

**Revision History**

<b>Description</b>	<b>Last Rev No.</b>	<b>Current revision No.</b>	<b>Amendments made</b>
SW/HSE/P05-Rev00	NA	00	New Document
SW/HSE/P05	00	01	The Corporate HSE function was removed.

## 1. PURPOSE AND SCOPE

The purpose of this procedure is to define the method to:

- Determine the competence of the person who can affect the HSE performance and fulfilment of compliance obligations.
- Determine training needs associated with OHS hazards & environmental aspects of its activities and HSEMS.
- Ensure that these persons are competent based on appropriate education, training, awareness, and experience.
- Ensure that all those whose work may create a significant impact on the environment or not-acceptable risks have received appropriate training.
- Ensures employees at each relevant function and level are aware of HSE information relevant to them.
- Establish a process for internal & external communication relevant to HSE and ensure they are captured and responded to.

## 2. APPLICABILITY:

This procedure applies to the Sterling & Wilson Project and Operations

## 3. RESPONSIBILITY:

MA, Project Manager, Site HSE, HR, HODs, Business HSE, Corporate HSE

## 4. DEFINITIONS

- **Competence:** Demonstrated personal attributes and demonstrated ability to apply knowledge and skills
- **Continual improvement:** Recurring process of enhancing the HSE management system to achieve improvements in overall HSE performance consistent with the HSE policy.
- **Internal communication:** Communication to the employees by management and responding to inquiries/requests/ complaints raised by the employees related to the activities within the organisation related to HSEMS.
- **External communication:** Communication to the external interested parties by management and responding to inquiries/ requests by the external interested parties and customer requirements, related to the activities within the organisation related to HSEMS.
- **Worker Consultation:** Seeking views before making a decision.

**5. DESCRIPTION OF PROCEDURE:**

5.1 To ensure that competent persons are deployed for critical jobs and all employees are aware of HSEMS below are steps to be followed.

Input	Process	Output	Resp
<b>Awareness and Competency management for onsite employees</b>			
Inputs for competency will be determined through the: <ul style="list-style-type: none"> <li>• Job group from Employee Feed</li> <li>• Job descriptions</li> <li>• Legal requirements</li> <li>• HIRA and AIA for critical activities</li> </ul>			
	Determine competency requirements through different Job groups and required skill sets	- competency matrix - Competency assessment checklist	Site HSE/ Engineer / HR/ Business HSE
	Competency Assessment	Decision on Competent / Not competent / Pending competency	Site HSE/ Engineer / HR / Business HSE
Inputs for training will be determined through: <ul style="list-style-type: none"> <li>- Competency matrix</li> <li>- HIRA-AIA assessment</li> <li>- Accident investigation outcome</li> <li>- Legal requirement</li> <li>- Job Skill requirement</li> <li>- Site-specific HSE requirement</li> <li>- EPRP</li> <li>- Change management requirements</li> <li>- HSE interface matrix with Business functions</li> <li>- ESIA – EMPs</li> </ul>			
	- Determine the Training requirements for different Job Group - Determine the training requirements for critical functions, which may	Training Matrix	Site HSE/PM  HR/ Business HSE

	influence the HSE performance		
Inputs for Scheduling a training will be - Training matrix - Employee Feed	Scheduling of Training	List of schedules of training in the online HSE portal	Business HSE/ Site HSE/ PM / HR/ L&D/KM
Input for conducting the training - Training Matrix - Training Schedule			
	Conduct the training as per the training matrix and Schedule	Training Records on Online HSE Portal	Business HSE/ Site HSE/ PM / HR/ L&D/KM
	Immediate training effectiveness assessment through questionnaires for groups	Effectiveness Record on Online HSE Portal	Site HSE/ PM
	If found unsuitable (score below 60 points), retraining to be conducted	Records to be maintained	Site HSE/ PM
	Training effectiveness assessment through observations on group activity and feedback from supervisors after 15 days for employees at the site	Effectiveness Record on Online HSE Portal	Site HSE/ PM
	If found unsuitable, retraining to be conducted	Records to be maintained	Site HSE/ PM

