 أوتوريتي کبڠساءن کسلامتن کصيحتن دان عالم سکيتر

Safety, Health and Environment
National Authority

BUILDING RESILIENCE IN WORKPLACE SAFETY & HEALTH: ADVANCING COMPLIANCE THROUGH THE CODE OF PRACTICE FOR WSH MANAGEMENT SYSTEMS

ZAHARUDDIN HAJI ABD RAHMAN
OFFICER I, COMPLIANCE AND INTERNATIONAL DIVISION

TABLE OF CONTENTS

Safety, Health and Environment
National Authority

© SHENA 2025

www.shena.gov.bn

INTRODUCTION

- A guidance that provides an overview of the **key concepts and principles of safety and health management systems** (14 Elements of Safety and Health Management System as outlined under Schedule 2 of the WSH (General Provisions) Regulations)

- Acts as a practical tool to support organisations in achieving continuous improvements in the WSH performance that are in line with the applicable laws and regulations.

- Intended to be a self-regulatory tool so that workplaces can manage safety and health systematically and effectively.
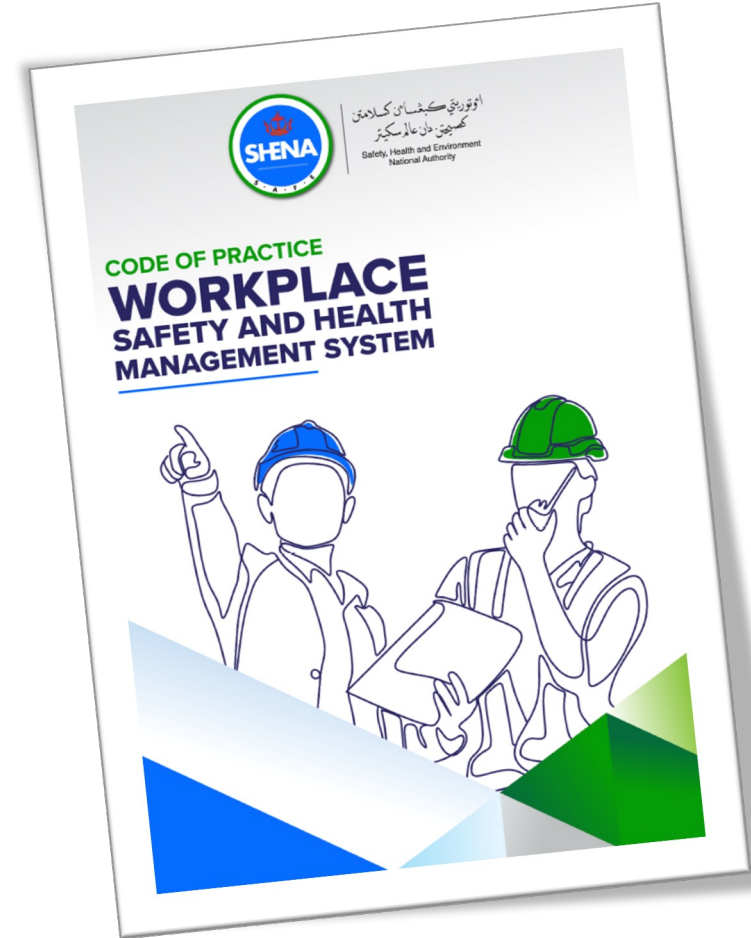
Consultation and participation of workers is crucial for the successful implementation of the WSH management system.

WSH COMMITTEE:

50 WORKERS AND MORE

SAFETY HEALTH MANAGEMENT SYSTEM

COMPANY SPECIFIC

INTERNATIONAL STANDARD

ISO 45001

REGULATORY REQUIREMENT

CHECK / VERIFY BY:

THIRD-PARTY AUDITOR

INTERNAL AUDITOR

© SHENA 2025

www.shena.gov.bn

LEGAL REQUIREMENTS

IMPLEMENTATION OF A WSH MANAGEMENT SYSTEM

- All **worksites**
- Factories engaged in the **processing or manufacture of petroleum, petroleum products, petrochemicals, or petrochemical products**;
- Factories engaged in the **manufacture of semiconductor wafers**; and
- Factories engaged in the **manufacture of fabricated metal products, machinery or equipment, in which 100 or more persons** are employed.

