# **ECRP ESMF - Annex 5**

# FRAMEWORK FOR ACTIONS ON OCCUPATIONAL HEALTH AND SAFETY UNDER YEMEN EMERENCY CRISIS RESPONSE PROJECT

**26<sup>th</sup> January**, **2019** 

**Prepared by** 

**Dr Shubhendu Mudgal OHS International Consultant** 

With support from Mr Abdulhafed Al-Magrabi, OHS National Consultant

Submitted to

The Team Leader, Economic Resilience and recovery, United Nation Development Program Country Office for Republic of Yemen

# List of contents-

- 1. Introduction
- 2. Regulatory and other requirements
- 3. Implementing agencies and partners
- 4. OHS organisation within overall management structure
- 5. OHS management policy, strategy and procedures
  - 5.1 Hazard identification, risk assessment and determining controls
  - 5.2 Objectives and programs
  - 5.3 Contract management for OHS
- 6. OHS management elements
  - 6.1 Operational controls
  - 6.2 Competence, training and awareness
  - 6.3 Communication, participation and consultation
  - 6.4 **Documentation**
  - 6.5 Emergency preparedness and response
- **7** OHS Monitoring and evaluation
  - 7.1 Performance measurement and monitoring
  - 7.2 Internal audit
  - 7.3 Key monitoring indicators on OHS
  - 7.4 Management Review
  - 7.5 Toolkit for OHS management framework implementation support

### 1. Introduction

UNDP, in partnership with the World Bank, is currently implementing the Yemen Emergency Crisis Response Project (ECRP) to deliver critically needed livelihood support and service delivery to a population hit hard by the ongoing conflict in Yemen. The project consists of approx. 2000 sub-projects. Two local institutions are the Implementing Parties (IPs): The Social Fund for Development (SFD) and the Public Works Project (PWP). SFD is responsible for implementation of labour-intensive cash-for-work interventions in all governorates of Yemen and small community infrastructure and initiatives; and PWP is responsible for the implementation of small community infrastructure through local contractors.

The project aims to mitigate the impact of the current crisis on local households and communities and assist their recovery from the bottom-up using local systems, capacities and institutions to progressively resume and scale-up service delivery. The project aims to achieve specific results in: 1) Increasing short-term employment and livelihoods opportunities; 2) Reviving the local private sector; 3) Restoring key service delivery through small-scale infrastructure.

The project falls under the UNDP's Yemen Resilience Program which has three main thematic areas: youth employment and livelihoods, service restoration, and peace building. The project contributes to the livelihood restoration and service delivery restoration components of UNDP's Yemen Resilience Programme.

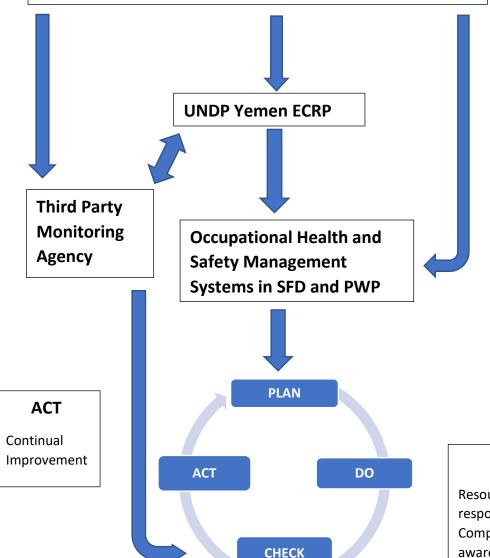
UNDP has commissioned consultancy services consisting of an international and national consultant to improve the OHS systems to bring it to international standards. The consultancy service aims to: 1) conduct through gap analysis of the labour standards and Occupational Health and Safety (OHS) systems in place in the project, defining the legal boundaries between UNDP, the Government and the IPs in the current crisis context, 2) develop a labour management and OHS framework for the ECRP that outlines key labour and OHS requirements and accountability mechanisms for all partners, and 3) address gaps by revising IP operation manuals, checklists, and training IP and building IPs institutional capacity to implement labour standards, particularly OHS procedures. This includes provisions related to community health, safety and working conditions as described in Standard 3 of UNDP Social and Environmental Standards), including the need for promoting Decent Working conditions including measures to respect and promote workers' rights and ensuring that project workers have safe and healthy working conditions to prevent accidents, injuries, and disease at project worksites. As part of the assignment, effective measures and policies are being introduced to prevent, control, reduce or eliminate occupational hazards and risks.

