

STANDARD GUIDANCE

(COP 21) Health & Safety

A. Definitions and applicability

The aim of **health and safety** initiatives is to prevent accidents and injury to personal wellbeing arising out of, linked with or occurring in the course of work. This is done by minimising, as far as is reasonably practicable, the causes of hazards inherent in the working environment.

A **hazard** is a source of potential harm, injury or detriment.

Personal Protective Equipment (PPE) refers to protective clothing and other garments such as gloves, protective footwear, helmets, goggles and ear plugs, all designed to protect the wearer from exposure to job related occupational hazards.

Source:

- *International Labour Organisation (ILO) Convention 155 - Occupational Safety and Health (1981)*
www.ilo.org/ilolex/cgi-lex/convde.pl?C155
- *Social Accountability International (SAI) - SA[®] 8000 Abridged Guidance: 2008 Standard*
www.sa-intl.org/data/n_0001/resources/live/SAI_AbridgedGuidance_SA8000_2008.pdf

The **Health and Safety** section of the COP is applicable to all Members.

B. Issue background

The safety of work varies enormously between countries, economic sectors and social groups. Every year more than 2 million people globally die from occupational injuries or diseases. Often it is the poorest and least protected, such as women, children and migrants, who are the most affected by unsafe and unhealthy workplaces.

Most countries have legislation relating to employee health and safety. It has become a fundamental responsibility of business to ensure that workers are not harmed as a result of their work. Health and safety management systems and programs are usually designed to cover direct employees, any contract or agency workers, and members of the public (such as visitors and local communities) who may be impacted by a company's operations.

A preventative health and safety culture can deliver substantial productivity benefits. These include reductions in injuries, illnesses and consequently sick days, insurance claims, premiums and regulatory fines, and improvements in staff motivation and performance. By contrast, poor management of health and safety has the potential to undermine reputation and commercial performance. Most importantly, it directly increases the risk of work place injuries, illnesses and fatalities.

Company health and safety programs focus primarily on the prevention of workplace injuries and diseases. However, some businesses are finding it strategic to develop programs for the general health and wellbeing of workers. These businesses are addressing broader aspects of health, such as stress, obesity, fatigue, fitness for work, substance addiction and abuse, and work-life balance.

Specific types of occupational health and safety risks that may be present in the diamond and gold jewellery supply chain are outlined below.

Mining

Mines can be hazardous workplaces. Some of the most common occupational health and safety risks are:

- Exposure to substances, such as dust which can cause silicosis, or hazardous chemicals, such as cyanide and mercury;
- Noise, vibration, heat, poor ventilation, over-exertion and inadequate workspace, particularly in underground operations;
- Exposure to natural elements including extreme heat and cold climates;
- Injuries or deaths due to mine collapse, rock falls or subsidence through instability of excavations or misuse of explosives;
- Risks from working at heights and objects dropped from heights;
- Use of poorly maintained, outdated or otherwise inappropriate equipment;
- Mobile equipment-related accidents, including passenger vehicles and specialised mining vehicles;
- Lack of knowledge or training, particularly among workforces with low levels of general education;
- Vector-borne diseases such as malaria, yellow fever, dengue and others.

Gold Processing and Refining

Gold metal processing and refining may expose workers to risks including:

- Molten metal, electro-magnetic radiation and other high temperature sources;
- Exposure to toxic chemicals including hydrochloric acid and chlorine fumes.
- Exposure to rotating plant and equipment such as pumps, crushers and dryers, and to mobile equipment.

Cutting and polishing

Cutting and polishing risks include dust inhalation, eye strain, poor posture leading to back and shoulder problems, long working hours and accidents with machinery. Specific examples include:

- Lack or misuse of personal protective equipment (PPE): Goggles, rubber gloves, boots, respirators, and dust masks may all be needed at different stages of production;
- Locked emergency exits: Some factories have all their doors, including the emergency exit doors, locked. The main reason is to avoid theft and/or higher insurance premiums. This practice is illegal in most jurisdictions;
- Unsanitary working conditions: In polishing factories, large amounts of dust may be produced. Factories that do not have proper ventilation systems in place risk contributing to serious or fatal respiratory problems;
- Exposure to chemicals: There is often a lack of training on chemical substances and protective measures for workers.

