

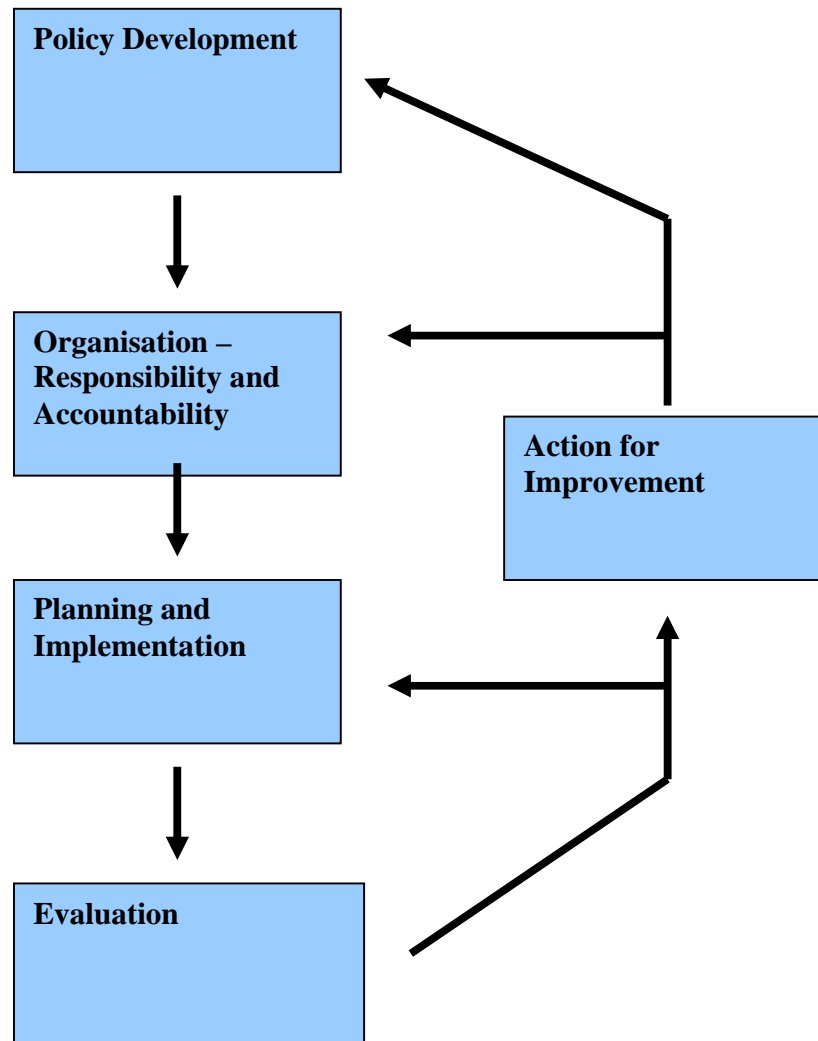
Chapter Two: Policy and Implementation

2.1. Introduction

As a factory owner or manager, you cannot simply look at health and safety problems on an *ad hoc* basis and hope that the conditions in your workplace comply with national and international standards. Any preventive and control measures that need to be introduced into the workplace have to be carefully planned in consultation with all stakeholders and based upon a clear, well-defined policy that can then be implemented, evaluated and improved continuously throughout the factory.

The key elements of successful health and safety management are shown in Figure 1.

Figure 1¹:



¹ Adapted from Successful Health and Safety Management, Health and Safety Executive, UK, (1992).

2.2. Core Information

Let us look at these key elements in more detail:

Policy Development

Effective health and safety management requires the development of comprehensive policies which not only meet national/international standards but also contribute to the overall business performance of your company. An OSH policy is an overall plan or course of action to be adopted to improve health and safety in the factory. The rationale behind the policy is that it must be specific to your factory and should set out the organisational arrangements and procedures necessary to ensure a safe and healthy place of work. In other words it should specify the who, what, when, why, where and how questions so that everyone understands your company's approach to health and safety as well as its response. The policies have to be cost effective and aimed at achieving a safe and healthy working environment whilst at the same time reducing financial losses and liabilities. The policy is important because it represents a basic **action plan** for your company as a whole.

It should include, as a minimum, the following key principles and objectives² to which your company is committed:

- protecting the health and safety of **all** members of staff by preventing work-related injuries, unsafe occurrences, ill health and diseases;
- complying with all relevant Cambodian laws and regulations (see Appendix 1), any collective agreements, the buyers codes of conduct relating to occupational health and safety and working conditions that apply to your company;
- ensuring that workers and their representatives are consulted and encouraged to participate actively in all elements of the health and safety management system (Workers' participation has been found to be an essential component of all successful health and safety management systems).