Based upon the gap assessment of key stakeholders i.e. Implementation partners- SFD and PWP, Third Party Monitoring Agency and UNDP -Yemen ECRP by the consultants, the following conceptual framework for OHS within ECRP is recommended for implementation.

# **OHS FRAMEWORK FOR YEMEN ECRP- MATRIX**

# **Regulatory and other requirements**

(International codes and best practices, UNDP SES, WB Guidelines, Yemen national Labour code, construction sector guidelines and best practices etc.)



# **CHECK**

OHS Performance Incidents Monitoring Legal Compliance Internal audits Management Review

# **PLAN**

OHS Policy
Legal and other
requirements
Hazards
identification Risk
Assessment and
Controls
Objectives and
programs

# DO

Resources, roles, responsibility
Competence, training awareness
Communication, participation and consultation
Documentation and document control
Operational controls
Emergency
preparedness and response

# **OHS FRAMEWORK FOR YEMEN ECRP - ELEMENTS**

Regulatory and other requirements (International codes and best practices, UNDP SES, IFC standards, Yemen National Labour code etc.) Implementing agency and implemention partners (UNDP, TPMA, SFD and PWP) OHS organisation within overall management system (OHS management organisation within UNDP, SFD, PWP) OHS management policy, strategy and procedures (Based on OHS risk assessment, resources allocation, contracts management) ( OHS risks prevention and control measures, work environment monitoring, incidents and accidents management, training and capacity building ) OHS monitoring and evaluation ( Proactive and reactive monitoring)

The IPs shall develop and implement OHS Management System as a vehicle for managing their OHS hazards and risks and as an instrument for continual i.e. stepwise progressive improvement in their management of OHS. The elements of the various elements of OHSMS shall confirm to the requirements as set by international standards on OHSMS e.g. ILO-OSHMS, 2001, OHSAS 18001, 2007.

The elements that shall be developed and implemented include-

# 2. Regulatory and other requirements

The regulatory and other requirements set the measures to be in place in order to confirm the measures to national regulations, international codes and best practices etc. These also include sector specific requirements that relate to construction work, a hazardous sector in present project. These cover the international guidance and recommendations e.g. ILO convention, recommendations and codes of practice in Construction, World Bank group EHS standards, UNDP Social and environmental standards etc. Being implemented by UNDP, the UNDP SES standards have to be complied with. The SES in standard 3, covers community health, safety and working conditions. In addition, the implementing organisations have to be fully compliant with national and local applicable regulations e.g. Labour Code, Act No.5 of 1995, Republic of Yemen that includes OHS requirements for workplaces. The proposed framework for actions on OHS also incorporates examples of best practices on OHS e.g. The World Bank Group General EHS Guidelines that include construction activities also.

Safety and health in construction Convention, 1988 (No.167) of International Labour Organisation (ILO) is the key convention concerning safety and health in construction. The convention defines activities under Construction and specifies preventive and protective provisions to be in place for the construction sites. Safety and Health in Construction Recommendation, 1988 (No. 175) of ILO, recommends preventive and protective measures for the provisions as specified under the Convention C167. Republic of Yemen has not yet ratified the Convention 167.

Safety and health in construction: An ILO code of practice, International Labour Office, 1992 provides practical guidance on provides guidance in the implementation of the provisions of the Safety and Health in Construction Convention, 1988 (No. 167), and the Safety and Health in Construction Recommendation, 1988 (No. 175). The code provides guidance for a legal, administrative, technical and educational framework for safety and health in construction.

United Nations Development Program (UNDP) Safety and Environmental Standards (SES) includes provisions related to community health, safety and working conditions (Standard 3), including the need to respect and promote workers' rights and that project workers have safe and healthy working conditions to prevent accidents, injuries, and diseases.

As part of the OHS framework for action, the IPs shall establish, implement and maintain procedures for identifying and accessing the legal and other OH&S requirements that are applicable to it. The IPs shall ensure that these applicable legal requirements and other requirements to which the organization subscribes are taken into account in establishing, implementing and maintaining its OH&S management system.