Jewellery Manufacturing

Similar issues are associated with jewellery manufacturing, including PPE and emergency exits, toxic fumes and chemicals (for example, cadmium used in solders for gold manufacture or silica dust from the casting process), eye strain, lack of machinery safety, and unhealthy working conditions.

Trading and retail

General workplace risks apply to this part of the supply chain. These include, for example, slips and trips, manual handling, workstation ergonomics, basic hygiene or transport. More specifically, there are risks from occupational overuse problems such as repetitive strain or eye strain from the handling of products.

C. Key regulations

International standards

The International Labour Organisation (ILO) has more than 70 Conventions and Recommendations dealing with health and safety issues. These cover specific industries, risks that affect a variety of sectors, and preventative or protective measures. ILO Convention 176 (1995), for example, deals with health and safety in mines. Part III provides general recommendations on issues such as handling of chemicals, emergency preparedness, and the right of employees to report accidents to local authorities. Article 8 requires the preparation of an emergency response plan specific to each mine, while ILO Recommendation 183 provides more detail on what these plans should contain. Other general ILO health and safety conventions, such as Conventions 155 (1981) and 187 (2006), lay out standards and recommendations regarding identification of

hazards, education and training, and provision of clothing and personal protective equipment. While these recommendations are usually addressed in government regulation, they may be referred to by companies for additional guidance.

There are also a number of voluntary self-regulatory initiatives such as the International Council on Mining and Metals (ICMM) Sustainability Framework, which has a health and safety component, and the International Cyanide Management Code (addressed in COP 3.2 Hazardous Substances). International finance corporations and major banks have also developed standards that can be used for guidance when developing health and safety programs. Examples of such standards are the World Bank/International Finance Corporation's Environment, Health, and Safety Guidelines and the Equator Principles for project financing.

The international standard OHSAS 18001 Occupational Health and Safety Management Systems (OHSMS), grew from the need for managing safety in the work environment. The standard was created from the British Standard for Occupational Health and Safety Management Systems BS 880, and is similar in its structure to the ISO 9000 (for quality) and ISO 14000 (for environment) series of standards.

National law

Regulation on health and safety issues largely resides at a national or even regional level. It is therefore vital to be aware of local standards, reporting requirements, enforcement processes and potential penalties for non-compliance. Legislative frameworks usually define the roles, responsibility, and rights of authorities, employers, and workers. Many countries have government departments set up specifically to oversee occupational health and safety. These standards and guidelines can assist in the development of in-house programs. Applicable legislation for consumer health and safety may fall under consumer protection, fair trading or nuclear regulation agencies.

Methods of enforcement vary from country to country, as do sanctions for non-compliant employers. In some countries, local law may require rehabilitation and/or compensation for injured workers. Serious accidents at work often incur significant fines or compensation costs and can jeopardize operating licences and other permits. There are usually substantial penalties attached to any criminal conviction. In some jurisdictions, these can include personal criminal liability for the relevant senior managers or directors of a business.

D. Suggested implementation approach

- **COP 21.1: Working conditions:** *Members shall ensure that safe and healthy working conditions are provided for all Employees and on-site Contractors in accordance with Applicable Law and other relevant industry standards.*

Points to consider:

- Health and safety is important for all workplaces, including office environments. Members need to provide:
 - a safe workplace and safe ways of working
 - equipment, tools and machinery in a safe condition
 - safe and hygienic facilities, including toilets, eating areas and first aid
 - information, training and supervision to all workers
 - a process for consultation with workers and to keep workers informed and involved in decisions that may affect their health and safety
 - processes for identifying hazards, assessing risks and controlling risks.
- Members should seek to establish a safety culture in all workplaces.
- Members should establish a written policy on health and safety and display it in common areas in the workplace.
- A senior manager should have responsibility for health and safety at each workplace.
- Procedures should be in place to keep up to date on key legislation related to workplace health and safety, regulatory guidance, compliance issues and procedures, and reporting/record-keeping requirements in all jurisdictions of company operations. See guidance on [Legal Compliance](#).

