Quality, Health Safety &
Environment Code

Quality, Health Safety & Environment Code:2024

Preface

This **Quality, Health Safety & Environment Code** (**QHSE Code**) was developed by TQCS International Pty Ltd (TQCSI). TQCSI is accredited by the Joint Accreditation System of Australia and New Zealand (JASANZ) as a certification body for auditing and certifying organisations to management systems based on various international standards.

This Code is intended to be used as a guide for organisations who are implementing a management system to address quality, workplace safety and/or environmental issues. The Code is not intended as a replacement for ISO 9001 (quality management), ISO 45001 (WHS/OHS management) or ISO 14001 (environmental management). Rather, it is based on those international standards and is designed to fill a void for those smaller organisations who wish to meet pre-qualification requirements but have no current requirement for certification to the international standards or who do not have the resources to implement them. However, as organisations grow, the Code is designed for relevant management systems to be easily developed to meet the requirements of the international standards.

The **QHSE Code** may be used to certify QHSE, HSE and SHE management systems, and any other form of management system used to demonstrate compliance against quality, workplace safety and environmental principles.

This **QHSE Code** has been specifically prepared for smaller organisations in response to a demand by governments and major customers to manage operational control, workplace safety and pollution control. Organisations who are certified against the **QHSE Code** can demonstrate to their customers an ability to identify, analyse and manage quality, workplace safety and environmental impacts under a management system which is audited and certified by an independent, third-party certification body. Importantly, they also demonstrate the ability to reliably work with larger organisations who have achieved certification against the international standards. Appropriately certified organisations may exhibit the **TQCSI QHSE Code** certification mark.

The Code itself is represented by the bold type contained herein. To assist in its interpretation, explanations of the relevance of each clause have been included in italics.

Contents

1   Scope

This Quality, Health Safety & Environment (QHSE) Code specifies management system requirements for use by organisations to provide objective evidence of their capability to meet contractual and legislative requirements relevant to quality, workplace safety and environmental requirements. It aims to provide a framework for a reliable and practical management system, tailored for smaller organisations who supply larger organisations certified to the relevant ISO Standards or wishing to improve their own operations through the adoption of a management system.

The Code is aimed at achieving internal efficiencies and customer satisfaction while maintaining workplace safety and protecting the environment. It relies on management identifying and documenting its own processes and encouraging continual improvement. Accordingly, organisations should document procedures in a manual to address each clause of this Code.

2   References

This Code refers to the ISO 9001 (quality management), ISO 45001 (OHS management) and ISO 14001 (environmental management) Standards.

3   Definitions

For the purposes of this Code, the following definitions apply:

- **Consequence - outcome of an occurrence effecting an objective**

- **Contract: tender/contract, project, purchase order or any other form of request for work to be carried out**

- **Corrective action - action to eliminate the cause of a nonconformance and to prevent recurrence**

- **Interested party - person or organisation that can affect, be affected by or perceive themselves to be affected by a decision or activity**

- **Likelihood - chance of something happening**

- **Nonconformance - non-fulfilment of a requirement**

- **Objective - result to be achieved**

- **OHS: term used to reference occupational health and safety, work health & safety (WHS), workplace safety or 'health & safety'**

- **Organisation - company or organisation for which the management system applies**

- **Procedure - a procedure, SOP, work instruction or other document used to direct employees in the conduct of an activity**

- **Project: contract or assigned task which may be based in a new location**

- **Risk - effect of uncertainty on objectives**

- **Residual risk - risk remaining after risk treatment**

- **Senior Manager - owner or most senior manager in the organisation**

- **Target: one or more actions required to achieve an objective.**

4   Management System

4.1   Scope of Management System

The organisation is to clearly document the activities and locations included in the scope of the management system.

Explanation: The management system must apply to all activities and areas where work is undertaken, including temporary or construction sites if relevant. This scope of the management system is to be documented.

4.2   Management System Requirements

The organisation is to establish, implement, maintain and continually improve a documented quality, health safety & environment management system to meet the requirements of this Code.

Explanation: A manual or set of procedures is required describing how the organisation meets the requirements of each clause of this Code. It need not be a voluminous document but must describe the roles and responsibilities of management and employees and how the various tasks required of this Code are to be undertaken. Once documented, the quality, health safety & environment management system must be implemented through training of employees and implementation of relevant record keeping.

Management systems do not stop once certification is achieved and, similarly, the quality, health safety & environment management system must be maintained so that it continually improves, and relevant quality, health safety & environmental objectives are achieved.

