

# Corrective and Preventative Action Systems

## I PURPOSE

To ensure that corrective actions designed to correct hazards and other HSLP or ESR issues are properly implemented and effective. These corrective actions may be derived from a variety of sources including investigations, inspections, audits, HSLP, ESR, and L&D committee meetings, observations, industrial hygiene monitoring results, MSHA inspections, environmental assessments, social evaluations, etc, and are typically intended to be preventive in nature.

## 2 SCOPE

This procedure applies to all functional areas, operations, offices, including employees, vendors, visitors and contractors within the scope of the Integrated Management System (IMS).

## 3 DEFINITIONS AND ACRONYMS

### Definitions

**Consequence** is the outcome/impact of risk events.

**Corrective Action** is an action prescribed to correct a substandard condition, act, event, or its potential.

**Corrective Actions Register** is a database used to record and track the completion of corrective actions.

**Key Performance Indicators** are metrics used to measure the effectiveness of the HSLP Program in the operating areas. Example: One KPI is a score on CAR indicating the completion rate for corrective actions in each area.

**Likelihood** is a measure of the probability and/or frequency of a risk event occurring.

**Hazard** is the inherent characteristic of a material, condition, or activity that has the potential to cause harm to people, property, the environment or the COMPANY's reputation.

**Preventive Action** is a Corrective Action assigned to a condition, act, event, or its potential, designed to prevent their occurrence or reoccurrence. These actions tend to be long term in nature.

**Risk** is the possibility of economic or financial loss, harm to people, processes, property, and the environment, relations with stakeholders or to reputation. Risk has two elements – the likelihood or probability of something happening, and the consequences or impacts if it does.

**Risk Assessment** is the calculation and allocation of priorities to risks for their subsequent management or treatment.

**Site** refers to any COMPANY designated location (operational areas, offices, etc.).

## Acronyms

<b>CAR</b>	Corrective Actions Register
<b>ESR</b>	Environmental and Social Responsibility
<b>HMR</b>	HSLP Management Representative
<b>HSLP</b>	Health, Safety and Loss Prevention
<b>IMS</b>	Integrated Management System
<b>KPI</b>	Key Performance Indicator
<b>L&amp;D</b>	Learning and Development

## 4 ROLES AND RESPONSIBILITIES

### Document Owner

HMR

### Responsible Roles and Position-Holders

**Contractors/Vendors** are businesses performing a service for the COMPANY. They are responsible for ensuring their employees working on COMPANY sites understand and comply with the requirements as outlined in this procedure.

**Employees and Contracted Employees** are all employees in any position whether COMPANY or contracted employees working on any COMPANY site. They are responsible for complying with the requirements as outlined in this procedure.

**Visitors** are anyone not employed by the COMPANY in any capacity but are traveling or touring on a COMPANY site. They are responsible for complying with the requirements as outlined in this procedure.

**HSLP /Environmental** is any COMPANY employee working under and including the Regional Director of HSLP/Environmental. They are responsible for periodically auditing for compliance to this procedure.

**A Supervisor/Foreman or Designee** can be a COMPANY employee or a contractor/vendor working or traveling on any COMPANY site. They are responsible for enforcement of all requirements, rules, and established guidelines as outlined in this procedure.

## 5 DIRECTION

All employees, vendors, contractors, and visitors traveling/working on site shall comply with and ensure personnel accountable to them comply with the following requirements of this procedure.

### Supervisor/Foreman or Designee

- Shall identify risks and hazards and concerns in their area of responsibility, through Inspections, Task Observations, group meetings, Investigation, etc. and promptly assign a person responsible for implementing the corrective action and the date for completion of the action.

- Shall inform the person responsible for the corrective action of the completion date and the requirements by the end of shift.
- Corrective actions requirements and completion dates shall be submitted to area HSLP/ESR representative within 48 hours.
- Complete the corrective action as per commitments made and monitor its effectiveness.

#### **General Supervisor/ General Foreman**

- Review CAR reports provided to them by HSLP/ESR and COMPANY reports or action items, then take appropriate actions designed to implement the corrective actions within the established dates.
- Hazards and deficiencies you are personally accountable for, promptly assign a corrective action and date for completion of the action.
- Provide this corrective action and completion date to your HSLP/ESR representative within 48 hours for CAR corrective actions. Enter information for corrective actions and completion dates in the computer software.
- Complete the corrective action as per commitments made and monitor its effectiveness.

#### **HSLP/Environmental Business Assistant**

- Enter corrective action data into the CAR or COMPANY database upon receipt.
- The CAR register will assign a document number once the required information (Date, Operating Site, and Functional Area) is entered into the system from a series of drop-down lists.
- Select the check-box labeled "Preventive Actions" in CAR, or choose "Preventative" from the Action Type for those Corrective Actions that are indicated as preventive in nature.
- Generate CAR reports for area management at the request of your department management.