- **COP 21.2: Workplaces:** Members shall provide and maintain workplaces, and on-site housing where provided, that have:
 - a. safe and accessible potable drinking water;
 - b. sanitary facilities for food consumption and storage;
 - c. clean and hygienic washing and toilet facilities commensurate with the number and gender of staff employed;
 - d. fire safety equipment and alarms;
 - e. clearly marked, unlocked and unblocked emergency exits and escape routes;
 - f. access to adequate power supply and emergency lighting.

Points to consider:

- Facilities should be in compliance with local regulations and building codes.
- Emergency exits must not be locked or impeded (but may be alarmed).
- Ensure that emergency exits are clearly identified and there is back up power available for emergency lighting and signage should main power be interrupted.
- Management should regularly visit workplaces to monitor conditions to confirm conformance with these requirements.

- **COP 21.3: Risks of workplace hazards:** Members shall assess the Risks of workplace Hazards and implement controls to minimise the Risks of accidents and injury to Employees and on-site Contractors. The Risk Assessment shall consider Hazards associated with the Member's activities and products which shall include, where relevant: use of machinery and mobile equipment; storage and handling of chemicals including cleaning materials; exposure to excessive fumes, airborne particles, noise and temperature levels, and/or inadequate lighting and ventilation; repetitive strain activities; considerations for any workers under 18 years of age and expectant mothers; and general hygiene and housekeeping issues.

Points to consider:

- The risk assessment should be appropriate to the business' circumstances and should identify where issues may arise, the likelihood of occurrence and potentially deficient procedures. See the RJC Risk Assessment Toolkit for a general risk assessment template that can be used, particularly for small to medium enterprises. Alternatively Members may use their own risk assessment process.
- A common approach is to identify improvement opportunities to address risks in the following order of priority:
 - *Eliminate* the hazards by removing or modifying the activity from the work process. Examples include substitution with less hazardous chemicals and other hazardous substances, or using different manufacturing processes;
 - *Control* the hazard at the point where it starts. Examples include local exhaust ventilation, isolation rooms, machine guarding or acoustic insulating and noise control;
 - *Minimize* the hazard through design of safe work systems and administrative or institutional measures. Examples include provision of information such as Safety Data Sheets, job rotation, training safe work procedures, workplace monitoring, limiting exposure or work duration, and use of PPE.
- Systems should be in place to ensure improvements identified from the risk assessment are implemented in a timely manner.

- **COP 21.4: Health and Safety committees:** Members shall provide Employees and on-site Contractors with a mechanism, such as a joint Health and Safety committee, by which they can raise and discuss Health and Safety issues with management.

Points to consider:

- The mechanism should allow for discussion to be held on a regular basis and in response to incidents.
- A record of meetings should be maintained, including matters discussed and actions undertaken.
- Workers should be able to raise health and safety issues without fear of criticism or reprisal.
- While on-site Contractors may not be eligible to participate in the committee in some situations, the committee should still function as a mechanism by which they raise health and safety issues.
- Consider informal processes, such as suggestion boxes or team meetings, for consulting workers about health and safety issues or improvements.