5   Leadership

5.1   Policy Statement

The Senior Manager is to define the organisation's commitment in the form of a Policy Statement (or individual policy statements) which is relevant to the organisation's goals, customer needs and expectations, and addresses quality, workplace safety and environmental issues. The Policy (or policies) must be documented, available to the public upon request and understood by employees.

It is the responsibility of management and employees alike to approach their tasks with a

standard of care that matches the duties of care and obligations imposed at law to ensure immediate and ongoing attention to quality of performance, workplace safety of all persons on site and care for the environment.

Explanation: Fundamentally, all important aspects of management control which could affect the quality of work and legal responsibilities regarding workplace safety and the environment should be documented and continually improve. Therefore, it is the responsibility of the Senior Manager to document a policy that can be interpreted by employees as the organisation's formal commitment to the management system that has been developed.

The Policy (or individual policies) should refer to the organisation's overall, aspirational objectives for quality, workplace safety and environmental issues. It should express commitment to compliance with legal and regulatory requirements, understanding of the needs and expectations of customers, and commitment to continual improvement. The organisation should ensure that the Policy, once developed, is understood by all employees. The Policy should be available to the public through means such as tenders, websites and promotional literature.

The responsibility for ensuring that a job is completed competently, with due regard to workplace safety of every person that may be affected by the job and with due respect for the environment, including pollution control, should be addressed by management and understood by all employees.

5.2   Responsibilities

The organisational structure is to be described, particularly identifying who has functional responsibility for quality, workplace safety and environmental duties, and the interrelation and reporting lines between management and employees.

Sufficient resources are to be allocated by the Senior Manager to ensure the management system can operate effectively.

Explanation: Employees are often uncertain of their particular responsibilities within an organisation or on a project. It is therefore necessary to develop an organisational structure showing the relative responsibilities and, in particular, nominating those with specific quality, workplace safety and environmental responsibilities for the management system.

Statutory responsibilities are normally to be identified and documented on a 'project by project' basis.

A brief description of each person's duties, responsibilities and authorities in the form of a job description is recommended but not mandatory if it can be achieved by other means.

The organisation must ensure sufficient resources, particularly in terms of time, are allowed for the management system to be effectively managed.

6   Planning

6.1   Legal Requirements

The organisation is to ensure it retains a sound understanding of relevant federal, state and local government legislation and regulations, and any industry codes of practice or other requirements regarding workplace safety and the environment. The organisation is to ensure current legislation, regulations and other documented requirements of the organisation are readily available, including customer requirements or specifications.

Requirements for licences, permits and qualifications for special work are to be documented.

Explanation: The method the organisation uses to have access to and be notified of legislative or regulatory changes to workplace safety or environmental issues must be demonstrated.

The organisation is to ensure that the requirements under these regulations are met and demonstrated in the management system.

Where high risk work permits or licences are required, the organisation is to ensure a sound process is in place to ensure workplace safety.

6.2   Risk Assessment

The organisation is to assess the risk of all potential workplace safety and environmental hazards and impacts of sites, equipment and processes. This is to include sites where the organisation is located and any temporary sites where work is conducted, any equipment that could harm a user and all significant operational processes/activities.

Any potential hazard or risk identified during normal operations is also to be assessed.

Once assessed, all workplace safety and environmental risks are to be controlled such that the risk is reduced. Controls for safety hazards and risks should be selected based on the following hierarchy of controls:

- **eliminate the hazard**

- **substitute with less hazardous processes, operations, materials or equipment**

- **use engineering controls and reorganization of work**

- **use administrative controls, including training**

- **use adequate personal protective equipment.**

All relevant employees are to be appropriately trained to deal with those risks and their controls.

The organisation is to ensure all new sites, equipment and processes are also assessed for their risk.

The risk assessment process is to be documented, and records of risk assessment are to be retained.

Explanation: All sites where work is undertaken are to be assessed for their risk relevant to workplace safety and the environment. For temporary work sites, the risk assessment must be undertaken prior to commencing any work so that any required controls are implemented before risking the safety of employees.

Similarly, all equipment which could cause harm to a user and processes or activities undertaken by the organisation must be risk assessed. This will often result in a procedure or 'Safe Operating Procedure' to be followed by employees using respective equipment or a 'Safe Work Method Statement', or similar, to record the controls for respective processes or activities. Principal contractors will often require copies of these documents to verify that potential hazards are known and controlled.