REVIEW WSH MANAGEMENT SYSTEM

- The total contract value of the building operation or work of engineering construction (BOWEC) at a site is **less than $30 million**

AT LEAST ONCE EVERY 6 MONTHS

- WSH (General Provisions) Regulations
- WSH (Construction) Regulations

APPOINT WSH AUDITOR (THIRD PARTY) TO AUDIT THE SHMS

- BOWEC BND 30 million or more
- Factories engaged in the **processing or manufacture of petroleum, petroleum products, petrochemicals, or petrochemical products**;
- Factories engaged in the **manufacture of semiconductor wafers**; and
- Factories engaged in the **manufacture of fabricated metal products, machinery or equipment, in which 100 or more persons** are employed.

IN DRAFT

- Workplace Safety Health Management System & Auditing Regulations

    - *Additional requirement of WSH Auditor.*
    - *Additional workplaces which requires implementation of WSHMS, review of WSHMS and appointment of WSH Auditor (with frequency).*

14 ELEMENTS OF WORKPLACE SAFETY AND HEALTH MANAGEMENT SYSTEM

SHENA
اوتوريتي کبڭساءن کسلامتن کصيحتن دان عالم سکيتر
Safety, Health and Environment National Authority

01 SAFETY POLICY (INCLUDING ALLOCATION & RESPONSIBILITY FOR SAFETY)

02 SAFE WORK PRACTICE

03 HEALTH & SAFETY TRAINING

04 GROUP MEETINGS

05 INCIDENT INVESTIGATION & ANALYSIS

06 IN-HOUSE HEALTH & SAFETY RULES

07 HEALTH & SAFETY PROMOTION

08 CONTROL OF CONTRACTORS

09 SAFETY INSPECTION

10 MAINTENANCE REGIME

11 RISK ASSESSMENT

12 CONTROL OF HAZARDOUS SUBSTANCES

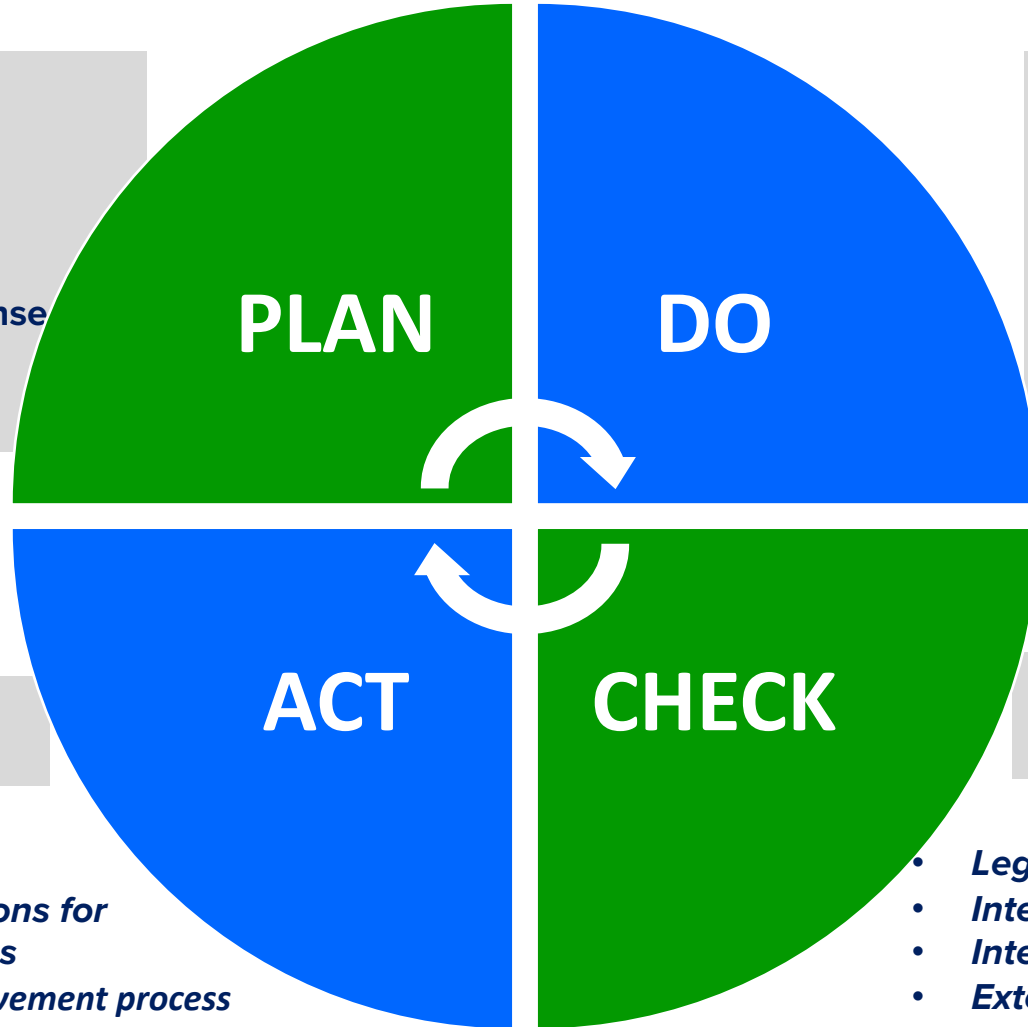**13** OCCUPATIONAL HEALTH PROGRAMMES

14 EMERGENCY PREPAREDNESS

INTEGRATION WITH PDCA CYCLE

PLAN

1. Workplace Safety and Health Policy
2. Risk Assessment
3. Competency, Continuous Education, Training, and Awareness
4. Emergency Preparedness and Response
5. System for Evaluation, Selection, and Control of Contractors

DO

6. Group Meetings
7. Safety and Health Promotion
8. Safe Work Practices and Procedures
