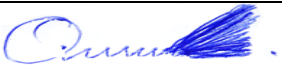




**K.A. KWANSA COMPANY LIMITED**

**PROCEDURE FOR COMMUNICATION, PARTICIPATION AND  
CONSULTATION**

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## 1. Purpose, scope and users

The purpose of this procedure is to define the process of internal and external communication, participation, and consultation regarding policy and effectiveness of the OH&SMS (*Occupational Health & Safety Management System*).

This procedure is applied to all processes of K.A. KWANSA COMPANY LIMITED within the scope of the OH&SMS.

Users of this document are all employees of K.A. KWANSA COMPANY LIMITED inside the scope of the OH&SMS.

## 2. Reference documents

- OHSAS 18007:2007, clause 4.4.3
- OH&S Manual
- OH&S Policy
- Procedure for Document and Record Control
- Procedure for Risk Assessment and Hazard Identification
- Procedure for Preparedness and Emergency Response

## 3. Internal and external communication

Regardless of type of communication, information must be:

- Clear and adequately explained so that K.A. KWANSA COMPANY LIMITED can accurately express its effectiveness
- Traceable
- Comparable

### 3.1. Internal communication

Concerns associated with occupational health and safety issues raised by K.A. KWANSA COMPANY LIMITED employees will be directed to the OH&S Management Representative by the following: [OH&SMS Team member, employee suggestion box, internal e-mail system, and periodic superintendent meetings].

Changes or additions to the OH&S Policy and procedures will be communicated to the affected employees of K.A. KWANSA COMPANY LIMITED by the OH&S Management Representative through e-mail or through meetings.

Inquiries associated with OH&S issues communicated by external parties should be forwarded to the OH&S Management Representative, who is responsible for documenting and processing such information and will notify the top management and take appropriate actions.

OH&S Management Representative will ensure that relevant information is disseminated to ensure the effective communication of issues relating to the OH&SMS. This will be done through monthly e-mail bulletins, newsletters, notice boards, and via the OH&S forum on the Intranet. Methods of internal communication include, but are not limited to: regular management meetings, announcements via notice board, intranet, telephone, newsletters, and conversation with employees about their understanding of the OH&S Policy, OH&S Objectives and Targets, and OH&SMS effectiveness once a month.

### **3.2. External communication**

External communication includes:

- Communication with subcontractors and other visitors
- Communication with external interested parties

OH&S Management Representative is responsible for communication with emergency services and authorities, according to the Procedure for Emergency Preparedness and Response.

#### **3.2.1. Communication with subcontractors and other visitors**

OH&S Management Representative is responsible for communication with subcontractors and other visitors to the work place in accordance with the degree of identified OH&S hazards.

Communication methods used with subcontractors include, but are not limited to:

- Contract
- Traffic signs
- Meeting before execution of work regarding: operational controls, changes that can influence the OH&SMS, legal and other requirements that can influence the method or level of communication, equipment control, incident investigation, possible consequences, and need for additional consultations
- Warning signs and safety barriers
- Evacuation plan and activities when alarm sounds
- Work place access control
- Necessary personal protection equipment (e.g., helmet, goggles, etc.)

In the event of an environmental emergency or major incident, employees are to immediately contact OH&S Management Representative, who will notify appropriate authorities and follow the Procedures for Preparedness and Emergency Response.

During consultation with subcontractors regarding changes that can affect occupational health and safety, OH&S Management Representative must define:

- New hazards or hazards that may be caused by subcontractors
- New or changed controls
- Changes in equipment, materials, and processes
- Changed legislation

- Hazards that affect neighbors or are caused by neighbors

OH&S Management Representative is responsible to communicate the OH&S requirements of K.A. KWANSA COMPANY LIMITED to visitors.

### **3.2.2. *Communication with external interested parties***

OH&S Management Representative is responsible to identify external interested parties and establish communication with them. Communication with external parties includes delivering information, on the organization's initiative, before the event or situation to which it refers (proactive communication) and/or after an event that requires informing interested parties (reactive communication).

OH&S Management Representative is responsible for receiving and recording external announcements into the incoming mail box and delivers them to OH&S Management Representative. Depending on the content of the announcement, OH&S Management Representative prepares a response to the announcement referring to receiving identification of the announcement in order to achieve traceability.

OH&S Management Representative approves the response to external interested parties' announcements. If the announcement represents a trade secret or other classified information, the CEO decides on the method and content of the response.

### **3.3. Participation and consultation with employees about OH&SMS development**

OH&S Management Representative is responsible for informing employees about their participation arrangements in the OH&SMS, including who is their OH&SMS Management representative. The OH&SMS Management representative must ensure employees' participation in:

- Hazard identification and risk assessment
- Incident analysis
- Development and review of OH&S Policy and objectives
- Analysis of potential changes
- Selection of appropriate controls
- Prevention of unsafe behavior
- Recommendations for improvements of OH&SMS performance

OH&S Management Representative must consider obstacles to the participation of employees (e.g., language, education, persons with disabilities, etc.), confidentiality, and privacy.

#### 4. Managing records kept on the basis of this document

Record name	Code	Storage			Responsibility
		Retention time	Location	Protection	
Incoming mail box (electronic form – Excel spreadsheet)		3 years	In the computer of owner of document	Only OH&S Management Representative has the right to make entries into and changes to the incoming mail register.	OH&S Management Representative
Decision on External Communication	PR.07.1	3 year	In the computer of Management representative	Only OH&S Management Representative has the right to make entries into and changes to the document	OH&S Management Representative
Employee Feedback Report	PR.07.2	3 year	In the computer of Management representative	Only OH&S Management Representative has the right to make entries into and changes to the document.	OH&S Management Representative

Only OH&S Management Representative can grant other employees access to the records.

#### 5. Appendices

- Appendix 1 – Record of External Communication
- Appendix 2 – Employee Feedback Report