The relevant information on legal and other requirements shall be communicated to persons working under the control of the organization, and other relevant interested parties. Interested parties may include communities near project sites, local organizations etc.

The IPs shall establish, implement and maintain procedures for periodically evaluating compliance with applicable legal and other requirements. The records of the results of the periodic evaluations and other legal information shall be kept up to date.

# 3. Implementing agencies and partners

UNDP is the main implementation agency under the project with SFD and PWP as implementing partners. The activities of the project need to be in full compliance with UNDP Social and Environment Standards. UNDP-Yemen has been monitoring the project activities through a Third-Party Monitoring Agency on quarterly basis. The monitoring includes OHS issues with the activities.

All the implementing organisations i.e. UNDP, SFD and PWP have well developed general management structure and follow standard management practices for strategic and operational management of their activities. Though IPs have been working for long on construction activities that require basic health and safety as part of overall implementation, yet OHS management as part of a definite organised system under overall organisational management structure is relatively new for the IPs.

The IPs have in consultation with and support from UNDP, initiated range of activities on OHS that include developing OHS policy and procedures, assigning responsibilities on OHS, Hazards identification and risk assessment, injuries monitoring and management and training on hazards and controls, etc. However, to integrate such initiatives into a coordinated system, the various elements as described under the present framework are intended to be implemented.

### 4. OHS organisation within overall management structure

Clearly defined roles and responsibilities of key personnel along with authority and availability of resources are essential for planning and managing the OHS elements under the framework. The key roles and responsibilities of key personnel on OHS shall include following-

### Project Management Team (PMT/UNDP):

The primary purpose is to enable implementing partners and contractors including workers to work together to implement and monitor the OHS MS implementation so as to prevent accidents and improve working conditions on site. The PMT is carrying out site inspections through its Third-Party Monitoring Agent at the sites that provides information on implementation status of activities under ECRP that also include safeguards management including OHS.

The following duties concerning OHS management need to be carried out by the PMT including:

- regular monthly IPs meetings to discuss the safety and health programme on site and to make recommendations for improvement, if needed;
- consideration of reports of responsible safety personnel;
- investigate accidents in conjunction with IPs and TPMA to determine their causes and to propose remedies;
- discussion of accident and illness reports in order to make recommendations for prevention;

evaluating improvements made and report to donors.

### Project Implementing Partners (PWP & SFD):

The top management of the implementing partners is ultimately responsible for OH&S and the OH&S management system within their organizations.

The top management shall demonstrate its commitment by: ensuring the availability of resources essential to establish, implement, maintain and improve the OH&S management system; defining roles, allocating responsibilities and accountabilities, and delegating authorities, to facilitate effective OH&S management.

Site specific Environmental Management Plan (EMP) that includes occupational health and safety measures: safety of workers and other persons, noise, maintenance of equipment, prevention of spread of diseases, debris, cleanliness, ease of movement, any social disputes and general appearance of the subproject including tree planting, etc. The EMP shall be filled out by the Supervisor/Site Engineer and attached to the monthly site report.

IPs shall be responsible to develop, implement and monitor Contactors OHS Management procedure under their overall contract management plan.

# Site Engineers/Managers:

Safety and health duties shall be specifically assigned to certain positions such as site engineer (IPs) and site manager (contractors). They shall have experience of safety training on work place safety, security and workers health, and shall have direct access and reporting channel to most senior management level. Some duties which shall be considered are:

- organization and conduct of safety training programmes, including induction training for all workers on the site;
- organization of information to be passed from management to workers, including those of subcontractors;
- provision, construction and maintenance of safety facilities such as access roadways, pedestrian routes, barricades and overhead protection;
- construction and installation of safety signs; testing of lifting machinery such as cranes and goods hoists, and lifting gear such as ropes and shackles;
- inspection and rectification of access and welfare facilities such as scaffolds, ladders, toilets, washing facilities
- Investigation and review of the circumstances and causes of accidents and occupational diseases so as to advise to the senior management on preventive measures; and participation in pre-site planning.

# Site Supervisors:

Good planning and organization at each work site and the assignment of clear responsibility to supervisors are fundamental to safety in construction. "Supervisor" here means the first level of supervision, which on site is variously termed as "foreman", "charge hand", and so on. Each supervisor requires the direct support of site management and shall seek to assure within his or her field of competence that:

- working conditions and equipment are safe;
- workplace safety is regularly inspected;
- workers have been adequately trained for the job they are expected to do;

- workplace safety measures are implemented;
- the best solutions are adopted using available resources and skills;
- necessary personal protective equipment is available and used.