- The process described above will be followed to conduct the HSE training.
- Employee feed will be updated on the online HSE portal after completion of the HSE Induction at the site. Hence if the employee's name appears in the employee feed, it will be construed that the employee has undergone the HSE training.
- For employees at the office, HSE induction is part of the Joining Induction Program, and a record of the same is maintained by HR.
- For employees at the office, a training effectiveness assessment will be conducted soon after the training and it would be sufficed.
- In case of any change as per the change management process, required training will be imparted.
- Training is conducted either through online, on-the-job, classroom, and visual displays modes.
- Toolbox training is imparted at site job locations to the groups. The records are maintained on the online HSE portal.
- Visitor induction training will be conducted at the site at the security gate. After completion of the training and arranging all required PPEs the visitor's pass will be issued. Records will be maintained in the visitor's register.

**5.2 Internal and External Communication would happen as per the following matrix:**

<b>What to Communicate</b>	<b>Target Group/ Who to communication</b>	<b>When to Communicate</b>	<b>How to communicate</b>	<b>Responsibility</b>
<b>Internal Stakeholders</b>				
HSE Policy and Mandatory Rules	All on Site	Commencement to Work	Display at prominent location thru Safety mascot-WILSON and security gate	Site HSE
HSE hazards-Risks / Aspects-impacts	All workforce, supervisors, engineers, Visitors	Commencement and execution. Change in work methodology/new equipment	Induction training. Toolbox talks/ Posters/ Signage Safety Suggestion Hazard observation	All workforce, supervisors, engineers, Visitors
Communication on HSE Performance	All	During the project lifecycle	Through display sign boards	PM/Site HSE
HSE Objectives and Program	All on Site	Commencement to Work	Induction training, Committee meetings	Site HSE / PM
Legal Requirements including half-yearly returns	All workforce, supervisors, engineers	After site mobilization	Online HSE portal, Induction training, HSE committee meetings	Site HSE / PM
Emergency Procedure and First Aid facilities	All	On-site entry	Site induction Job specific training	Site HSE / Site Security
Incident Information	Workforce, Supervisors,	On occurrence and lesson learnt report	Toolbox talks Reporting to clients	Site HSE / PM

<b>What to Communicate</b>	<b>Target Group/ Who to communication</b>	<b>When to Communicate</b>	<b>How to communicate</b>	<b>Responsibility</b>
and Learnings from Incidents & Near Miss	Engineers, Management		thru email Reporting to SW Management thru Email/ Online HSE Portal	
Audit findings	Engineers, In charge, PM, Client	Immediate thru the online portal	Portal and Email	Site HSE / PM
Changes in execution methodology/ machinery / Drawing/ Design	Engineers/workers / sub-contractors	Within 1 day of any change in the risk, the equation is anticipated due to changes in execution methods/equipment	Team Meetings and MOMs Change in HIRA-AIA	Site HSE/ PM
Grievances received from external bodies	Grievance redressal team (HSE manager, Project manager, admin manager, project director, client reps)	As and when received	Team Meetings and MOMs	PM/ Team
<b>External Stakeholders</b>				
HSE Policy/ Any cautions regarding site work	Local Public Client Supplier/Vendor Authorities	Throughout the project work	HSE Policy on the SW website Safety Mascot - Wilson Display Signages Warning signs	Corp Com/ HSE/PM

What to Communicate	Target Group/ Who to communication	When to Communicate	How to communicate	Responsibility
Communication on HSE Performance	All	During the project lifecycle	Through display sign boards	PM/Site HSE
Any major HSE incidents	Client/Government Authorities	As and when occurred	Incident Reports	Project and Client
Project related update	Media	In consultation with the Client, the Management will identify the representative Corporate Communication team for SW related Media interaction		
Receiving Stakeholder Grievances	From Local Public/ Govt Authorities/ media	To be captured thru the communication register at the security gate, Emails, and post box at the entry gate. Display of HSE/PM contact person at the Security gate.		

