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IEMS system document

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Preface

The following integrated system manual is written within the framework of the ISO 9001:2008 - 14001:2004 and OHSAS 18001:2007 by the employees of IEMS.

IEMS recognizes the importance of international standards, and designs and provides services in conformance with these standards.

IEMS continually works to improve the processes and procedures outlined in this manual.

We invite anyone to review this manual.
COMPANY PROFILE AND EXCLUSIONS

Company profile
We are an independent international environmental and marine services company, with headquarters in the United Kingdom.

IEMS Management have adopted and fully support a formal and continuing programme of review, evaluation and modification of operations at all levels, so that the company’s ability to provide services required by our customers may be verified and continually improved.

Through this process the company is fully committed to its continual improvement and effectiveness of implementing the integrated management system in accordance with ISO 9001, 14001 and OSHAS 18001.

The company is specialized in planning, providing and installing custom contingency equipment packages as well as oil spill deflection and protection systems that maybe adopted.

Clients include major oil and gas companies, national oil companies, government agencies, and various other companies and organizations involved in the handling and transport of oil and other substances or those that can be affected by a release of oil and other substances.

The capabilities and internationally certified management system of IEMS is designed to help clients satisfy their facility and vessel response planning requirements mandated by national laws and the International Convention on Oil Pollution Preparedness, Response and Co-operation (OPRC 90). The International Convention for the Prevention of Pollution from Ships, 1973 as modified by the Protocol of 1978. (MARPOL 73/78)

The international conventions and the national laws of most countries requires that those who transport petroleum and petroleum products ensure the resources necessary to respond to a worst case discharge to the maximum extent practicable. This is normally achieved through the application of the internationally recognised Tiered response system or a similar system.

IEMS offers a response capability intended to help satisfy the following response planning requirements in accordance to the Tiered response system which covers:

- Operational Discharge (Offshore / Near shore)
- Worst Case Discharge (Offshore / Near shore)
- Shallow Water Response Capability
- Shoreline Protection and Clean-up
- On land response and clean up
- Dispersants

IEMS currently provides these services from key worldwide locations.
Exclusions to scope ISO 9001
(7.3 And 7.5.2 - 9001)

This Manual does not formally address the issues of ISO 9001 Clause 7.3 – Design and Development. The company has excluded clause 7.3 from its system as it is only responsible for assembling response kits and providing oil spill response prevention, preparedness and response services and is not responsible for the design of the input or output materials.

IEMS has excluded 7.5.2 from the quality system as there are no processes where the resultant output cannot be subsequently verified.
The IEMS Organization structure has been designed to effectively provide support to clients irrespective of the services or response required.

IEMS has made every effort to provide an organizational structure flexible enough to be used at all incidents, small and large, yet rigid enough so that various departments and centres personnel can operate effectively under one internationally recognised system.

IEMS has been operating the Egyptian National Tier 2 oil spill response center for more than 3 years and recently renewed the contract, providing onshore and offshore response and related emergency support services.
MISSION, VISION AND VALUES

Mission

Our mission is to be recognized as an environmental and marine service company of choice for our clients, employees and international partners/associates through innovative, high quality, value added solutions delivered with enthusiasm, integrity and professionalism with the utmost regard for the safety of individuals and the protection of the environment.

Vision

The vision of iems is to provide services based on having a detailed knowledge of the clients we serve and the industry we are in. We will keep abreast of the ever-changing social and economic climate that local, national, regional, and international events have on clients and how they may reflect on the demands for our services. We will react to those demands and set the pace for change.

Values

We respect each person as individuals and through our employee development programs and competency based training we assist each person to achieve their full potential. We strive to maintain a fun and rewarding workplace where our employees feel fulfilled at the end of each working day.

Our task is to achieve positive outcomes in both environmental management and marine service provision and development while adhering to uncompromised ethics and codes of conduct as professionals and business people.
INTEGRATED QHSSE POLICY

(5.3 – 9001, 4.2 - 14001 & 18001)

International Environmental and Marine Services Company (IEMS) provides a comprehensive range of oil spill Prevention, Preparedness and Response services to government and industry, in line with national legislation and international conventions.

We strive to maintain a good quality services and an accident free workplace. We take a leadership position in the protection of the Environment, the Health, Safety and Security of our employees. We adopt similar standards for our contractors, suppliers, the user of our products and the communities in which we operate. We have a constant quest for the continual improvement.