9. Maintenance Regime
10. Management of Hazardous Substances
11. Occupational Health Program

CHECK

12. Safety and Health Inspection
13. Incident Investigation and Analysis

- *Legal Requirement Evaluation*
- *Internal Review of WSH Management System*
- *Internal Audit*
- *External Audit*

ACT

14. In-house Safety and Health Rules and Regulations

- *Corrective actions for nonconformities*
- *Continual improvement process*

WORKPLACE SAFETY AND HEALTH POLICY, INCLUDING THE OBJECTIVES, PLAN AND RESPONSIBILITY FOR SAFETY AND HEALTH

Safety, Health and Environment National Authority

SAFETY

- Specific to the organization
- Authorised by the top management of organization
- Consultation with employees and their representative
- Readily available & accessible

COMMUNICATION OF POLICY WITH EVIDENCE

REVIEWED TO ENSURE EFFECTIVENESS & CONTINUING SUITABILITY

KEY PRINCIPLES & OBJECTIVES:

- Commitment on safe & healthy working environment
- Prevention of work-related fatalities, disabilities, injuries, ill health
- Compliance with National WSH legislation
- Elimination of hazard & minimization of risk
- Consultation & active participation of employees

WSH POLICY

WSH OBJECTIVES

WSH ORGANISATION

- To be developed and documented at relevant functions and levels.

- Serves as a target to maintain and continually improve the WSH Management System and WSH Performance.
  - The WSH Plan
    - resources that will be required
    - allocation of personnel responsible
    - target time of completion
    - evaluation of outcome.

- Duties

- Responsibilities – OSH focal point, etc.

- Communication line of relevant roles
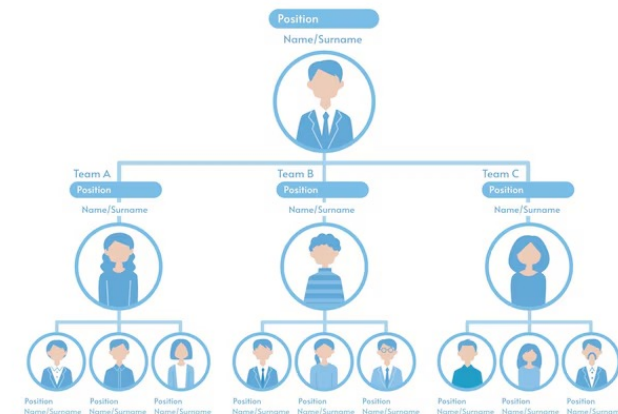
RISK ASSESSMENT

- **Identification and management of the existing and potential hazards** at the workplace.

- **Establish, implement** and **maintain documented processes** for hazard identification and risk assessment, including **methodology and criteria** to assess the risks.

