

GSA Occupational Health and Safety Policy

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Prepared By:	
Name	Department/Role/Team
[REDACTED]	[REDACTED]

Reviewed By:		
Name	Department/Role/Team	Signature
[REDACTED]	[REDACTED]	e-signed in paperless
[REDACTED]	[REDACTED]	e-signed in paperless
[REDACTED]	[REDACTED]	e-signed in paperless
[REDACTED]	[REDACTED]	e-signed in paperless

Approved By:			
Name	Role	Signature	Date
Carlo des Dorides	Executive Director		29/04/2019

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Acronyms and Abbreviations

Table 1 - Abbreviations

Abbreviation	Definition
DMS	Document Management System
EC	European Commission
EU	European Union
GNSS	Global Navigation Satellite System (e.g. GPS, Galileo, GLONASS etc.)
OHS	Occupational Health and Safety
GSA	European GNSS Agency
OED	Office of the Executive Director
TMS	Training Management System
HOA	Head of Administration
TBU	To be updated
PPE	Personal Protective Equipment
HSO	Health and Safety Officer

1 Applicable and Reference Documents

1.1 Applicable documents

Applicable Documents:		
Type	Title	Reference
AD1	REGULATION (EU) No 512/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 April 2014 amending Regulation (EU) No 912/2010 as amended by 512/2014, setting up the European GNSS Agency	REGULATION (EU) No 512/2014, 16 April 2014
AD2	Council Directive 89/391/EEC of 12 June 1989 on the introduction of measures to encourage improvements in the safety and health of workers at work	89/391/EEC of 12 June 1989
AD3	C(2006) 1623 of 21 April 2006 establishing a harmonised policy for health and safety at work for all European Commission staff Note: This document sets basics principles of adopting EU and local regulations in area of safety in order to protect staff and prevent injuries. This document is not applicable in GSA, but sets fundamental principles.	C(2006) 1623 of 21 April 2006
AD4	REGULATION No 31 (EEC), 11 (EAEC), laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Union	OJ 45, 14.6.1962, p. 1385 in its last amended version
AD5	Protocol No 7 on the Privileges and Immunities of the European Union annexed to the Treaties	TUE
AD6	CZ hosting agreement on site and support, privileges and immunities between the European Global Navigation Satellite	74/2012Sb.m.s., Sdělení

Applicable Documents:		
Type	Title	Reference
	Systems Agency (GSA) and the government of the Czech Republic	Ministerstva zahraničních věcí
AD7	Décret n° 2014-1507 du 15 décembre 2014 portant publication de l'accord relatif à l'hébergement et au fonctionnement du centre de sécurité Galileo (ensemble une annexe), signé à Paris le 12 juin 2013	Décret n° 2014-1507 du 15 décembre
AD8	Agreement on the hosting of the backup site of the Galileo Security Monitoring Centre between the European Commission, the European GNSS Agency and the Kingdom of Spain	C(2018)8642/F1 GROW (DG Internal Market, Industry, Entrepreneurship and SMEs)
AD9	Other applicable documents are set and monitored as described in section Legal and other requirements and Form 5	GSA-FML-FM-POL-220382, Form 5

1.2 Reference documents

List of reference documents for this policy, i.e. the documents for which part but not the entirety of the content would apply to this policy.

Table 2 - Reference Documents

Reference Documents:		
Type	Title	Reference
RD1	GAL-PL-GSA-GSMC-X-108262-A1-v01-0_GSMC-FR Health and Safety at Work	
RD2	GAL-PRO-GSA-GSMC-X-108142-V01-0_GSMC-FR Health and Safety Briefing For New Staff Members	
RD3	GSA-FML-FM-POL-245038 Fire protection rules	
RD4	Guideline Internal Audit GEN_PRO_GSA_OED_205628	
RD5	Commission Decision laying down general implementing provisions for the reimbursement of medical expenses	
RD6	COMMON RULES on the insurance of officials of the European Communities against the risk of accident and of occupational disease	

2 Attachments and forms

FORMS and ANNEXEX:		
Type	Title	Reference
Form F1	PPE personal card EN	 Form 1 - PPE personal card_en.doc