The health and safety policy for your company should be in written form and be concise, readily understood by all stakeholders, approved/dated by the managing director/board, and brought to the attention of all workers, supervisors, managers, etc.

It should also:

- allocate the various responsibilities on occupational health and safety to designated personnel;
- specify employers' responsibilities; workers' rights and duties; and the importance of joint action through institutions such as health and safety committees;

² ILO – Guidelines on Occupational Safety and Health Management Systems, ILO-OSH 2001.

- be in a format and language that all workers can understand. In a case where literacy levels may be low, alternative methods have to be used to explain the policy;
- be displayed prominently throughout the factory and explained in detail to all new workers;
- be regularly reviewed to meet new challenges in the workplace or improved if an evaluation exercise shows that the policy is not meeting its objectives or new forms of technology are being introduced and were not covered under the existing policy;

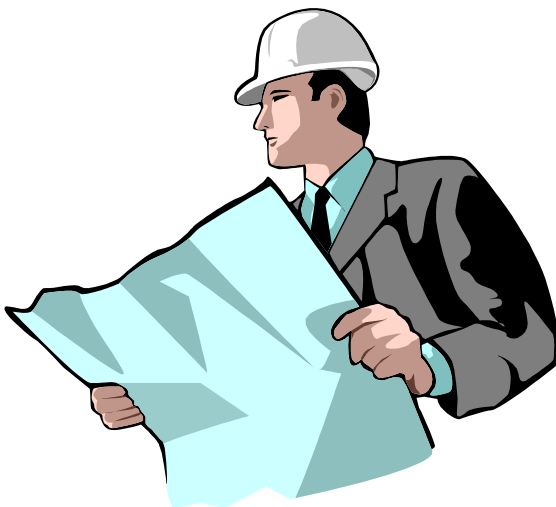


Figure 2:
Careful planning is required when developing an effective occupational health and safety management system in your factory.

So, if your Company or factory already has a health and safety policy or is in the process of developing one, how do you know if it is appropriate? Here are some basic questions that you need to ask yourself when cross-checking the policy³:

- **Does the policy statement express a commitment to health and safety in your factory and are your obligations towards your workers made clear?**
- **Does the policy specifically identify who is responsible at all levels of the Company for its implementation and continuous review? Further, does it indicate how this will be done?**
- **Is the policy signed by the owner or the managing director and dated?**
- **Have the views of managers, supervisors, workers/their safety representative, and of the safety committee (if it exists) been taken into account?**
- **Were the duties described and assigned in the policy discussed and agreed with the people concerned? Do they clearly understand their duties/responsibilities, how much time they have set aside to carry out these duties, and what resources, if any, they have at their disposal?**
- **Does the policy make reference to the importance of workers' participation and co-operation? For example does it refer to workers taking part in joint inspections or being active members of health and safety committees;**

- **Does it say who is responsible for the following matters and replaces the designated person should they be absent from work;**
 - **reporting investigations and recording accidents;**
 - **fire precautions, fire drills, evacuation procedures;**
 - **first aid;**
 - **training etc.**

So it is worth repeating that your health and safety policy is a basic action plan which links tasks and arrangements to specific people in your factory to ensure a safe and healthy place of work. Quite apart from satisfying Cambodian legal requirements as specified under the relevant regulations, and the standards laid down in international instruments and the buyers' codes of conduct, a well thought out policy, that has been prepared in consultation with all stakeholders, can bring real competitive advantage and social benefit.

Organisation – Responsibility and Accountability

It is no good having the best policy as a written document unless it is put into practice and this requires organisation. This involves establishing responsibilities and relationships which promote a positive health and safety culture throughout the company from top to bottom. It must be emphasised that it is the employers who have overall responsibility for the protection of workers' health and safety. As the owner or managing director of your garment factory it is up to you to provide leadership for health and safety activities. Following full consultation and agreement with all stakeholders it is your duty to allocate responsibility, accountability and authority for the development, implementation and performance of your health and safety policy. This ranges from ensuring that health and safety is a line management responsibility which is known and accepted at all levels, to establishing effective arrangements to identify, measure (if possible) and control work-related hazards and risks and to promote health at work. It is also your responsibility to ensure that arrangements are made for the full participation of workers and their representatives in the successful development and implementation of the health and safety policy. The appropriate resources (time, money, training etc.) have to be provided so that those workers and employers given responsibility for health and safety in the factory can carry out their duties properly.