The risk assessment process is to be documented and is to be based on considering the potential of the risk occurring against the possible severity of the impact. The resultant priority will assist in determining what type of control is required.

Similarly, any potential hazard identified during normal operations is to be assessed in the same manner.

Controls are then to be implemented to prevent the hazard or impact causing harm. The resultant risk must be less than the original risk score. Respective employees are to be trained in the controls implemented.

The five-level Hierarchy of Controls described above is to be used to determine the controls selected unless local regulations require otherwise. Elimination of the hazard or risk is always the first consideration.

Any new site (including temporary work sites), new equipment that is acquired and new processes or operational activities that are adopted, are to be risk assessed in the same manner as discussed above. Appropriate controls are to be implemented to prevent workplace safety or environmental harm.

Records of the risk assessment and controls implemented are to be retained on file, often called a Hazards or Risks Register. These records are to be updated when incidents occur, or a new risk assessment is conducted.

6.3 QHSE Objectives

The organisation is to establish objectives and targets which will demonstrate continual improvement of the organisation in terms of quality, workplace safety and environmental performance. Objectives and targets are to be periodically reviewed by management.

Records are to be retained.

Explanation: In addition to the overall, aspirational objectives described in the Policy Statement, the organisation is to establish objectives and targets relevant to quality (organisation goals), workplace safety and environmental performance. These objectives and targets may arise from planning or through the risk assessment of a workplace safety or environmental issue.

Action taken is to be recorded and the objectives and targets are to be regularly reviewed, at six

monthly intervals as a minimum, to ensure performance progress.

The objectives and targets are to be recorded in some form of plan which is to be retained on file to verify continual improvement. This plan is often called an Improvement Plan or Management Plan.

Principal contractors often require an 'OHS Management Plan' or 'Environmental Management Plan' from their sub-contractors for a specific contract. Essentially, this requirement can be met by the organisation demonstrating that they have risk assessed equipment and processes relevant to the project and that objectives and targets for improvement have been established.

7   Support

7.1   Competence and Awareness

Management is to provide appropriate training for employees to ensure they are appropriately qualified to perform delegated tasks and that they understand their duties and responsibilities for identifying workplace safety and environmental hazards or risks.

All employees are to be trained so they can respond to potential emergency situations. All new employees and sub-contractors are to receive appropriate induction training.

Explanation: All employees must be adequately qualified and trained to perform the function for which they are employed and their responsibilities to report workplace safety and environmental issues. To enable this to be identified and planned, it is necessary to identify what skills are required in the organisation and provide training, where required.

Records are to be retained of qualifications (licences, etc) and training conducted by employees since joining the organisation. Evidence of training employees in emergency procedures must also be retained.

Induction training for new employees is to be documented to ensure that employees have been trained in issues such as their workplace safety and environmental responsibilities, and emergency procedures. Similar induction training is to be provided to sub-contractors, where appropriate.

7.2   Document Control

The organisation is to ensure relevant documented policies, procedures and forms are controlled so that only the current version is used by employees. All documents are to be reviewed and approved by management prior to issue.

Explanation: Maintaining appropriate documents relevant to the running of an organisation is good management practice that should be encouraged. Moreover, third party certification will be based on documentary evidence that the management system is being followed.

To ensure employees are using current documentation, it is necessary to record the existence of all controlled documentation, together with the relevant issue status. It, therefore, becomes a responsibility to ensure that all controlled documents are maintained current.

To ensure that procedures represent the existing method of operation, it is also necessary to provide a

method of amendment to existing procedures.

As organisations move to computerised documentation, the same philosophy must apply to ensure only the current, approved method of operations is being followed.

The Senior Manager is to ensure that only authorised management are permitted to approve procedures and their amendment.

7.3   Records

Records are to be retained to demonstrate that processes and inspections have been conducted in accordance with documented procedures.

These records are to be retained for sufficient time to ensure an appropriate investigation of quality, workplace safety or environmental related problems can be undertaken.

Explanation: Records must be retained in an orderly and controlled fashion to prove the system is operating in accordance with the developed procedures and other instructions. This proof may be required by auditors to ensure that processes have been carried out as planned or, alternatively, may be a means of identification and traceability. It is, therefore, necessary to maintain records in a clear, concise and easy to use manner.