We have developed this integrated quality, health, safety, security and environmental policy to preserve the vision of the company and to be our approach to achieve our objectives and our strategy. We aim to:

• Satisfy Our Clients’ Needs while working to fulfill their anticipations and desires to reach their complete satisfaction for the services that our company provides.
• Reduce Pollution and guarantee the environment protection through the consensus with the entire existing environment related laws and legislations.
• Maintain an Emergency Plan for IEMS office(s) and all sites related to the company to identify and manage potential emergency situations & accidents that can have an impact on the environment or risk the safety and security of employees, contractors or visitors.
• Carry out Risk Assessments by evaluating the risks arising from hazards, taking into account the adequacy of any existing controls, and deciding whether or the risks are acceptable and recognizing that a hazard exists and defining its characteristics.
• Maintain Continual Improvement through regular skill development and training for employees at all levels to raise the competency level.
• Disseminate the Quality, Health, Safety, Security and Environment Procedures, and make sure these are well delivered and received by company employees and all related parties.
• Activate and Follow Up the corrective and preventive actions.
• Review the Quality, Health, Safety, Security and Environment Policy bi-annually at the management review meeting.
• Monitor and Review the Performance and Effectiveness of our integrated system, improvement plans and objectives and assess compliance through internal audits and periodic management meetings.

We shall provide adequate and appropriate resources to implement this policy whilst encouraging involvement and adopting best practice in a culture where employees and managers are aware of their individual health, safety, security and environmental responsibilities and are actively engaged and committed to improving standards and meeting our goal of zero harm.

Below: TUV Certificates
SCOPE OF REGISTRATION

Providing marine and environmental services which include Oil Spill Response, Contingency Planning and Training.

SYSTEMS MANUAL

General requirements

(4.1 9001 – 14001 & 18001)

This Systems Manual controls and supports our systems policies and objectives and is subject to internal audit in order to ensure its continuing effectiveness and compliance with ISO.9001, 4001 and OHSAS 18001. (To be replaced by ISO 45001 - 2017)

The company has identified its core business processes (see environmental assessments 5.1.3 and risk assessments 5.1.4), which are the subject of documented procedures in order to provide for management control and operational consistency. We have identified the necessary resources to support the operation and monitoring of these processes.

The company will continually monitor measure and analyse these processes, and implement actions necessary to protect our employees and those working within our control.

We continually strive to achieve management efficiency and client satisfaction and protection of the environment.

Figure 1- QHSSE System Manuals
PROCEDURE (Integrated Management System)

Documentation requirements

General and Documentation

(4.2.1 - 9001 & 4.4.4 – 14001 / 18001)

This QHSSE Manual includes documented statements, an Integrated Management Policy, objectives, targets and procedures required by ISO 9001, 14001 and OHSAS 18001. This ensures effective planning, operation and control of processes relating to the company's business operations and the significant risks along with environmental aspects arising out of our activities.

Quality Manual

(4.2.2 – 9001)

This Manual describes the nature of the company and the scope of activities it undertakes, together with a brief description of the interaction between the various processes.

Document and Record Control

(4.2.3 – 9001 & 4.4.5 14001 / 18001) Records (4.2.4 – 9001 & 4.5.4 14001 / 18001)

IEMS has established a documented procedure to control documents and records. This will ensure that all documents are reviewed, updated, and authorised, and that current versions of documents are available in a legible and readily identifiable format and defines controls needed for the identification, storage, protection, security, retrieval, retention time and disposition of records.

Procedure Reference

» Document and Record Control Procedure PI-DRCP/1

Environmental Aspects

(4.3.1 - 14001)

IEMS has established a procedure for identifying environmental aspects and to determine those aspects that have or can have significant impact on the environment.

Procedure Reference

» Environmental Aspect Procedure PI-EAP/3

The results of this assessment are recorded on the register of Environmental aspects PI-EAP/3-3

Hazard Id, Risk Assessment and Controls

IEMS has established a procedure for identifying hazards, risk assessment and determining controls to prevent injury and ill-health. The procedure covers routine and non-routine activities such as maintenance and emergency situations which includes the activities of contractors, workplace equipment and facilities, and is also applied to proposed activities.