### Workers:

Making the work site safe will require regular inspection and provision of the means for taking remedial measures. The training of workers enables them to recognize the risks involved and how they can overcome them. Workers shall be shown the safe way of getting a job done. Every worker is under a moral, and often also a legal, duty to take the maximum care for his or her own safety and that of fellow workers. The workers shall be involved directly in the following ways of, such as:

- "tool-box briefing", a five- to ten-minute session with the supervisor just prior to starting a task gives the workers and the supervisor a chance to talk about safety problems likely to be encountered and potential solutions to those problems. This activity is simple to implement and it may prevent a serious accident;
- "safety check"; a check by workers that the work environment is safe before starting an operation may allow them to take remedial action to correct an unsafe situation that could later endanger them or another worker.

# 5. OHS management policy, strategy and procedures

The OH&S policy provides an overall sense of direction and serves as the driver for implementing and improving the organization's OH&S management system so that it can maintain and potentially improve its OH&S performance.

The top management shall define and authorize the organization's OH&S policy and ensure that it is communicated and implemented at all levels of organisation and available for external stakeholders and interested parties.

# 5.1 Hazard identification, risk assessment and determining controls

The key hazards associated with construction works currently being undertaken by IPs include but not limited to injuries and diseases due to following-

- Fall from heights
- Slip, trip and falls
- Transportation including traffic injuries
- Material and equipment handling and transfer
- Excavation work
- Others e.g. weather elements, physical exertion, etc.

The IP organizations shall establish, implement and maintain procedures for the ongoing hazard identification, risk assessment, and determination of necessary controls. The World Bank group -General EHS guidelines, provide useful information on Hazards identification and risk assessment method.

The procedures shall include routine and non-routine activities, activities of workers, contractors and visitors, materials and equipment, change in processes and regulations and other requirements, etc.

The organisations shall reduce the risks associated with hazards by applying controls based on their hierarchy. Wherever possible, preventive measures need to be prioritized over other measures e.g. personal protective equipment. It must be ensured that OH&S risks and determined controls are taken into account when establishing, implementing and maintaining its OH&S management system.

# 5.2 Objectives and programs

The IPs shall establish, implement and maintain documented OH&S objectives, at relevant functions and levels within the organization. The example of a key objective may include prevention and management of injuries.

The objectives shall be SMART as far as possible, and consistent with the OH&S policy, shall take into account the legal requirements and other requirements and its OH&S risks. (SMART stands for Specific, Measurable, Actionable, Relevant and Time bound)

The IPs shall establish, implement and maintain programmes for achieving its objectives. Programmes shall include as a minimum: designation of responsibility and authority for achieving objectives at relevant functions and levels of the organization; and the means and time-frame by which the objectives are to be achieved. Example of a program may include Prevention and management of workplace injuries during working at heights / excavation work / transportation etc. The programmes shall be reviewed at regular and planned intervals, and adjusted as necessary, to ensure that the objectives are achieved.

Site specific Environmental Management Plan (EMP) that includes occupational health and safety measures: safety of workers and other persons, noise, maintenance of equipment, prevention of spread of diseases, debris, cleanliness, ease of movement, any social disputes and general appearance of the subproject including tree planting, etc. The EMP shall be filled out by the Supervisor/Site Engineer and attached to the monthly site report.

# 5.3 Contract management for OHS

Since large number of projects are implemented through sub-contractors, it is essential that implementation of OHS elements is in line with other projects across the country, covering various activities and based upon the OHS requirements as specified in the overall OHS framework.

Detailed specifications to ensure occupational safety, security, health and environmental preventive measures shall be cited in contractor agreement documents including both General and Special Contract Conditions.

The contracts for work to include essential OHS aspects provisions for their management such as but not limited to following-

- Responsibilities of the contractor organisation on OHS management
- Organisation and resources allocation including commitment of senior management on OHS

- OHS procedures and protocols based on hazards identification and risk assessment of the specific work including job hazard analysis.
- Decent work conditions and measures for emergency preparedness and response at worksites
- Supervisors trained in monitoring and supervision activities e.g. workplace inspections, incidents reporting and management within a specified timeframe, corrective and preventive actions,
- Provisions for workers insurance covering work related injuries and diseases
- Mechanism for induction training covering basic safety and health at work, job specific training based on specific job hazards, first aid, fire safety and electrical safety aspects.

