal protective health and safety equipment is properly selected, maintained and used. Establish Systems for selection, issuance, use (including limitation) and maintenance of	Availability of the following system at each facility to ensure H&S equipment is safe and effective in protecting employees from exposure to workplace hazards:

No.	Management Practices	Implementation Guidelines
	<p>H&amp;S equipment* including training of employee in proper use of the equipment.</p> <p>*Example : PPE, first aid equipment &amp; facilities, fire-fighting equipment &amp; system, emergency shower, eye wash, alarm system &amp; devices, ladder, crane, lifting hoists, equipment fence, machine guarding, pressure vessels, elevators &amp; electrical tools</p>	<ul style="list-style-type: none"> <li>• Selection, Issuance, Use &amp; Maintenance of equipment</li> <li>• Training of Users</li> <li>• Consequence Management - Disciplinary measures to ensure proper use of equipment</li> </ul>
<b>HOUSEKEEPING &amp; PREVENTIVE MAINTENANCE</b>		
13	Establish an effective housekeeping and preventive maintenance systems for facilities, equipment, tools and vehicle / lifting truck to maintain and ensure the health and safety of users / employees at work	At each facility establish an effective housekeeping and preventive maintenance system for facilities, equipment, tools and vehicle / lifting truck such as policy, program, inspection, audit and review to ensure safety of facility, equipment and tools
<b>INCIDENT REPORTING, INVESTIGATION &amp; EFFECTIVENESS OF ACTION</b>		
14	Timely investigation of work-site illnesses, injuries and incidents, implement corrective actions to prevent recurrence and evaluate the effectiveness of corrective actions plan.	<p>Establish the following provision for all H&amp;S-related illnesses, injuries and incidents affecting employees (including contractors) and visitors at work:</p> <ul style="list-style-type: none"> <li>• All illnesses, injuries and incidents timely reported &amp; investigated</li> <li>• Every facility should have documented illness, injury and incident investigation system in place</li> <li>• Analyze historical incidences to determine trends and root causes, and corrective action to prevent recurrence.</li> <li>• Review action effectiveness</li> <li>• Share incident learnings with others to prevent recurrence</li> </ul>
<b>ORGANIZATIONAL, ENVIRONMENTAL &amp; INDIVIDUAL HEALTH</b>		
15	System on managing Organizational, Environmental & Individual Health for all stakeholders working on site to produce and maintain a healthy, productive and harmony workplace is in place	The site should establish policies & procedures including planning, promotion, implementation, monitoring and intervention on Organizational, Environmental & Individual Health for all stakeholders working on site
<b>EMERGENCY MEDICAL CARE &amp; OCCUPATIONAL HEALTHCARE</b>		
16	Provisions for emergency medical assistance and occupational healthcare for people at company site.	<p>Establish the following resources &amp; facilities on site :</p> <ul style="list-style-type: none"> <li>• Emergency Medical Care</li> <li>• Occupational Healthcare</li> </ul>
<b>COMMUNICATION</b>		
17	Communicate relevant H&S information to all stakeholders specific to the job function, task assigned and work site in general before, during and after work	<ul style="list-style-type: none"> <li>• At each facility, establish and implement effective a two-way communication system for conveying H&amp;S information regarding public announcement, work site, job function, task assigned to relevant stakeholders i.e. employees, contractors, visitors,</li> </ul>



No.	Management Practices	Implementation Guidelines
		customers and surrounding community <ul style="list-style-type: none"> <li>• Maintain regular communication and updates with stakeholders of such information based on the latest development / public announcements or amendments to regulations and standards</li> </ul>
<b>TRAINING</b>		
18	H&S training programs provided to employees including contractors with appropriate documentation and methods to evaluate the effectiveness of both training & re-training activities	<ul style="list-style-type: none"> <li>• All employees shall receive health and safety training appropriate to their job function or task assigned</li> <li>• Provide additional refresher training as and when necessary</li> <li>• All trainings shall be documented and regularly evaluated to ensure effectiveness</li> </ul>

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