Records are to be retained on file or in archive for as long as they may be required. Legislation often governs the retention period for financial records but the retention period for other records is largely a decision for the Senior Manager. However, it is accepted practice to retain personal workplace safety and environmental records in perpetuity.

8   Operation

8.1   Contracts

Before submission of a tender or quotation, the organisation is to ensure that it understands the customer's requirements and has the capability to meet the contract or order with regards to quality, workplace safety and environmental requirements.

When accepting a contract or order, the contract/order is to be reviewed by the organisation to ensure the resources are still available and to identify/resolve any differences between the contract/order and the tender/quotation. A record of this review is to be retained.

The organisation is to identify how a variation to a contract/order is made and implemented. Such amendments are to be documented.

Contract records are to be retained.

Explanation: Problems occur when the customer's expectations aren't met because the provider of the product or service didn't realise exactly what was required. The organisation should review the client's requirements for quality (and any workplace safety and environment requirements), clarify any

uncertainties and quantify the risks to price the order realistically.

Organisations should ensure that the work they have bid for in a tender or quote is what was accepted and that any additional or different work that arises is understood and considered before being accepted. Similarly, organisations should ensure they are capable of performing the work for which they have been contracted; significant legal problems can arise if contracts cannot be fulfilled.

Signing of the contract or order by management will normally be proof that this review was conducted.

The organisation should have processes in place to ensure that any variations to contracts are reviewed before being accepted by management, that those amendments are made known to employees carrying out the work and that invoicing is adjusted accordingly. The customer must be made aware of the consequences, costs, etc of any variation to the contract.

Contracts and amendments or variations to contracts must be documented and retained on file.

8.2   Control of Work

The organisation is to ensure work is effectively controlled so that the quality of work is maintained regardless of external influences, and that workplace safety and environmental requirements are consistently met.

Explanation: The types of controls used by the organisation could include documentation (eg procedures, work instructions, standard operating procedures, equipment operating manuals, checklists, SWMS, etc), the use of qualified trades people and high risk work licences, supervision, training (on the job and formal training), communication (tool-box meetings, meetings with the client or principal contractor), the use and maintenance of appropriate equipment (pre-start checks), use of special equipment or computer software programs and commissioning new plant and equipment, special work permits, monitoring (client or industry checks/inspections), sign-off on project/job completion and the use of personal protective equipment, signage and visitor control.

All equipment used should be effectively maintained to ensure continued quality and reliability and comply with any regulatory requirements (eg electrical test and tagging).

8.3   External Providers

The organisation is to ensure purchases of materials and engagement of sub-contractors comply with the organisation's Quality, Workplace Safety and Environmental Policy Statements.

Explanation: Quality of product and service usually begins with the product and service provided by suppliers. Therefore, the quality of end product or service provided to a customer is directly dependent upon the quality of the supplier.

Similarly, sub-contractors often have a direct impact on the quality of the final product or service.

It is essential that suppliers of significant materials used are advised in a formal manner of that which they are required to provide. All purchasing documents should contain information that can be clearly understood and interpreted by the supplier.

In some instances, it is not practical that this information is provided in hard copy. In these situations, records should be maintained in-house describing the orders that have been placed (eg diary or workbook).

Similarly, workplace safety and environmental requirements of the organisation should be complied with by suppliers of materials and sub-contractors used.

8.4   Emergency Plans

The organisation is to document emergency procedures for all potential workplace safety and environmental hazards. Employees are to be trained in their responsibilities should an emergency occur.

Explanation: Documented plans for realistic potential emergencies must be available for all employees on site and should cover issues such as contact details and procedures for evacuation, fire, chemical spills, medical incidents and accidents, etc.

Where emergency procedures are provided by the principal contractor, they are to be adopted by the organisation accordingly.

All employees and sub-contractors on-site are to be trained in emergency plans during induction, and there is to be periodic testing of emergency drills.

8.5   Hazardous Substances

The organisation is to ensure all hazardous substances retained on-site are identified, securely stored and controlled. Employees handling hazardous substances are to be appropriately trained.

Explanation: Hazardous substances can affect the workplace safety of employees, sub-contractors and visitors on-site and the organisation is responsible for ensuring relevant containers of substances are accurately labelled and appropriately stored so unauthorised use or misuse cannot occur.

A register should be maintained to identify what types of hazardous substances are retained on-site, in what quantities and in which location, where applicable. Should an emergency arise, this register is to be available to emergency services on their arrival.

Current Safety Data Sheets are to be retained for each hazardous substance held and made available to relevant employees for use.