- **COP 21.5: Training:** *Members shall provide training and information about Health and Safety to Employees and on-site Contractors in an understandable form and in an appropriate language. This will include:*
 - a. *Specific role-related Health and Safety Hazards and controls;*
 - b. *Appropriate action to take in the event of an accident or emergency;*
 - c. *Appropriate training in fire safety and emergency procedures;*
 - d. *First-aid training to designated Employee representatives;*
 - e. *Employee and Contractor awareness that they have the right and responsibility to stop work or refuse to work in situations that have Uncontrolled Hazards, and to immediately bring these situations to the attention of those at imminent Risk and to management.*

Points to consider:

- Safety training should be part of employee induction to the workplace or when training occurs for use of new types of work or equipment.
 - Tailored training may be delivered to relevant employees depending on specific responsibilities eg designated fire wardens and use of specialised fire fighting equipment.
 - Training should take language and levels of education into account.
 - Monitoring and testing should occur to confirm employees are following procedures correctly. Consider setting targets to encourage employees to follow key procedures.
 - Consider displaying procedures and information for reference in areas where high risk activities are undertaken, using simple signs and symbols where appropriate.
 - Keep records of training undertaken, including participants, and update regularly as required.
- **COP 21.6: Personal Protective Equipment:** *Members shall ensure that appropriate Personal Protective Equipment (PPE) is provided free of charge and verify that it is current, worn and used correctly.*

Points to consider:

- Personal protective equipment (PPE) refers to protective clothing and other garments such as gloves, protective footwear, helmets, goggles and ear plugs, all designed to protect the wearer from exposure to job related occupational hazards.
 - Some businesses may also stipulate special requirements for safe attire in the workplace, for example long sleeves, closed footwear or respirators.
 - The Member must provide information about where and how PPE must be worn, when personal protective equipment must be provided and the standards governing its use.
 - PPE must be appropriate to each individual, properly maintained, clean and hygienic, properly stored to avoid any damage and replaced when expired or damaged.
 - The person using the PPE must be trained in its use and have any limitations of the PPE explained to them.
 - Signs should be posted in the workplace wherever it is necessary to use PPE. These signs serve as a useful reminder to workers of the kind of PPE that should be used.
 - PPE selection processes should include:
 - Detailed evaluation of the risk and performance requirements for the PPE;
 - Consultation with users;
 - Ensuring compatibility of PPE items where more than one type of PPE is required (eg ear muffs with a hard hat);
 - Consideration of workers' medical conditions and fitting requirements;
 - Preference for PPE that complies with recognised standards.
- **COP 21.7: Medical facilities:** *Members shall provide access to adequate on-site Health and medical facilities, including clearly marked first aid provisions and trained first-aid personnel, and have appropriate procedures in place for transportation to local medical facilities in the case of a medical emergency.*

Points to consider:

- All workplaces must as a minimum have first aid provisions and at least one trained first-aid provider, even in low-risk environments that are close to a health clinic or hospital.
- The health and medical facility must be adequate to the workplace, and should take into account the number of workers, the risks of workplace hazards, and proximity and means of transport to clinics or hospitals.
- Consider making educational materials on personal health and wellbeing available to employees.

- **COP 21.8: Emergency procedures:** Members shall establish emergency procedures and evacuation plans for all reasonably foreseeable emergencies, which are accessible or clearly displayed regularly tested (including evacuation drills), and periodically updated.

Points to consider:

- The risk assessment should identify reasonably foreseeable emergencies.
- When developing, implementing and testing emergency procedures, involve and consult with available local emergency response services such as fire departments, medical providers and the police, where available.
- Evacuation plans to respond to these emergencies should be documented and tested.
- Learnings from tests or actual incidents should be used to review and improve emergency procedures.
- Concerns about product theft during emergency drills can be addressed by planning drills in advance and holding them after all product has been secured.
- Evacuation routes and exits should be prominently displayed.
- Emergency exits and evacuation routes must comply with local building codes.

- **COP 21.9: Incident investigation:** Members shall investigate Health and Safety incidents and feed the results into reviews of the controls of related Hazards to identify opportunities for improvement.