SAFE PLACE
HAZARD SOURCE
ELIMINATION
SUBSTITUTION
ENGINEERING
ADMINISTRATION
PPE
SAFE PERSON
PERSON

RISK
LOW
MODERATE
HIGH
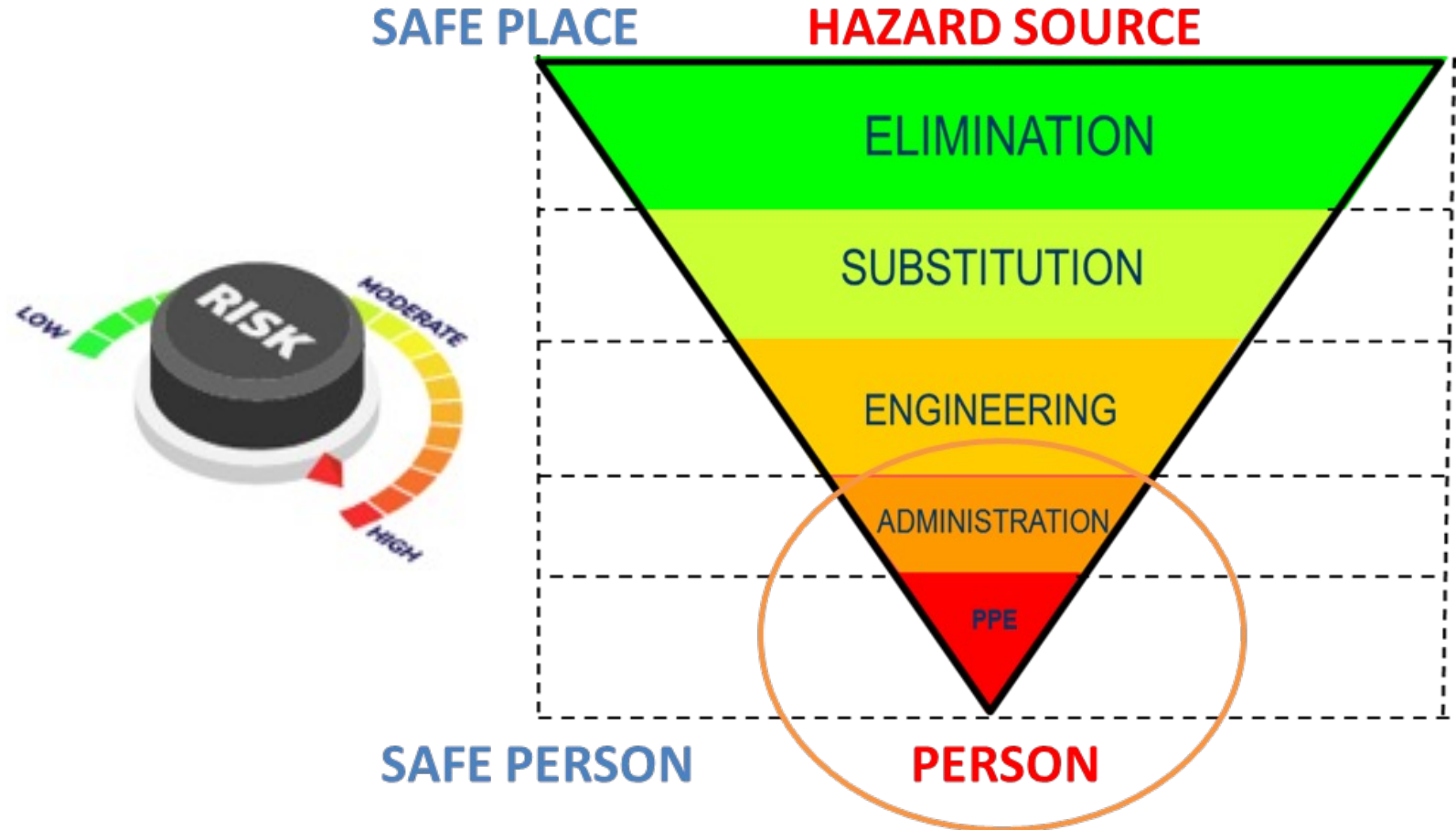
COMPETENCY, CONTINUOUS EDUCATION, TRAINING AND AWARENESS

Purpose:

- To ensure that all employees are **competent** in terms of **qualification, training and work experience** as well as **the ability to identify hazards**.

- Equips all personnel with the required **skills, knowledge, and safety-related information** for the operations, work processes and maintenance of machinery and equipment

- Development of **training matrix** (maintenance & continual improvement):
    - Allocation of resource
    - Legal/ Mandatory training
- Training records are **retained and well-documented.**

- Where applicable, the occupier should also analyse the possibilities to offer **continuous education** and additional qualifications to the employees.