9   Performance Evaluation

9.1   Internal Audits

The organisation is to undertake regular internal audits of the documented management system to ensure continued compliance. Internal audits are to be conducted on all sections of the management system documentation at least once per year.

Internal audits are to be conducted by appropriately trained employees. Records of internal audits are to be retained.

Additionally, a review of procedures is to be undertaken at a frequency based on the perceived risk of the process.

Explanation: Internal audits of the management system documentation relevant to the QHSE Code (normally known as the Manual) must be conducted by the organisation, at least annually. Internal audits may be split into two or more audits completed throughout the year. Work sheets or checklists must record objective evidence of audit findings which should then be used to base corrective action upon.

Procedures should also be audited or reviewed to ensure they still reflect the required process. These reviews should be conducted based on the risk of the process; some may be required six monthly or annually, others of lesser risk may only need to be reviewed 2, 3 or even 5 yearly.

Internal audit worksheets or checklists are to be retained as records to confirm that internal audits have been conducted. Similarly, a means of proving that a procedure has been reviewed must also be retained or recorded.

If checklists are used, continual improvement will rely on the questions being asked remaining current. Therefore, the checklist should be amended, as required, to ensure the questions remain relevant and that all sections of the management system are covered during internal audits.

Appropriate trained employees are to conduct internal audits. Alternatively, a contracted auditor may be used in lieu.

9.2   Inspections & Reviews

Regular site inspections and reviews of process/activity risk assessments are to be conducted to ensure any new hazards or risks are identified, and that any controls that have previously been implemented, remain effective.

Records are to be retained.

Explanation: As well as internal audits of the management system and reviews of procedures, sites should be inspected on a regular basis, typically six monthly, so that any new risks can be identified and ensure controls previously implemented are working effectively. This is often achieved through a checklist approach.

Similarly, risk assessments of processes are to be reviewed at a frequency based on their risk. Typically, risk assessments for equipment need not be reviewed unless the equipment is altered or modified.

Records of these inspections and reviews are to be retained on file.

10   Improvement

10.1   Reporting Issues

The organisation is to ensure all quality, workplace safety and environmental incidents, accidents, near misses and other nonconformances, which have an impact on the organisation, are identified, reported and documented.

The responsibility and process for taking immediate action is to be defined.

Explanation: When things go wrong, it is important to ensure immediate action is taken to resolve the issue. Procedures must be documented to allow employees to bring these issues to the attention of management without fear of retribution.

Similarly, the system must ensure employees are able to report workplace safety and environmental issues to management in a timely manner.

When material or product is found to be nonconforming, it must be appropriately labelled and isolated to prevent unintended use. Alternatively, it may be immediately disposed of.

Nonconformances result from many aspects of organisation, including customer complaints (internal and external), raw materials received from suppliers, product or service failure during operations, final product or service delivery, and workplace safety and environmental accidents, incidents and near misses. They may, in fact, be suggestions for improvement made by employees or customers.

Nonconformances occur in every organisation and the function of a management system is to reduce their frequency and impact, thereby facilitating continual improvement. This is achieved by identifying responsibility for actions regarding nonconformances and documenting what immediate action is required.

10.2   Corrective Action

The organisation is to investigate all significant quality, workplace safety and environmental incidents and nonconformances that are identified. Appropriate action is then to be taken to reduce the severity of the impact and the likelihood of the problem occurring again.

Explanation: At the core of any management system is the continual improvement process. Following the identification of significant nonconformances or repeating (trending) nonconformances identified through customer complaints, etc, it is essential to conduct an analysis of those nonconformances to identify which action taken will enable continual improvement and prevent a recurrence. This action is called 'corrective action' and requires a determination of the root cause of the problem and action taken to address the root cause. Sufficient evidence of corrective action must be retained to prove the continual improvement process is working.

Similarly, if a workplace safety or environmental impact is identified or an accident, incident or near miss occurs, the organisation must investigate the root cause of the impact to prevent recurrence.

Preventive action referred to in international standards is merely identifying a 'potential' issue and taking action to prevent its impact on the organisation. The same corrective action process should apply to facilitate preventive action.

Appendix 1

(informative)

Bibliography

[1]   ISO 9001:2015, Quality management systems – Requirements

[2]   ISO 14001:2015, Environmental management systems – Requirements with guidance for use

[3]   ISO 45001:2018, Occupational health & safety management systems – Requirements with guidance for use