Risk assessments are updated in the event of change in legislation, working environment, raw materials, equipment or personnel and are reviewed at least annually by the management team. Changes or proposed changes within IEMS, its activities products or materials shall be assessed and risk assessments reviewed to take into account new hazards resulting from change, including their adaption to human capabilities, the design of the workplace, processes, installations, machinery, equipment, operating procedures and work organisation. The output from the risk assessment process shall determine the need for health surveillance where appropriate.

Procedure Reference

» Hazards and Risk Control PI-HRC/6
Legal and Other Requirements

(4.3.2 – 14001 / 18001)

IEMS has established a procedure for identifying and updating applicable legal requirements.

Procedure Reference

» Legal Requirements PI-LRPL/2

Planning, Objectives, Targets and Programme

(5.4 – 9001, 4.3.3 – 14001 / 18001)

Measurable objectives have been formulated and communicated to all personnel as appropriate. Procedures, processes and management system controls have been developed to help ensure that these objectives are met. The results of management system effectiveness and client satisfaction monitoring is analysed and reviewed in conjunction with these objectives.

Specific environmental and Health & Safety objectives and targets have been documented and communicated. These objectives are measurable (where practicable) and include commitments to prevention of pollution, compliance with applicable legal requirements and continual improvement. Targets and objectives in relation to the Quality, Environmental and Health & Safety management system are set and monitored via Management Meetings. Review of objectives takes into account significant environmental aspects, Health & Safety risks, technology, operational and business requirements and inputs from interested parties.

The management system procedures describe how Quality, Environmental and OH&S SMART objectives and targets are set and monitored. When establishing and reviewing its SMART objectives the company considers legal and other requirements, its significant environmental aspects, its technological options in conjunction with its financial, operational and business requirements, and the views of interested parties.

Procedure Reference

» Occupational Health and Safety Manual OHS/M
» Environmental Programs And Monitoring PI-PMP/4
» Hazard Identification and Risk Control PI-HRC/6
» Management Of Meetings PI-MMP/7
» Objectives, Measurement and Analysis PI-OMA/14

Management responsibility

Client Focus

(5.2 – 9001 & 4.3.1, 4.3.2, 4.6 – 14001 / 18001)

The Management ensures that client requirements are determined through written confirmation at the point of order. Any special requirements as orders progress are recorded. This ensures relevant standards are met with the aim of enhancing Client Satisfaction.

Procedure Reference

» Business Management PC-BM/2
» Contract Management PC-CP-CONP/8
» Client Satisfaction PI-CSP/10
Resources, Responsibility, Authority and Communication

(5.1, 5.5, 6.1, 6.2 – 9001 & 4.4.1 – 14001 / 18001)

Responsibility and authority for implementing various aspects of the Company’s business activities are identified in the relevant documented procedures.

The CEO has overall responsibility for the integrated management system and is supported by the QHSSE Manager or Nominee who is also the Management Representative “MR”. The QHSSE Manager or nominee shall ensure that the processes relating to the maintenance of the business system are implemented, and ensure that all staff are aware of any potential risks, impacts on the environment, legal and client requirements. Details of the responsibilities of the QHSSE Manager are contained in the relevant job description. In the absence of the QHSSE Manager, those responsibilities will be carried out by the CEO.

The Management system auditor is responsible for the auditing of management system processes and reporting audit findings to the Management Representative.

Employees are responsible to act within the legal responsibilities imposed upon them and the company QHSSE Policies. All employees are to be familiar with the management system policies and procedures of the company.

Visitors / Business Partners are made aware of the Management System, company policy and procedures. During their time at IEMS offices and or sites, all visitors are to conduct their business with due consideration to create a minimum impact on the environment and observe the QHSSE Policies.

Additional responsibilities are described in the company management procedures. A list of these is in Appendix 1 of this manual. Appropriate resource will be made available essential to the implementation, maintenance and improvement of the integrated management system. The company structure is documented in an organisation chart located on the company Notice boards see Figure 1.1.1 – IEMS Organisation Chart

Procedure Reference

» QHSSE Manual QHSSE/M
» OHS Manual OHS/M
» System Procedures PC & PS

Communication, Participation & Consultation

(5.5.3 & 7.2.3 – 9001 & 4.4.3 – 14001 / 18001)

We have integrated communication, participation and consultation within the standard operations procedure (Routine Communication), the Environmental Programs and Monitoring procedure (Environmental Communication) and the Emergency Response Procedure (Emergency Communication).