Points to consider:

- Incidents should include near-miss situations, where the direct consequences were inconsequential, but the possible consequences could have been serious.
- Investigations should seek to find the underlying or root cause(s) of the incident, not just the last event that may have directly caused in the incident to happen.
- Where available and practicable, use independent personnel and external expertise as part of the investigation team, particularly for significant incidents.
- Ensure the implementation of corrective actions are tracked, and once in place, determine the effectiveness of these actions at preventing a recurrence.
- Larger workplaces should analyse incidents to determine trends.
- Records of workplace incidents may be required under local regulations, or where regulations do not exist, for at least 3 years. Where there is the potential for long latency diseases, such as noise induced hearing loss or occupational cancers, occupational health data may need to be kept for 30 years.

- **COP 21.10: Cobalt-free scaifes:** Members who are engaged in the cutting and polishing of Diamonds shall use cobalt-free Diamond-impregnated scaifes.

Points to consider:

- Inhalation of cobalt-containing dust can have serious health effects.
- Confirm that all Diamond-impregnated scaifes used in cutting and polishing facilities are guaranteed by the supplier to be cobalt-free.

Check:

- ✓ Have you nominated a person to be responsible for health and safety at each workplace?
- ✓ Are you aware of local health and safety laws and regulations?
- ✓ Are workplaces inspected to ensure conformance with the requirements set out in COP 26.2?
- ✓ Have you assessed the risks of workplace Hazards and implemented controls to minimise the risks?
- ✓ Is there a mechanism in place for workers to raise health and safety issues with management?
- ✓ Do employees know what to do in the event of an accident or emergency?
- ✓ Is training provided on role-related hazards and controls?
- ✓ Is appropriate PPE provided, free of charge, and used in accordance with company policy and regulatory requirements?
- ✓ Are there adequate on-site health and medical facilities?
- ✓ Are evacuation plans in place for reasonably foreseeable emergencies, and are the plans displayed and tested?
- ✓ Are procedures in place to conduct investigations of incidents?

Managing Health and Safety for Small Business:

Typical hazards areas for a small business, and ways to address them, include:

1. **Fire** Ensure extinguishers are in place, maintained and clearly marked for type of fire. All fire exits are clear and exit signs illuminated.
2. **Electrical** Plugs, sockets, switches are in good condition. Floors are clear of extension cords, which are tested and tagged where required by Applicable Law. Safety switches are hardwired into electrical switchboards.
3. **Chemical** Workplace chemicals register and Safety Data Sheets (SDS) are current. Chemicals are handled and stored to SDS guidelines, and employees who use chemicals are trained in their safe use.
4. **Slips, trips and falls** Work areas are kept clean, uncluttered and well lit. Employees wear suitable footwear.
5. **Storage and racking** Racking systems are stable and in good condition, and they display and comply with the specified Safe Working Load. Safe access is provided to storage areas.
6. **Noise** Eliminate or reduce noise from loud processes or equipment. Where applicable, hearing protection is available and signage indicates it must be worn.
7. **Heights** Mezzanine floors have safe access and fall protection, handrails are secure and steps are well maintained, platform ladders are industrial grade and comply with standards.
8. **Manual handling** Hazardous manual handling is eliminated. Adequate space is provided for work or storage and trolleys are used to move items. The work area is between knee and shoulder height, and is close to the worker's body.
9. **First aid** A first aid box is readily available and appropriately stocked. Qualified first aid staff are available and known to staff. Sufficient amenities are present for all staff.
10. **Machinery** Safe access to machinery and equipment is provided. Moving parts cannot strike or reach people, and other hazards associated with machinery such as fumes, chemicals and noise have been assessed.

Workplace safety doesn't have to be difficult. You can use the following steps to improve the way health and safety matters in the workplace are managed:

STEP 1 – Applicable Law and Responsibilities

The first place to start is to find out the occupational health and safety laws and regulations that apply to your business. In doing this, become aware of who has a specific responsibility. This can form the basis of your approach to occupational health and safety.

STEP 2 – Plan to work safely

Safety at work involves planning and thinking about what activities happen in your facilities. Doing this can help you identify the tasks and procedures which will control the risks arising from those activities.