**5.3 Consultation and Participation**

Consultation and Participation	Reference	Responsibility
<b>With contracted worker</b>		
<b>Modes of Participation and Consultation</b>		
5.3.1 Involve employees in hazard identification and risk assessment activities in their respective areas through general on-site discussions with senior workers.	HIRA-AIA register	Project Managers / Site HSE
5.3.2 The participation & consultation arrangements for workmen, supervisory staff, and managers for raising concerns on HSE-related matters will be ensured through: <ul style="list-style-type: none"> <li>• HSE Committee meetings / Contractor HSE meetings,</li> <li>• During TBT / Training</li> <li>• Mock drills / EPRP</li> <li>• Safety Week campaign</li> <li>• HSE motivational program</li> <li>• Near Miss communication</li> <li>• Hazard Reporting</li> <li>• Safety Suggestions</li> </ul>	MOM, Mock drill records Training/TBT Records Near miss report Hazard Observation Report, Safety suggestions Accident Reporting Lesson Learnt NC	Site HSE / Project Managers/ Construction Manager/ Engineers/ Supervisory Staff/ workers

<ul style="list-style-type: none"> <li>• Incident investigation and nonconformities</li> <li>• Determining corrective actions</li> </ul>		
5.3.3.1 Provide HSE guidelines to approved contractors and training will be imparted to the workers on these HSE guidelines.	WO/PO	SCM / PM/ Site HSE/ Construction Manager
5.3.3.2 Evaluation of the worker's and employee's participation to build and sustain the HSE culture will be carried out through Contractor Index, Site HSE Index, and Contractor evaluation.	Site Rating and Contractor HSE rating	SCM / PM/ Site HSE/ Construction Manager
5.3.3.3 Actions to be taken against the contractors in case of deviation from the HSE guidelines by them	As per contractual T&Cs of the sub-contractors	PM/ Site HSE/ Construction Manager



## 6. FORMATS APPLICABLE

S. No.	Format No.	Title
1	SW/HSE/F223	Training Need Identification
2	SW/HSE/F448	Competency Matrix
4	SW/HSE/F407	Toolbox Talk
5	Site Specific	Safety Passport

### Annex-1 SAFETY PASSPORT

TRAINING RECORDS			
TOPIC	DATE	REMARKS	TRAINERS NAME & SIGN
HSE Induction PPE, OH&AS 			
Network 			
Height Work 			
Electrical Safety and LOTO 			
Safe Lifting & Rigging 			
Emergency Procedure and Fire Control 			
Tool Safety 			
Others 			

  

EMERGENCY CONTACT NO.		
INTERNAL		EXTERNAL
NAME & DESIGNATION	CONTACT NO.	HOSPITAL:
		FIRE:
		POLICE:
		AMBULANCE:

  

#### MANDATORY SITE SAFETY RULES

Induction must on the first entry at site

Strict Compliance of usages of PPEs & anchoring of safety harness

Never exceed speed limit

Never use mobile while at job / driving / riding

Alcohol & Drugs are strictly prohibited

Only Qualified workers are authorized for electrical job

Safety belt is Must for drivers & all co-passengers

Driving Permitted only with valid driving license

  

#### EMERGENCY RESPONSE GUIDELINES

You should have a good understanding of your working environment and the instructions given by your supervisor. When evacuation is required in an emergency, you should keep calm and find out:

- What is the dangerous situation?
- The routes for evacuation
- Designated safe assembly area

**When someone is found seriously injured, you should:**

- Keep calm
- Seek help immediately
- Accompany the injured person
- Assist in the immediate rescue work as far as possible
- Call the site safety staff
- Do not try to move the injured person unless it is really necessary to do so
- Do not tamper with the accident scene while waiting for the arrival of the investigation team

**When a fire breaks out, you should remember:**

- Put out the fire with a fire extinguisher if it is a small fire
- If the blaze is out of control, do not try to extinguish the fire on your own
- Inform the supervisors / Engineers and safety department