- **Mandatory training requirement by legislation** (i.e. Safety and Health course for supervisors/ workers, Occupational First Aid, Management of Hazardous Substance, Lifting Machine Operator, etc.).

- Training qualification required for **WSH professionals and practitioners** to be competent and registered with Authority (i.e. WSH Officer and WSH Co-Ordinator).

- **Safety and Health induction/ orientation and awareness** training for new employees as well as indirect contract workers which should cover (however not limited to) the organisation:

  - *WSH Policy and WSH Objectives;*
  - *Hazard identification and risks associated within the workplace and industry including ability of employee to remove themselves from work situation that pose imminent and serious danger;*
  - *In-house Safety and Health Rules;*
  - *Safe Working Practices (in reference to 5.2);*
  - *Accident or Incident Reporting Procedures;*
  - *Incident Learning that are relevant; and*
  - *Emergency Response Procedures.*

- **Specific competency skills to safely operate** the plant, machinery, equipment, high-risk/ critical activities, etc.

- Training required to increase the awareness and knowledge of employees to conduct **investigations.**

- **Emergency response training** (i.e. occupational first aiders, fire marshal, rescue at height, etc.).

Necessary skills, training and ability required for a suitable competency assurance system for safety-critical people associated with the facility (including contractors and sub-contractors)

This may involve certification programs and ongoing refresher, re-skilling, and up-skilling training.

EMERGENCY PREPAREDNESS AND RESPONSE

EXAMPLE: FIRE, MEDICAL EMERGENCY, EXPLOSION, FAILURE AND COLLAPSE OF STRUCTURE, FAILURE AND COLLAPSE OF HEAVY MACHINERY AND EQUIPMENT, SPILLAGE OF HAZARDOUS SUBSTANCE, ADVERSE WEATHER AND FLOODING.

- Emergency preparedness plan:
  - Essential information
  - Internal/ external communication
  - Coordination to safeguards all individuals
  - Preparedness and response procedures
  - Evacuation map
  - Emergency responders team appointment
  - First Aid/ Medical assistance
  - Fire-fighting facilities

- Communication & coordination procedures/ flow (documented):
  - With relevant government authorities
  - Neighboring communities
  - Emergency response team
- Emergency equipment
- Emergency drills/ exercise (with proper documentation)

SYSTEM FOR EVALUATION, SELECTION AND CONTROL OF CONTRACTORS

DUTY AS PRINCIPAL (SECTION 14 OF WSH ACT (CHAPTER 277))

- System to evaluate performance of contractors:
  - Competency of contractors
  - Provisions of relevant WSH information/ requirement before commencement
  - Risk assessment

- Monitoring & controlling safety performance:
  - Periodic inspections to ensure compliance
  - Reviewing and verifying safety training records
  - Incident statistics of contractors

- Evaluation, selection and control of contractors"
  - Embedding WSH criteria in selection
  - Develop WSH bridging document "mutual agreement"
  - Effective Communication and Coordination – hazards/ control measures
  - Reporting of incidents/ accidents
  - Relevant WSH hazard awareness/ induction to contractors and their workers prior to work commencement.

DO

6. Group Meetings

7. Safety and Health Promotion

8. Safe Work Practices and Procedures

9. Maintenance Regime

10. Management of Hazardous Substances

11. Occupational Health Program

TO FORMALLY INFORM AND ADDRESS ISSUES AND TAKE APPROPRIATE ACTIONS TO ACHIEVE WSH MANAGEMENT SYSTEM OBJECTIVES

- Involvement and participation of employees in discussion of WSH issues

- WSH Committee meeting (with recorded MOM):
  - Address WSH issues
  - Review incidents
- Other meetings:
  - Site coordination meeting: Ensure work operations are properly coordinated (to eliminate hazard)
  - Toolbox meeting
  - Management safety meeting

SAFETY AND HEALTH PROMOTION

EFFECTIVE MEANS OF COMMUNICATIONS AND PROGRAMME TO PROMOTE WSH AT THE WORKPLACE

- Promotional activities:
  - WSH Information boards
  - In-house WSH Talks/ workshop/ seminar
  - Push for email communication reminders
  - WSH performance/ inspection/ audit outcome
  - Screening of WSH videos.
  - Safety time-out activities (campaign, awards, contest, etc)

- Promotion programmes to promote physical activity and exercise in the workplace
  - Time slots for physical activity
  - Stretching/ office workouts
  - Use of stairs instead of lifts
  - Access to exercise facilities

SAFE WORK PRACTICE AND PROCEDURES

SAFE WORK PRACTICES

- An outline of generalised statements of what shall be or shall not be done to perform the job safely. It also takes into consideration the accepted standard practices within the concerned industry.