IPs shall be responsible to monitor the Bill of Quantity (BoQ) for every subproject includes an item for environmental mitigation measures –safety on site such as fencing the site, proper storage of material to facilitate movement, in densely populated areas limitation in use equipment to avoid noise, provide latrines for workers and safety clothing / attire and first aid box.

Orientation programs shall be conducted on OHS hazards and risks and their management by IPs for contracted contractors.

IPs shall take action on non-complying contractors who are found repeatedly causing damages, injuries, and loss of life due to violation of safety compliance rules through notifications, fines, suspension, blacklisting etc

# 6. OHS management elements

# 6.1 Operational controls

The IPs shall determine those operations and activities that are associated with the identified hazard(s) where the implementation of controls is necessary to manage the OH&S risk(s). This shall include the management of change.

For those operations and activities, the IPs shall implement and maintain operational controls-

- as applicable to the organization and its activities e.g. controls related to purchased goods, equipment and services;
- controls related to contractors and other visitors to the workplace;
- documented procedures, to cover situations where their absence could lead to deviations from the OH&S policy and the objectives e.g. permits, authorizations etc.
- stipulated operating criteria where their absence could lead to deviations from the OH&S policy and objectives.

### Safe Work Practices

Safe work practices are generally written methods outlining how to perform a task with minimum risk to people, equipment, materials, environment, and processes.

Safe work practices shall be developed as a result of completing a Hazard Assessment and shall closely reflect the activities most common in the company's type or sector of construction.

All safe work practices should be kept in a location central to the work being performed and readily available to the workforce.

Key hazards and activities for which Safe Work Practices (SWP) are required to be developed include following-

- Ladder safety
- Scaffolding
- Fall protection
- Trenching and excavation
- Housekeeping
- Electrical safety
- Fire safety
- Welding, cutting and burning
- Moving vehicles and equipment

# Safe job procedures

Safe job procedures are a series of specific steps that guide a worker through a task from start to finish in a chronological order. Safe job procedures are designed to reduce the risk by minimizing potential exposure. Safe job procedures are developed by management and workers as a result of a Hazard Assessment, accident investigation and/or as a supplement to a safe work practice. Examples of such procedures include authorization for confined space work, work at heights and excavations etc.

Safe work procedures shall be included in the company's "Worker Orientation" program. All workers shall be aware of the fact that safe job procedures have been established, are in effect.

### 6.2 Competence, training and awareness

To sustain the OHS management by the IPs in their project activities and to monitor the progress on OHS management, it is essential that under the framework, the capacity of implementing organisations is enhanced through procedures and programs for training and awareness on sustained basis.

Based on the assessment of IPs, following key areas for training and capacity building on OHS are identified-

- Capacity building of senior managers and officials on OHS Management aspects
- Capacity building of project OHS managers and supervisors on OHS tools and their application in field.
- Training and awareness of workers including contractual workers on safe and healthy work practices.

The objective of capacity building of senior managers and officials of implementation and monitoring agencies on OHS Management aspects shall be to impart awareness on essential regulatory and other requirements and elements of OHS framework and to make them realise the need and benefits of OHS in construction as undertaken in the current project so as to develop favourable attitude for health and safety at work

The objectives of the training program on capacity building of project level managers and supervisors on OHS tools and their application in field shall be to create awareness on specific OHS hazards and risks and measures for their control as applicable to the project activities and to build their capacity to carry out monitoring and supervision activities in the field through use of OHS tools.

It is essential that the trained manpower shall further carry out training and capacity building in their respective organisations by acting as resource persons for such training.

The IPs shall ensure that persons under its control performing tasks that can impact on OH&S are) competent on the basis of appropriate education, training or experience, and shall retain associated records.

The IPs shall identify training needs associated with its OH&S risks and provide training or take other action to meet these needs, evaluate the effectiveness of the training or action taken, and retain associated records.

The IPs shall establish, implement and maintain procedures to make persons working under its control aware of:

- the OH&S consequences, actual or potential, of their work activities, their behaviour, and the OH&S benefits of improved personal performance;
- their roles and responsibilities and importance in achieving conformity to the OH&S
  policy and procedures and to the requirements of the OH&S management system,
  including emergency preparedness and response requirements;
- the potential consequences of departure from specified procedures.