#### **HSLP / Environmental / External Affairs Representatives**

- Ensure that corrective actions are promptly provided to your HSLP/ESR business assistant for entry into the CAR system within 48 hours from receipt.
- Generate CAR reports for area management at the request of your department management.
- Should verify that corrective actions are completed in accordance with the established deadlines and that they are effective, through audits and according to area needs/ requests.
- Review the CAR compliance percentages with your Department management at least monthly.
- Ensure that CAR scores are completed in a timely manner and included as part of the monthly KPI score for HSLP.

- Ensure that every entry code into CAR is also in the corresponding physical file.
- Ensure that every entry into CAR is properly coded as to its event type.

### **Manager**

- Review CAR reports provided to you by your HSLP/ESR representative and other reports or action items. Then take appropriate actions as indicated by the reports to insure that the corrective actions are properly implemented.
- Review CAR reports with your staff at regularly scheduled staff meetings.
- For hazards you are personally accountable for promptly assign a corrective action and date for completion of the action.
- Provide this corrective action and completion date to your HSLP/ESR representative within 48 hours for CAR items.
- Randomly review corrective action for completion and effectiveness.)
- Be personally responsible for completing corrective actions as a result of actual major and high potential accidents and incidents, S&S citations from MSHA, and Catastrophic/Extreme risks identified from Risk Analyses.

### **Superintendents**

- Review CAR reports provided to you by your HSLP/ESR representative and other reports or action items. Then take appropriate actions as indicated in the reports to insure that the corrective actions are properly implemented.
- Review CAR reports with your staff at regularly scheduled staff meetings.
- For hazards you are personally accountable for, promptly assign a corrective action and date for completion of the action.
- Provide this corrective action and completion date to your HSLP/ESR representative within 48 hours for CAR items.
- Ensure completion and effectiveness of corrective actions throughout area of responsibility.

### **General Guidelines**

- Once hazards and issues from a source are identified, corrective actions will be established which should be preventive in nature and the person responsible for correcting the hazard will be assigned specific activities for correcting. The issue will be defined and estimated completion dates for the activity will be established and recorded.
- This information will be provided promptly to your HSLP/ESR Representative within 48 hours for CAR items.
- Once corrected, the information will be provided to your HSLP/ESR Representative for entry into the CAR system.
- When dealing with a physical hazard which presents an imminently dangerous to life

and health situation that cannot be immediately corrected without endangering persons, property or the environment, the following steps shall be followed:

- Secure the area
- Remove all people at risk..
- Provide the person or persons responsible for correcting the hazard with necessary physical safeguards, e.g. tapes, signs, barricades, etc.
- All items identified will be entered into the departments CAR.
- After the notification that the corrective action has been implemented, the area superintendent shall monitor the effectiveness of the correction to assure that it has been corrected properly.
- CAR reports will be provided to Area Managers monthly by your HSLP/ESR Representative, and are to be reviewed at monthly meetings.
- Area Managers have the responsibility to distribute those reports within their Departments to ensure the information is reviewed and corrective actions taken.
- HSLP Representatives will ensure that CAR compliance scores are used in the monthly KPI calculations.

### **Risk Ratings and the CAR (Corrective Action) Process**

- 3, 2, or 1 point has been assigned to each entry into CAR. These points indicate the relative importance of this activity for preventing harm, and are based on probability and consequence of loss factors for entri.
- If something is changing please refer to Change Management.
- Points for other activities are assigned based on relative importance of the general activity. e.g. safety committee activities, safety meetings, 3 W's etc.
- Points as indicated in the CAR are assigned as follows:
  - Accident Investigations extreme and high potential or actual loss (3)
  - Accident Investigations moderate potential or actual loss (2)
  - Accident Investigations low potential or actual loss (1)
  - Incident Investigations extreme and high potential(3)
  - Incident Investigations moderate potential (2)
  - Incident Investigations low potential (1)
  - Inspections A hazard (3)
  - Inspection B hazard (2)
  - Inspections C hazard (1)
  - Risk Assessments Extreme Risks(3)
  - Risk Assessments High Risk(2)
  - Risk Assessments other risks (1)

- Observations, Tasks (2)
- Industrial Hygiene Sample > IDLH (3)
- Industrial Hygiene Sample > STEL (2)
- Industrial Hygiene Sample > TLV (1)
- Emergency Equipment Inspection (2)
- Emergencies (2)
- Emergency drills (2)
- Safety Committees (2)
- MSHA Inspections S&S (3)
- MSHA Inspections non S & S (2)
- Audits Environmental (2)
- Audits Other (2)
- Safety Talks (2)
- 3W (1)
- Other (1)