IEMS ensure that all employees, contractors and visitors are informed and consulted on matters relating to the Integrated Management System as follows:

• Integrated Management Policy
• An outline of the IMS issues relating to the tasks in hand, specifically their work area, risk assessments and method statements
• The importance of IMS issues at IEMS, and their context in relation to the overall activities of the Company
• The general structure of the IMS and its component parts
• Their own role within the IMS system, and the potential consequences of non-compliance

Communication for general internal company matters is achieved by way of a company notice board. Formal communication is conducted manually to staff members concerned.
Notification of change shall be communicated through management meetings and staff briefing sessions so as to ensure active consultation and participation in the planning of the IMS, prior to the introduction of the change.

An executive decision has been made not to communicate externally about the company’s environmental significant aspects.

Communication regarding product information, enquiries, contract or order handling including amendments and client feedback is dealt with by means of electronic communication throughout the company.

External communication from clients or other stakeholders are dealt with in accordance with this procedure. The client shall be consulted as to the environmental and health & safety risks on their sites.

Procedure Reference

» Environmental Programs and Monitoring PI-PMP/4
» Management of Meetings PI-MMP/7
» Emergency Response Procedure PI-ERP/5
» Standard Operating Procedure PC-SOP/1
» Client Satisfaction PI-CSP/10

Management Review

(5.6 – 9001 & 4.6 – 14001 / 18001)

The continued suitability, adequacy and effectiveness of the QHSE system shall be reviewed by Senior Management at least annually. This will include an assessment of any improvement opportunities and the need for any changes to the QHSE System, including policy and objectives. A record of all Management Review Meetings is maintained.
Review Input

(5.6.2 – 9001 & 4.6 – 14001 / 18001)

The review inputs include, but are not limited to:

- Follow up actions from previous reviews.
- Results of internal audits.
- Client feedback, complaints and analysis.
- Process performance and service conformity.
- Status of corrective and preventive actions.
- Changes affecting the Management System.
- Improvement recommendations.

Review Output

(5.6.3 – 9001 & 4.6 – 14001 / 18001)

The outputs from this review will include actions and decisions in relation to

- Improvements in the effectiveness of the IMS.
- Required resources
- Training requirements.
- Required audits.
- Client service and delivery improvements.

In addition to the annual review, a document review will be carried out in the event of:

- An incident or accident occurring on a site or notified to IEMS from external sources that may indicate that a change of the document is required.
- Information collated that indicates that a review may be required.
- Organizational change sufficient to require significant alternation.
- Changes to the scope of or nature of the operations of IEMS.
- Unsatisfactory audit report.
- Notification from clients or other sources of revisions to the Standards that indicate changes are required.
- Update on relevant legislation.

Any updated legislation or standards will be identified and reviewed by the MR and where relevant, brought to the attention of the company management during monthly meeting cycles. Where updated legislation/standards affect the company, changes are agreed and amendments to procedures undertaken by the MR. Information from these changes will be communicated to all staff orally by briefings or toolbox talks, and where relevant, in hard copy formats and controlled documents.

Under the direction of the CEO, changes arising from the review will be progressed by the relevant manager for that particular area of responsibility.

Procedure Reference

» Management of Meetings PI-MMP/7
Resource Management

(6.0 – 9001)

It is IEMS policy that personnel performing work affecting quality are competent based on appropriate education, training, skills and experience. This is verified through audit and review, and is recorded as appropriate in an individual's personnel file.

Conformity to product requirements may be affected directly or indirectly by personnel performing any task within the integrated management system.

Procedure Reference
- QHSSE Manual QHSSE/M
- Occupational Health and Safety Manual OHS/M
- Standard Operating Procedure PC-SOP/1
- Environmental Programs and Monitoring PI-PMP/4
- Hazard Identification and Risk Control PI-HRC/6
- Management of Meetings PI-MMP/7
- Objectives, Measurement and Analysis PI-OMA/14
- Client Satisfaction PI-CSP/10
- Security Statement and Procedures PI-SSP/11
- Nonconformity, Corrective, and Preventive Actions PI-NCPP/8

Competence, Training and Awareness

(6.2.1, 6.2.2 – 9001 & 4.4.2 – 14001 / 18001)

IEMS has identified the training needs of its entire staff to ensure they are aware of the importance of conformity with the Integrated QHSSE Policy, procedures and applicable control measures. All significant risks and environmental aspects that are related to the actual work carried out by each individual are identified to ensure competency, sufficient training and raise awareness of potential consequences of what could happen if procedures are not followed.