Training procedures shall take into account differing levels of responsibility, ability, language skills and literacy and risk as exposed by employees at various levels.

# 6.3 Communication, participation and consultation

Communication of OHS information to create awareness and active participation and consultation of workers and other employees is crucial for effective implementation of OHS activities and for sustaining the OHS system for long period.

The IPs shall establish, implement and maintain procedures for internal communication among the various levels and functions of the organization; communication with contractors and other visitors to the workplace; receiving, documenting and responding to relevant communications from external interested parties e.g. communities.

The IPs shall establish, implement and maintain procedures for the participation of worker by their involvement in hazard identification, risk assessments and determination of controls; incident investigation; development and review of OH&S policies and objectives; consultation where there are any changes that affect their OH&S; and their representation on OH&S matters. This may be done through constituting and implementing Safety Committee / Safety

team consisting of equal participation by managers and workers. Workers shall be informed about their participation arrangements, including who is their representative(s) on OH&S matters.

The IPs shall develop consultation with contractors where there are changes that may affect their OH&S risks and their management. The IPs shall ensure that, when appropriate, relevant external interested parties e.g. communities are consulted about relevant OH&S matters.

### 6.4 Documentation

Effective document management is critical for planning, implementation and evaluation of OHS activities as part of the framework for actions on OHS. The documents consist of operational manuals, procedures, instructions, records and reports etc.

The OH&S management system documentation shall include documents covering following key areas-

- the OH&S policy and objectives;
- description of the scope of the OH&S management system;
- description of the main elements of the OH&S management system and their interaction, and reference to related documents;
- documents, including records, determined by the organization to be necessary to ensure the effective planning, operation and control of processes related to the management of its OH&S risks.

The organization OHSMS Manual may contain such information in one place or alternately, operational manual may include section on OHS.

Documents including records, required by the OH&S management system shall be controlled i.e. their availability and communication shall be with concerned officials and employees only. The IPs shall establish, implement and maintain procedures to: approve documents for adequacy prior to issue; review and update as necessary; ensure that changes and the current revision status of documents are identified; ensure that relevant versions of applicable documents are available at points of use;

The IPs shall establish and maintain records as necessary to demonstrate conformity to the requirements of its OH&S management system and the results achieved.

The IPs shall establish, implement and maintain procedures for the identification, storage, protection, retrieval, retention and disposal of records. Records shall be legible, identifiable and traceable.

### 6.5 Emergency preparedness and response

The IPs shall establish, implement and maintain procedures: to identify the potential for emergency situations and to respond to such emergency situations. The IPs shall respond to actual emergency situations and prevent or mitigate associated adverse OH&S consequences. In planning its emergency response, the IPs shall take account of the needs of relevant interested parties, e.g. emergency services and communities near work sites.

The IPs shall also periodically test its procedures to respond to emergency situations, where practicable through conduction of Mock drills etc. The IPs shall periodically review and,

where necessary, revise its emergency preparedness and response procedures, in particular, after periodical testing and after the occurrence of emergency situations.

# 7. OHS Monitoring and evaluation

Monitoring and evaluation are an integral part of OHS management. Systematic monitoring and evaluation require attention to different aspects at all stages of implementation and includes proactive and reactive monitoring. Proactive monitoring involves assessing presence of key elements of systems, procedures and protocols for controls in place. Examples include presence and implementation of OHS policy, hazards identification and risk assessment procedures, emergency response procedures etc. In contrast, reactive monitoring involves monitoring of incidents and accidents. Regular reporting of incidents and accidents and their investigations on day to day continuous basis is essential for learning the lessons to prevent fatalities and serious disabilities.

As part of the framework for actions on OHS, following monitoring aspects need to be addressed.

# 7.1 Performance measurement and monitoring

The IPs shall establish, implement and maintain procedures to monitor and measure OH&S performance on a regular basis. These procedures shall provide for: both qualitative and quantitative measures, proactive and reactive measures of performance.