Other areas include:

- assisting with the establishment of a joint health and safety committee;
- ensuring that the designated people have the relevant competences to perform their duties on health and safety;
- ensuring that the requisite health and safety training is carried out throughout the factory at no cost to the workers;
- making sure that all workers understand the policy and can identify who is responsible for which areas so that any problems can be reported;
- keeping full records of inspections, accidents, ill health etc;
- obtaining from suppliers full details of products used (e.g. Material Safety Data Sheets on all chemicals used in the factory);

- providing a two-way communication system so that senior management can report health and safety issues to the workforce and vice versa;
- ensuring that health and safety in the factory is a dynamic, on-going activity in the factory and not just introduced at the time of a visit by a Labour Inspector, an ILO Monitor or a Brand Compliance Inspector.

REMEMBER:

- 1. Management has no role in the selection of any workers' representatives who may be part of a joint health and safety committee. It is up to the workers to elect their own representative!**
- 2. Some companies say "they take health and safety seriously" because they have a "safety officer". All too often these safety officers are individuals who work in isolation and have little or no training in health and safety.**

Planning and Implementation

Having developed the policy and made the organisational arrangements, it's now time to implement the policy – this requires careful planning and co-ordination to be successful. This involves an initial inspection of your factory using the checklist provided with this manual to identify for example:

- how the current national regulations, international standards and the buyers' code of conduct, if appropriate, are being applied;
- what hazards and risks to health and safety may be present in your factory (see section on risk mapping and use of the checklist);
- any control measures that may be available and assess their effectiveness;
- the extent of emergency prevention, preparedness and response times as for example in the case of fire in the factory;
- analyse data from accident/sickness register etc;
- the arrangements for the provision of first aid;
- what arrangements are in place or need to be introduced to ensure workers' consultation, co-operation and, most importantly, their active participation;
- any special arrangements required for the procurement of goods and services;
- any special arrangements for sub-contractors, contractors on site or visitors to the factory.

Once this initial inspection has taken place (it may take several days to audit the entire factory in detail), it is important to minimise risks to health and safety by drawing up plans, establishing priorities based upon relative risks, setting performance standards for management action and establishing a realistic timetable. This gives you a baseline against which all future standards can be measured.

Evaluation

It is essential to monitor your health and safety performance on a regular basis – all too often, good initial progress and enthusiasm wanes and standards slip. It is up to management to establish procedures to monitor, measure and record health and safety performance in the factory. Such procedures could involve regular inspections by members of the health and safety committee, seeking advice from the Labour Inspectorate, analysing data such as sickness or accident records. Companies that have good health and safety records, measure their performance on a regular basis against pre-determined plans and agreed standards and are continually “fine-tuning” so as to improve performance.

Given below is a checklist that will help you to assess the level of preparedness of the health and safety management system in your factory. If you answer “**No**” to many of these questions you will need to take action. The type of action can be noted in the box “**Action required**”.

2.3. Policy and Implementation Checklist

	Yes	No	Action required
Does the Factory have a written OSH policy?			
Is someone from senior management responsible for implementing the policy?			
Is a separate budget available for implementing the policy?			
Are copies of the policy displayed in the factory?			
Are copies of the policy available in local languages and explained to the workers?			
Were workers consulted in drawing up the policy?			
Is there a health and safety committee at the factory?			
Are workers involved on this committee?			
Do all workers receive health and safety training and understand the provisions of the policy?			
Are there safety representatives (management and/or workers) in the factory?			
Have these safety representatives received training?			
Is your factory covered by the Cambodian regulations on occupational health and safety?			
Are management and workers aware of the provisions the OSH regulations?			
Are copies of these OSH regulations available for management and workers to consult?			
Have the Labour Inspectorate visited the workplace in the last 12 months?			

2.3. Policy and Implementation Checklist (continued)

Have any prohibition or improvement notices on grounds of OSH ever been issued by the Labour Inspectorate to the factory?			
Is the factory covered by a buyer code of conduct?			
Do the buyers inspect the factory to ensure compliance in the area of health and safety?			

2.4. Summary

Remember, the introduction of a good health and safety management system not only improves working conditions for the workers it also has a positive impact on the balance sheet through increased productivity, fewer accidents and ill health, high staff morale, less staff turnover, and a positive image to the buyers.

A successful health and safety management system is made up of:

- policy development;
- organisation – responsibility and accountability;
- planning and implementation;
- evaluation.

This requires consultation, co-operation and commitment from all stakeholders. Workers' participation is seen as a vital part of the process.

Some authorities give guidance on the preparation of a health and safety policy. An example from the Health and Safety Executive in the UK is given in Appendix 2.