Where equipment requires particular operator skills from the outset, the company ensures that staff has the minimum qualifications on engagement and trained as necessary to meet the specific needs. Continued staff competence is monitored annually and any training requirement as a result is identified and considered for action. Training is monitored and evaluated for effectiveness on individual staff training records.

Procedure Reference
- Human Resources PS-HRP/1-5.3

Infrastructure

(6.3 – 9001 & 4.4.1 – 14001 / 18001)

All functional areas are provided with the infrastructure required to achieve conformity to business and quality requirements. This includes buildings, workspace, equipment, vehicles, communications, information systems and supporting services.

The suitability of buildings, equipment, plant, machinery and workspace is reviewed during management review and periodic internal management meetings.

Procedure Reference
- Management of Meetings PI-MMP/7
Work Environment

(6.4 – 9001)

Appropriate working environments have been considered and implemented in achieving service conformity. These include appropriate office space, IT infrastructure, utilities and facilities. Health & Safety issues are considered and appropriate practices implemented to ensure safe working conditions.

The term “working environment” relates to conditions under which work is performed including physical, environmental and other factors (such as noise, temperature, humidity, lighting, or weather).

Procedure Reference

- QHSSE Manual QHSSE/M
- Occupational Health and Safety Manual OHS/M
- Standard Operating Procedure PC-SOP/1
- QHSSE Policy

Product realisation

(7.0 – 9001 & 4.4 – 14001/18001)

Planning of Product Realisation and Operational Control

(7.1 – 9001 & 4.4.6 – 14001 / 18001)

Planning of product (output material) and service realisation is carried out at the initial phase of a major contract or the introduction of waste / output materials. This process may include the review and planning of quality objectives and requirements for the output material / service, the documents and resources required. The planning of output material and service realisation also includes the required verification, validation, monitoring, measurement, inspection and test activities specific to the service and the criteria for output material acceptance.

For any major new projects, project management activities and planning is carried out during the concept phase of a project.

Procedure Reference

- Client Satisfaction PI-CSP/10
- Business Management PC-BM/2
- Contract Management PC-CP-CONP/8
- Nonconformity, Corrective, And Preventive Actions PI-NCPP/8

Client Related Processes

(7.2 – 9001)

IEMS determines and reviews requirements specified by the client related to the product through liaisons with the client via the appointed Project Manager who shall and on conclusion of the contract despatch an order of acknowledgement.
Determination, Review of Products requirements

(7.2.1, 9001 & 4.3.1, 4.3.2, 4.4.6 14001 / 18001)

The Project Manager is responsible for any matters involving client feedback and/or complaints. Statutory and regulatory requirements relating to the product are determined along with any additional client requirements in the business development phase.

Validation of equipment, people and the working environment is carefully planned and documented by the respective Project Manager prior to the work commencing (see Business Management and contract management records).

Client complaints are logged and processed according to the Client satisfaction procedure, where a complaint cannot be resolved a Non-Conformance shall be raised.

Procedure Reference

» Client Satisfaction PI-CSP/10
» Business Management PC-BM/2
» Contract Management PC-CP-CONP/8
» Nonconformity, Corrective, and Preventive Actions PI-NCPP/8

Review of client requirements

(7.2.2 – 9001 & 4.3.1, 4.4.6 - 14001 / 18001)

All client orders / contracts are reviewed to ensure that service, quantity and delivery requirements can be satisfied. Orders received as part of an existing contract are reviewed to ensure alignment with existing enquiries or orders. Any conflict with the standard operational processes is referred back to the client for resolution.

Orders or enquiries for new or non-standard services are reviewed and referred to the CEO to establish whether current processes and controls are suitable. Any changes to order requirements are reviewed and communicated to other functions within the company. Records of these reviews are maintained.