### Incident investigation

The IPs shall establish, implement and maintain procedures to record, investigate and analyse incidents in order to:

- determine underlying OH&S deficiencies and other factors that might be causing or contributing to the occurrence of incidents;
- identify the need for corrective action; identify opportunities for preventive action;
- identify opportunities for continual improvement; communicate the results of such investigations

The investigations shall be performed in a timely manner. The results of incident investigations shall be documented and maintained.

### Nonconformity, corrective action and preventive action

The IPs shall establish, implement and maintain procedures for dealing with actual and potential nonconformities and for taking corrective action and preventive action. The procedures shall define requirements for identifying and correcting nonconformities and taking actions to mitigate their OH&S consequences;

### 7.2 Internal audit

The IPs shall ensure that internal audits of the OH&S management system are conducted at planned intervals to:

- determine whether the OH&S management system conforms to planned arrangements for OH&S management and has been properly implemented and is maintained; and is effective in meeting the organization's policy and objectives;
- provide information on the results of audits to management.

Audit program(s) shall be planned, established, implemented and maintained by the organization, based on the results of risk assessments of the organization's activities, and the results of previous audits.

Audit procedures shall be established, implemented and maintained that address

- the responsibilities, competencies, and requirements for planning and conducting audits,
- reporting results and retaining associated records; and
- the determination of audit criteria, scope, frequency and methods.
- Selection of auditors and conduct of audits shall ensure objectivity and the impartiality of the audit process.

# 7.3 Key monitoring indicators on OHS

Indicators serve key role to monitor the OHS performance of the implementing organizations. The indicators shall include qualitative indicators as well as quantitative ones. The IPs shall develop their own list of indicators based on their activities. Following list of indicators is recommended for this purpose that may be suitably adapted and expanded by IPs, based on their assessment.

### Qualitative Indicators

The qualitative indicators denote the presence or absence of a mechanism and need to be assessed for their availability with the organizations, their status of implementation and coverage for actions across the organization. Key indicators needed for monitoring OHS in the organization may include following

- Presence and implementation of OHS policy by IPs.
- Establishment of OHS organisation among IPs with clear roles, responsibilities, authority and resources
- Presence and implementation of procedures on hazards identification and risk assessment by IPs
- Identification and monitoring of their compliance for key regulations and other requirements by IPs
- Establishment and implementation of objectives and programs covering project activities by IPs based on HIRA as above in 3.
- Establishment and implementation of Contractors OHS Management Plan by IPs, specially PWP
- Establishment and implementation of training plan by IPs
- Report and follow up of Management Review of OHS by IPs.
- OHS assessment report by Third Party Monitoring Agency on IPs.
- Report of regulatory inspections of IPs by Inspection Agency of Government of Yemen and its follow up

### Quantitative Indicators

The quantitative indicators need to be assessed through collection of data, its compilation for

coverage and expression as percentage of total as statistics or as rates, on periodic basis, preferably on quarterly basis.

Example of some of such indicators include-

- Number of falls from height incidents out of total incidents reported in last three months, as percentage,
- Coverage for actions by IPs of non-conformities identified during last three months etc. as percentage.
- Coverage of training for senior OHS officials, Project managers, supervisors and consultants of IPs.
- Coverage of training plan of IPs for Toolbox Talks and induction training for workers
- Coverage of projects for OHS assessment/ Inspections on periodic basis by IPs
- Non-conformities reported and their corrective and preventive actions by IPs
- Number of Incidents and accidents reports and their management by IPs.

# 7.4 Management Review

To ensure effective implementation of various elements of the OHS management in the IPs, it is essential that a periodic review by top management be undertaken. As part of the implementation of the framework on OHS, Top management of IPs shall review the organization's OH&S management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. Reviews shall include assessing opportunities for improvement and the need for changes to the OH&S management system, including the OH&S policy and OH&S objectives.

Records of the management reviews shall be retained. Relevant outputs from management review shall be made available for communication and consultation with stakeholders. Periodicity for review by senior management shall be determined by the organizations, quarterly frequency being most suitable for initial stages of system development and half yearly, once the system develops and fully implemented.

# 7.5 Toolkit for OHS management framework implementation support

For supporting the effective implementation by IPs, a toolkit of resources has been developed. The toolkit consists of tools such as safe work practices, checklists and questionnaires, guidance notes for OHS management System implementation and formats for reports and records. The tools have been prepared by careful review of best international practices and standards on occupational health and safety and assessment of stakeholders and can be adapted for use by implementing organizations.