STEP 3 – Involve your employees

It is important to consult and talk to Employees and where relevant on-site Contractors and set up ways for them to be involved and contribute to decisions that may affect health and safety in the workplace. For example, raise health and safety issues with staff and display health and safety information in a format that can be easily understood.

STEP 4 – Develop procedures

Develop and implement procedures and processes to manage hazards, implement controls and assess any risks to health and safety with their use.

STEP 5 – Inform and train your Employees

Inform and train Employees and where relevant on-site Contractors about hazards in their job and workplace. Provide employees, particularly those who are new to the workplace or job, with information, training and supervision. Training may vary from simple training checklist to on the job or more formalised training. Use the most appropriate or a combination, based on the nature of the activities, the hazards and the controls.

STEP 6 – Monitor and review

Regularly monitor and review all steps you have taken to manage health and safety. Adjust the controls, procedures and information to address any changes to the law or changes to the activities and materials handled in your premises. Managing health and safety is an ongoing process that should form part of the way you do business. Your processes, operation and staff may change over time and so may the risks. Make sure you continually review your systems to ensure they still provide for the wellbeing of Employees and on-site Contractors and a safe workplace environment.

E. Further information

The following websites have further information on health and safety issues:

- Awareness and Preparedness at the Local Level (APELL) for Mining (2001)
www.unep.fr/scp/publications/details.asp?id=WEB/0055/PA
- Equator Principles
www.equator-principles.com/
- International Council on Mining and Metals (ICMM) - Good Practice in Emergency Preparedness and Response
www.icmm.com/page/1169/library/documents/good-practice-in-emergency-preparedness-and-response
- International Council on Mining and Metals (ICMM) - Sustainable Development Framework – Principle 5 – Seek continual improvement of our health and safety performance
www.icmm.com/our-work/sustainable-development-framework/10-principles#05
- International Council on Mining and Metals (ICMM) - Guidance on Health Risk Assessment (2009)
<http://www.icmm.com/page/14733/new-guidance-on-health-risk-assessment>
- International Finance Corporation (IFC) – Environment, Health, and Safety Guidelines
http://www1.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/ifc+sustainability/sustainability+framework/environmental%2C+health%2C+and+safety+guidelines/ehsguidelines
- International Labour Organisation (ILO) Convention 176 Safety and Health in Mines (1995)
www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C176
- International Labour Organisation (ILO) Convention 155 - Occupational Safety and Health (1981)
www.ilo.org/ilolex/cgi-lex/convde.pl?C155
- International Labour Organisation (ILO) Recommendation 183 - Safety and Health in Mines (1995)
www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:R183
- International Labour Organisation (ILO) Code of Practice on Safety and Health in Opencast Mines
www.ilo.org/wcmsp5/groups/public/@ed_protect/@protrav/@safework/documents/normativeinstrument/wcms_107828.pdf
- International Labour Organisation (ILO) – Occupational Health & Safety
www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/occupational-safety-and-health/lang-en/index.htm
- International Labour Organisation (ILO) - Programme on Safety and Health at Work and the Environment (SafeWork)
www.ilo.org/public/english/protection/safework/
- Mining Association of Canada (MAC) – Crisis Management Planning Guide (2007)
www.mining.ca/www/media_lib/TSM_Documents/TSM_Publications/2007/Crisis_Man_03_2007.pdf
- National Skin Centre - Nickel Allergy
www.nsc.gov.sg/showpage.asp?id=137
- Social Accountability International (SAI) - SA® 8000 Abridged Guidance: 2008 Standard
www.sa-intl.org/data/n_0001/resources/live/SAI_AbridgedGuidance_SA8000_2008.pdf
- U.S. Nuclear Regulatory Commission – Fact Sheet on Irradiated Gemstones
www.nrc.gov/reading-rm/doc-collections/fact-sheets/irradiated-gemstones.html