Procedure Reference

» Client Satisfaction PI-CSP/10
» Business Management PC-BM/2
» Contract Management PC-CP-CONP/8

Client communication

(7.2.3 – 9001 & 4.4.3 - 14001 / 18001)

Product and service information is supplied to clients via website, brochures, email and through direct sales / personal contacts.

Communications such as enquiries, quotes, orders and amendment details are appropriately stored and identified by client and contract number. Client feedback is proactively sought via direct contact and satisfaction monitoring.

Procedure Reference

» Client Satisfaction PI-CSP/10
» Business Management PC-BM/2
» Contract Management PC-CP-CONP/8

Design and Development

(7.3 - 9001) Excluded – no design or development activities are currently carried out by IEMS.
Purchasing
(7.4. – 9001 & 4.4.6 14001 / 18001)

Evaluation and Selection of Partners and Suppliers
(7.4.1 – 9001 & 4.4.6 14001 / 18001)

Suppliers and subcontractors are selected on their ability to provide quality goods and services, delivered on time and at the right price. All suppliers, including outsource partners, are subjected to a supplier quality assurance process. The level and depth of this process depends on the impact the supplied product or service has on service realisation. A list of approved suppliers is maintained and their performance monitored.

Subcontractors are reviewed on an annual basis to establish their suitability to act on IEMS behalf. IEMS realise the importance of fostering good supplier relationships. All key suppliers have been made aware of requirements in terms of quality and regulatory requirements, delivery and price and they are encouraged to highlight any concerns they may have about meeting these requirements.

Procedure Reference
» Purchasing PS-LOG-PUR/1

Purchasing Information
(7.4.2 – 9001)

Numbered purchase orders are used for the purchase of all key goods and services. Order numbers are generated and recorded via a purchase order system. Purchase orders contain sufficient details to accurately describe the product or services ordered, and will be supported by detailed purchasing information such as supply agreements or specifications where appropriate.

Procedure Reference
» Purchasing PS-LOG-PUR/1

Verification of Purchased Product
(7.4.3 – 9001)

Suitable verification documentation is requested from suppliers as appropriate. This documentation is requested via the purchase order and can include certificates of conformity and associated data. If required within the contract, arrangements for the client to verify purchases and subcontracted work will be written into the purchase order.

Procedure Reference
» Purchasing PS-LOG-PUR/1

Production and service provision
(7.5 – 9001 & 4.4.6 14001 / 18001)

Control of Product and Service Provision
(7.5.1 – 9001)

IEMS Products and services are performed under controlled conditions. This includes:

• The use of work instructions (where necessary).
• Monitoring and verification of products and services.
• Standard working methods.
• Identification of standards of acceptable work to be achieved by staff.
Validation of Processes for Product and Service Provision

(7.5.2 – 9001)

IEMS has excluded 7.5.2 as the output from service provision processes are verified through subsequent monitoring or measurement. Where appropriate, the capabilities of all service processes are regularly monitored to achieve ongoing improvement and re-validation.

Identification and Traceability

(7.5.3 – 9001)

A unique number identifies all work being processed, and is allocated on receipt of an order. This number is recorded on all documentation associated with that individual contract process and affords product/service traceability throughout the contract or work order period.

Procedure Reference

» Business Management PC-BM/2
» Contract Management PC-CP-CONP/8

Client Property

(7.5.4 – 9001)

If the company is requested to manage and or carry out work operations to client–supplied materials, products including drawings and any other intellectual property, they will be identified or labelled throughout.

Procedure Reference

» Client Property PC-CP-CLP

Preservation of Product

(7.5.5 – 9001)

There are procedural contrails for material storage to ensure that the conformity of the product is preserved until it is delivered to its final destination.

Procedure Reference

» Logistics PS-LOG/2
» Inventory Tracking and Traceability PS-LOG-ITT/2
» Client Property PC-CP-CLP

Control of Monitoring and Measuring Equipment

(7.6 – 9001 & 4.5.1 – 14001 / 18001)

All Measuring and Monitoring Equipment that the company has identified as needing calibration is labelled for identity and calibration is controlled and records are kept in the Equipment Calibration Log. They are protected and stored to safeguard them against damage that could invalidate the measurement result.