SAFE WORK PROCEDURES

- A step-by-step guide to safely perform a task from the beginning to the end. This includes the establishment, implementation and maintenance of procedures for the safe execution of work activities from planning, design and approval, mobilisation, construction and de-mobilisation stages.

- **A documented safe work practice** should be readily available

- **Safe work procedures should be developed and documented** as work procedures, instructions, method statements or permit-to-work systems for all related work activities and processes including the use of plant, machinery, equipment and hand-tools:

    - Work on machinery (especially when fencing/ guarding has been
    - removed for maintenance);
    - Work at height;
    - Work in confined space;
    - Work involving the application of heat or the potential of generation of
    - any source of ignition;
    - Work on process, plant, vessels or machinery liable to produce or give off
    - any corrosive, toxic or flammable substance;
    - Work in a compressed environment;
    - Electrical work;
    - Piling work;
    - Installation of formwork;
    - Crane and lifting operation;
    - High-pressure jetting; and
    - Erection and dismantling of scaffold.

MAINTENANCE REGIME

ORGANISATION SHOULD HAVE A DOCUMENTED INVENTORY AND SYSTEMATIC MAINTENANCE REGIME FOR ITS PLANT, MACHINERY, EQUIPMENT AND HAND TOOLS.

- A maintenance programme (preventive and corrective).
  - Inventory of the plants, machinery, equipment and hand tools;
  - Schedule of inspection and maintenance;
  - Policy/ Procedure for breakdown and repair;
  - Personal Protective Equipment
  - Record of inspection and maintenance
- Set under the manufacturer's recommendations.
- Defects and malfunctions that are identified during inspection shall be recorded and documented.

An effective procedure is required during the breakdown and repair:

- Repairs **carried out by competent persons** and conform to the manufacturer's recommendations;
- To **display warning signs and notices** at respective locations of the plants, machinery, equipment and hand tools;
- **Prohibition on the usage** of the plants, machinery, equipment and hand tools which are under maintenance;
- **Removal of the machinery, equipment or hand tools from the workplace** where it is required; and
- **Certification by a competent person** prior to re-use.

MANAGEMENT OF HAZARDOUS SUBSTANCES

SHALL INCLUDE THE STAGES OF ITS STORAGE, TRANSPORTATION, USE AND DISPOSAL.

- **Procedure for the proper management** of hazardous substances.

- **SDS** available to all persons who are liable to be exposed to the substance.

- Hazardous substances shall be placed under the control of a **competent person.**

- The use of the **Globally Harmonised System (GHS).**

- Hazards associated with the hazardous substances should be **communicated** accordingly to users

Design proper and secured storage areas for the hazardous substances

Permissible Exposure Level (PEL)

Procedures for the disposal of hazardous substances

Health surveillance

Emergency response procedures for medical and spill incidents.

OCCUPATIONAL HEALTH PROGRAMME

TO PROTECT WORKERS FROM VARIOUS OCCUPATIONAL HEALTH HAZARDS SUCH AS FATIGUE, NOISE, HAZARDOUS SUBSTANCES, RADIATION AND EXCESSIVE HEAT.

- Plan and implement an **occupational health programme** which typically involves a combination of policies, procedures and initiatives that are aimed at protecting the physical and mental health of workers.

- **Health risk assessment.**

- Engage a **competent person** to monitor, test or assess the environment of any workplace for potential health hazards at sufficient intervals for workplaces in which toxic substances are manufactured, handled, used or given off.

- Hearing conservation programme;

- Respiratory protection programme;

- Ergonomics programme;

- Mental health at work awareness programme;

- Heat stress management programme;

- Infection control programme; and

- Health/ Medical surveillance programme (including medical examination requirement for specific personnel involved in hazardous occupation).

CHECK

12. Safety and Health Inspection

13. Incident Investigation and Analysis

- Legal Requirement Evaluation
- Internal Review of WSH Management System
- Internal Audit
- External Audit

SAFETY AND HEALTH INSPECTION

AIM TO VERIFY THE WSH PROVISIONS AND IMPLEMENTATION WHICH CONFORM TO RELEVANT STATUTORY REQUIREMENTS AND WSH REGULATIONS.