**Emergency Telephone numbers:**

- Always pay attention to the emergency telephone numbers posted on the notice board in the site office and vantage points at sites

**STERLING & WILSON**

**HEALTH, SAFETY & ENVIRONMENT (HSE) POLICY**

We, at Sterling & Wilson, recognize that high standards of health, safety and environmental protection are integral for the growth of the organization and its people. We are committed to providing a safe and healthy workplace for all employees, and preventing any untoward incidents, accidents, injury and/or ill health of any employees, contractors, and other relevant stakeholders. We also aim to take adequate measures to protect the environment and prevent environmental pollution.

The company's senior management recognizes the importance of HSE to achieve and sustain excellence in our business, therefore, with the cooperation of all employees, we endeavor to continually improve our HSE Management System by committing to:

- Incorporating HSE considerations in the business decisions and operations of the organization
- Adopting preventive measures in our business processes and practices
- Promoting awareness among employees, contractors, business partners and other stakeholders to develop a positive HSE culture within the organization
- Striving to achieve a zero-accident rate by establishing accountability along with an HSE mindset at all levels of the organization
- Providing information and imparting training (including emergency and crisis management) to employees, contractors, and other relevant stakeholders to ensure HSE requirements are met at all times
- Striving to reduce our environmental impact through optimization of waste generation, preservation of natural resources and environmental conservation and activities
- Maintaining proper equipment, or utilization of resources that minimize environmental risks
- Developing effective planning and monitoring systems to periodically review the organization's health and safety performance and identify potential errors, and to ensure that corrective actions are initiated to reduce their impact

Communication, consultation, participation and collaboration among all employees and stakeholders will uphold the principles of this policy. Responsibility for compliance to this policy rests with all the employees of the company. They shall support its implementation by using the safety equipment issued to them, familiarizing themselves with the safety rules/procedures of the organization and enforcing appropriate corrective measures if violations are reported at job sites.

This HSE Policy will be implemented in accordance with applicable statutory requirements, safety and health regulations, and standards codes of practice of our customers. It shall be reviewed every two years. It will be displayed prominently on the office premises, and access to the detailed HSE manual will also be available for reference by any employee.

Sd/-  
Khurshid Darwala  
Chairman

30th May, 2019

**ANY VIOLATION OF THESE RULES LEADS TO TERMINATION FROM SITE**

**SITE SAFETY RESPONSIBILITY**

Every one working in this site has their individual responsibility to control safety risk at site execution, which included but are not limited to:

- Follow all site safety policies and procedures all the time, every time.
- Take active participation in the identification and control of risks in the workplace
- Report immediately all hazards and dangerous occurrences.
- 100% adherence to PPEs all the time, every time
- Refrain from misuse of PPEs / equipment or bypass safety system
- 100% active participation in safety training / Tool box talks etc. at site
- Understand emergency procedure and follow it during emergency
- Start any activity only if you have the knowledge & skill for that job
- Maintain discipline at site, horseplay is strictly provided
- Maintain housekeeping of your work area all the time, every time
- Follow the instruction of site safety personnel / supervisor

**SAFETY VIOLATION & CARD PUNCH RECORDS:**

Violation in the site safety rules will attract punching in your safety passport, depending upon the gravity of the violation, and under sole discretion of the S&W / client's safety manager

●  
REPRIMAND

●  
WARNING

●  
FINAL WARNING

●  
TERMINATION FROM SITE

**STERLING & WILSON**

**SAFETY PASSPORT**

**NAME OF THE PROJECT :**

Passport  
Size Photo  
(Please paste your colour photo, do not staple)

Name: .....

Son of: .....

Contractor: .....

Id No: .....

Issued On: ..... Valid Thru: .....

Authorised to work as: .....

Authorised signature with name: .....

Permanent Address: .....

Age & sex: ..... Blood Group: .....

In case of personal emergency, please call: .....

Nearest Police Station of Permanent: .....

Residence: .....