Procedure Reference

» Environmental Programs and Monitoring PI-PMP/4
Measurement, checking, analysis and improvement
(8.0 – 9001 & 4.5 – 14001 / 18001)

The company has a procedure to Monitor and Measure the key characteristics of our activities that have a significant risk, client or environmental impact. The procedure covers information on performance, applicable operational controls and conformity with legal requirements. The resulting data is used to formulate appropriate corrective and preventive action.

Procedure Reference

» Hazards and Risk Control PI-HRC/6
» Environmental Aspects PI-EAP/3
» Environmental Programs and Monitoring PI-PMP/4
» Objectives, Measurement and Analysis PI-OMA/14

Validation of Processes for Production and Service Provision
(7.5.2 – 9001)

IEMS has excluded 7.5.2 as the output from service provision processes are verified through subsequent monitoring or measurement. Where appropriate, the capabilities of all service processes are regularly monitored to achieve ongoing improvement and re-validation.

Client Satisfaction
(8.2.1 – 9001)

Realizing the importance of an active working relationship with its clients, the Company measures client Satisfaction using information gathered from the Client Satisfaction Questionnaire, face to face contact, client testimonials & complaints and repeat business. This data is analyzed and presented for review at Internal Management and Operational meetings as well as Management Review Meetings.

Procedure Reference

» Management of Meetings PI-MMP/7
» Client Satisfaction PI-CSP/10

Internal Audit
(8.2.2 – 9001 & 4.5.5 – 14001 / 18001)

The company audits its own activities at regular intervals. Internal auditing is subject to a Documented Procedure which sets out the process. The audits will be carried out by competent auditors, who will ensure that audits are completely objective, conform to the planned arrangements and the relevant standards. The results of audits will be reviewed at Management Review Meeting to ensure that appropriate corrective, and particularly preventive action, is implemented and effective.

Procedure Reference

» Internal Audits PI-IAP/9

Evaluation of Compliance
(4.5.2 – 14001 / 18001)

A procedure has been created to establish, implement and maintain a system for periodic evaluation of compliance with applicable legal requirements (see also Legal and Other Requirements section 5.1.5)

Procedure Reference

» Legal Requirements PI-LRPL/2
Non-Conformity, Corrective and Preventive Action

(8.3 - 9001 & 4.5.3 – 14001 / 18001)

The control of actual and potential nonconformity in the company is the subject of a documented procedure which sets out how both internal and external nonconformities are processed. A Non-Conformance and Corrective and Preventive Action are subsequently recorded on the system.

The Corrective and Preventive Action procedure is to evaluate and respond to non-conformances which occur within the IEMS QHSSE System.

The following are examples of sources of non-conformances:

- Emergency Preparedness and Response Report
- Internal EMS auditing findings
- Registrar EMS audit findings
- Preventive Action Review
- Monitoring and Measurement Records
- Input from employees
- Procedure Non-Conformance
- Incidents / Near Misses
- Regulatory Non-Conformances

A Non-Conformance register is maintained which also relates to suppliers and internal nonconformities in order that they can be analyzed and reviewed to determine underlying system deficiencies and other factors that might be causing or contributing to the occurrence of incidents.

Immediate action taken will be appropriate to the magnitude of the problem, occupational health and safety risk and environmental impacts.

Where the corrective and preventive action identifies new or changed hazards, or the need for new or changed controls, a risk assessment shall be undertaken prior to the implementation of the change.

Procedure Reference

- Nonconformity, Corrective, and Preventive Actions PI-NCPP/8
- Hazards and Risk Control PI-HRC/6
- Emergency Response Procedure PI-ERP/5
- Emergency Preparedness and response

(4.4.7 – 14001 / 18001)

The company will respond to actual emergency situations and accidents and prevent or mitigate associated adverse risks or environmental impacts and has a procedure to identify the potential emergency situations and accidents that can have an impact on the environment. Review of our emergency preparedness and response procedure is tested and reviewed annually or after the occurrence of accidents or emergency situations.