- **Establish and maintain documented procedures** for WSH inspections at such intervals which is reasonably practicable to **identify any unsafe practices and conditions at the workplace** and **implement corrective actions**.

- Should include the following:
  - Routine inspection;
  - WSH Committee inspection;
  - Plant, machinery, equipment, and hand tools inspection;
  - Inspection arising from the occurrence of an incident(s);
  - Inspection arising from risk assessment;
  - Inspection of specialised operation and equipment; and
  - Other specified inspections as required by the authorities.

- Planned accordingly with a **suitable checklist** to facilitate the efficiency and consistency of its deliverables.

- Result of the inspection should be **recorded, reported and communicated** to the person responsible.

- Procedures to implement the corrective actions from the inspection should be developed and include the following:
  - Investigation of the contributing factors leading to unsafe practices and/or conditions;
  - Determination of actions required to eliminate the contributing factors of non-conformities;
  - Effective control measures (with a target timeline) in dealing with corrective actions; and
  - Monitoring the progress of corrective actions to ensure its sustainability.

ESTABLISH, IMPLEMENT AND MAINTAIN DOCUMENTED PROCEDURES TO NOTIFY, REPORT, INVESTIGATE, RECORD, ANALYSE AND RECORD-KEEPING OF ALL WORKPLACE RELATED INCIDENTS.

- Investigation procedures may include (but are not limited to):
  - Procedure of notification and reporting to SHENA;
  - Types of incidents to be investigated;
  - Prompt notification/reporting of incidents to designated persons/ authorities;
  - Identification of immediate causes, underlying factors and root causes;
  - Recommendation and implementation of follow-up actions;
  - Review of the effectiveness of corrective actions; and
  - Review of risk assessment for the affected work process.

- Investigations should be carried out by **competent persons, with appropriate participation from employees and their representatives**.
- The outcome of the investigations and any recommendation should be addressed and communicated to the relevant parties involved including:

  - *The need for corrective action(s);*
  - *The implementation of corrective action, which prevents incidents from recurring;*
  - *Analysis, trend and statistical comparison; and*
 - *Lesson learnt and sharing from the investigations.*

EVALUATION OF ORGANIZATIONAL PERFORMANCE FOR CONTINUOUS IMPROVEMENTS

EVALUATION AGAINST LEGAL REQUIREMENT

- Availability of a legal requirements register
- Determine and evaluate up-to-date local WSH legal requirements
- Integration with other management system

INTERNAL REVIEW OF WSHMS

- To verify that the WSHMS is **appropriate, sufficient, and efficient.**
- **Shall include:**
  - WSH Policies;
  - WSH targets and objectives performance status;
  - WSH plan and objectives;
  - Root causes from the incident investigation;
  - Follow-up items from the previous review; and
  - New legal or other regulatory requirements as set by the country.
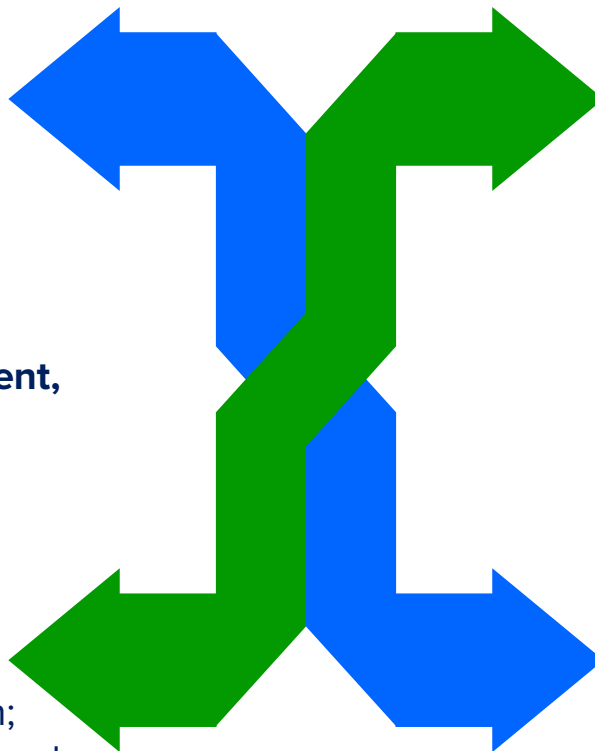
INTERNAL AUDIT

- to **verify** whether the safety and health activities and programmes **comply with the WSHMS.**
- Personnel conducting the audit should be competent and independent of the areas being audited.