Procedure Reference

- Emergency Response Procedure PI-ERP/5
Analysis of Data

(8.4 – 9001 & 4.5.1 – 14001 / 18001)

The Company collects data generated by monitoring activities and other relevant sources. This data is then analyzed and used to determine the effectiveness of the Systems Manual and for identifying where improvements can be made. Typical data sources are:

- The suitability, effectiveness and adequacy of the QHSSE System
- Applicable operational/process controls and trends.
- Health Surveillance
- Client Satisfaction and Dissatisfaction.
- Conformance to Client Requirements, objectives and targets
- Characteristics of Processes and Products.
- Performance monitoring where required by the standard

Procedure Reference

» Hazards and Risk Control PI-HRC/6
» Environmental Aspects PI-EAP/3
» Environmental Programs And Monitoring PI-PMP/4
» Objectives, Measurement and Analysis PI-OMA/14
» Emergency Response Procedure PI-ERP/5
» Management of Meetings PI-MMP/7
» Contract Management PC-CP-CONP/8
» Business Management PC-BM/2

Improvement

(8.5 – 9001)

Continual Improvement

(8.5.1 – 9001 & 4.2, 4.3.3, 4.6 – 14001 / 18001)

Opportunities for continual improvement will be identified through the review of integrated QHSSE policy, objectives, audit results, analysis of data, corrective and preventive actions and management review.

Improvements identified and implemented, and the resulting benefits are monitored and the results reported at the management review.

Procedure Reference

» QHSSE Policy PI-QHSSE-P
» Objectives, Measurement and Analysis PI-OMA/14
» Internal Audits PI-IAP/9
» Nonconformity, Corrective, And Preventive Actions PI-NCPP/8
» Management of Meetings PI-MMP/7
Operational Control

(4.4.6 – 14001 / 18001)

Based on the significant risks and environmental aspects arising out of our activities, additional controls are described in the company management procedures. A list of IEMS procedures is in the Appendix.

Security

(5.1, 5.5, 6.1, 6.2 – 9001 & 4.4.1, 4.4.6 – 14001 / 18001)

- The Management Team of IEMS is fully committed to the security of IEMS Employees, Contractors, Visitors and Company/Client assets. We firmly believe that security is of primary importance and essential to the continued growth, profitability and the success of IEMS. We are committed to business continuity to fulfill our clients’ needs and safeguard our shareholders.

- The IEMS security procedure provides reasonable assurances for minimizing security risks and business losses. As part of our commitment to security we shall:

- Develop each location’s security program based on the results of site surveys and vulnerability analyses to determine the extent of each location’s security program.

- Maintain physical Security, Personnel Security, Technical Security, IT Security and Assets Protection by maintaining appropriate control of access to all locations where IEMS has owned or managed offices, response centre(s) or sites.

- Implement the IEMS Emergency Response Procedure IEMS-PI-ERP/5 at each IEMS office, response centre(s) and sites.

Where specific clients have unique security requirements, IEMS shall adapt such security requirements as defined by the specific contract. Where for whatever reason IEMS cannot achieve a specific security requirement or standard, we shall provide and communicate alternate means of adequate protection with approval for deviations and or exceptions through line management.

Procedure Reference

» Security Statement and Procedures PI-SSP/11
» Hazards and Risk Control PI-HRC/6
» Standard Operating Procedure PC-SOP/1
» Incident Coordination System PC-ICSP/4
» Response Management System PC-CPRMS/5
» Client Property PC-CP-CLP
» Business Management PC-BM/2
» Contract Management PC-CP-CONP/8
» Emergency Response Procedure PI-ERP/5
## APPENDICES

### Table 2 Correspondence between IEMS Procedures and Standards

<table>
<thead>
<tr>
<th>Document Name</th>
<th>Doc. No.</th>
<th>Corresponding Standards 9001, 14001 AND 18001</th>
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<td>QHSSE Manual</td>
<td>QHSSE/M</td>
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<td>PI-QHSSE-P</td>
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<td>Document and Record Control</td>
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<td>PI-LRPL/2</td>
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<td>Environmental Aspects</td>
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<td>QHSSE Programs And Monitoring</td>
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<td>Emergency Response Procedure</td>
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<td>Nonconformity, Corrective, And Preventive Actions</td>
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<td>Internal Quality/ Environmental/Health , Safety And Security Audits</td>
<td>PI-IAP/9</td>
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<td>PI-CSP/10</td>
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<td>Objectives, Measurement and Analysis</td>
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<td>Work At Height And Use Of Ladders</td>
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<td>Care And Control Of Contractors</td>
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<td>Electricity And Electrical Appliances</td>
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<td>OHS/ATV/27</td>
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<td>OHS Records and Forms</td>
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