EXTERNAL AUDIT

- A comprehensive assessment that is conducted by a **third-party auditor** who is not affiliated with the organisation being audited.
- A qualified Workplace Safety Health Auditor (registered with SHENA) shall be engaged and appointed.
- Workplace to implement, as far as is reasonably practicable, the recommendations of the WSH Auditor appointed without undue delay.

14. In-house Safety and Health Rules and Regulations

ACT

- *Corrective actions for nonconformities*
- *Continual improvement process*

IN-HOUSE SAFETY AND HEALTH RULES AND REGULATIONS

WRITTEN SAFETY RULES AND REGULATIONS THAT ARE SPECIFICALLY RELEVANT TO WORKPLACE BUSINESS AND OPERATIONS TO PROVIDE INSTRUCTION FOR ACHIEVING SAFETY MANAGEMENT OBJECTIVES

Examples:

- Good general housekeeping including clear passageways;
- Provision, use and maintenance of personal protective equipment requirement at certain areas in the workplace;
- Use, storage and disposal of hazardous substances;
- Safety signage and colour coding systems;
- Intervention/ reporting of hazards and incidents;
- Evacuation plan;
- Traffic management plan;
- Use of handrails;
- Safe handling and movement of materials;
- Smoking rules; and
- Provision of designated rest areas and rest breaks.

Communication

- **a review process** in place to update the in-house safety rules and regulations when required which can be embedded as part of the outcome of corrective action

CORRECTIVE ACTIONS AND CONTINUAL IMPROVEMENT

- Identification of WSH opportunities.

- Corrective actions for nonconformities – **to prevent recurrence with reasonable timeline.**

- A continual improvement and ongoing process:
    - Review the WSH policy.
    - Foster an open WSH culture with active participation from workers and management.
    - Sharing and communicating information/ feedback with workers.
    - Maintain and retain all documented information and relevant records

SUMMARY OF EVIDENCE REQUIRED FOR THE COMPLIANCE OF THE CODE OF PRACTICE: WORKPLACE SAFETY AND HEALTH MANAGEMENT SYSTEM

Checklist : Evidence required for Compliance of COP

NO.	EVIDENCE	YES	NO	N/A	REMARKS
1	**WORKPLACE SAFETY AND HEALTH POLICY, INCLUDING THE ALLOCATION AND RESPONSIBILITY FOR SAFETY AND HEALTH**				
	a) Availability of documented WSH Policy.				
	b) Accessibility and communication of WSH Policy with the following criteria: • Available and accessible as documented information; and • Documented evidence to show it has been effectively communicated within the organisation;				
	c) Availability of documented WSH Objectives (consistent with WSH Policy) which include: • Title of the Objective/ Target; • Resources required; • Responsible person;				

The criteria for approval as Workplace Safety and Health Auditor shall be, but not limited to the following:

i.   Employed in Brunei Darussalam.
ii.   Have passed internal assessment interview with SHENA.
iii.   Have the required working and practical experience based on the following:
   a.   Holds a relevant degree with at least five (5) years of working experience in workplace safety and health-related field OR
   b.   Do not hold a relevant degree, required at least eight (8) years of working experience in workplace safety and health-related field.
iv.   Minimum qualification – NEBOSH International Diploma in Occupational Health & Safety or equivalent.
v.   Attended and passed ISO45001:2018 Lead Auditor Course [Chartered Quality Institute (CQI) / International Register of Certificated Auditor (IRCA) Certified Course].
vi.   Attended Brunei Darussalam Workplace Safety & Health Act Cap. 277 Training Course and passed the examination with SHENA.
vii.   Have at least two (2) years of working experience in auditing/ consultancy-related activities (e.g. Occupational Health and Safety and/or Quality Management System and/or Environmental Management System audits).

Note:
Relevant degree refers to any degree in engineering, physics, chemistry, environmental studies, occupational safety & health and other acceptable degree by the authority.

CONCLUSION

SHMS serves to deliberate, structured, and continuous effort grounded in **compliance, leadership, and worker participation**.

A practical framework that helps organisations **systematically manage risks, meet legal obligations**, and more importantly, **foster a culture of prevention and accountability**.

Embracing the Plan-Do-Check-Act cycle, we can move beyond basic compliance — and toward a truly resilient and proactive safety culture.

THANK YOU