FORMS and ANNEXEX:		
Type	Title	Reference
Form F2	Log list of all injuries GSA	 Form 2 - Log list of all injuries GSA.xlsx
Form F3	Risk assessment EN	 Form 3 - Risk assessment_en.xlsx
Form F4	Health risk register_final_en	 Form 4 - Health risk register_final_en.xlsx
Form F5	Legal requirements register	 Form 5 - Legal requirements.xlsx
Form F6	Training_OHS_Employees	 Form 6 - Training_OHS_Employ
Form F7	Training_OHS_Managers	 Form 7 - Training_OHS_Managi
Form F8	Accident and injury report_en	 Form 8 - Accident and injury report_en.d
Form F9	Investigation and measures form_en	 Form 9 - Investigation and mea
Form 10	Contractors safety risk exchange and coordination CZ Contractors safety risk exchange and coordination EN	 Form 10 - Exchange of risk with cotractor  Form 10 - Exchange of risk with cotractor
Form 11	OHS annual safety inspection - full checklist CZ/EN	 Form 11 - OHS annual safety inspect
Form 12	Appointment - electrical and pressure appliances	 Form 12 - Appointment - electr

FORMS and ANNEXEX:		
Type	Title	Reference
Att 1	PPE assessment and prescription_en	 Att 1 - PPE assessment and presc
Att 2	First aid box content_cz	 Att 2 - First aid box content_cz.doc
Att 2	First aid box content_en	 Att 2 - First aid box content_en.doc
Att 3	Safety Rules for PRG HQ	 Att 3 - Safety Rules for PRG HQ.docx
Att 4	LOSI - electrical appliances	 Att 4 - LOSI - electrical appliances.
Att 5	LOSI - ladders	 Att 5 - LOSI - ladders_en.docx
Att 6	LOSI - racks and shelves rules and inspection	 Att 6 - LOSI - racks and shelves rules anc
Att 7	LOSI - storage rules	 Att 7 - LOSI - storage rules CZ-EN.
Att 8	LOSI - wellbeing room	 Att 8 - LOSI - wellbeing room_en.d

3 Purpose

This Decision establishes a harmonised health and safety policy¹ at work for all GSA staff in all GSA workplaces.

The object of such harmonised policy is to introduce minimum standards and measures for the continuous improvement of safety and health at work of GSA staff.

¹ See “health and safety” definition (§ 4(a))

To that end this Decision sets up general principles concerning competences and procedures for the prevention of occupational risks, the protection of safety and health, the elimination of risk and accident factors, the information, consultation, balanced participation and training of GSA staff. This procedure also complies with Council Directive 89/391/EEC. The purpose of the rules is to prevent work related injuries and diseases with primary focus on the prevention, care for good health of staff and for their performance through qualified service, provision of a safe and secured working environment, compliant with EU regulations and best practices in occupational health and safety area.

4 Definition

For the purposes of this Policy, the following definitions shall apply:

- (a) "Health and safety" shall be understood as:
 - a. The prevention of occupational risks, the protection of safety and health, the elimination of risk and accident factors, the information, consultation, balanced participation in accordance with applicable laws and/or practices and training of workers and their representatives, as well as general guidelines for the implementation of the said principles;
 - b. It includes as well necessary measures for first aid, fire-fighting and evacuation of workers, adaptation to the nature of the activities and the size of the undertaking and/or establishment and taking into account other persons present, arrangement of any necessary contacts with external services, particularly as regards first aid, emergency medical care, rescue work and fire-fighting.
- (b) "Workplace" means the place intended to house workstations on the premises of the GSA and any other place within the area of these premises to which the staff has access in the course of their work;
- (c) "Staff" or "staff members": GSA staff to which the Staff Regulations of Officials of the European Union and the Conditions of Employment of other servants of the European Union apply, as well as national experts seconded to GSA;
- (d) "Employees": staff members, seconded national experts and any other external staff incl. interim workers, consultants and trainees;
- (e) "GSA site": all the workplaces occupied by the GSA and its staff while at work as administratively established by the GSA;
- (f) "Health and Safety Rules": detailed provisions for the implementation of the Health and Safety Policy in all GSA sites;
- (g) "Health and Safety Officer" or "GSA HSO": GSA staff member in charge of health and safety throughout the GSA, including for the coordinated implementation of Health and Safety Policy and Rules on all GSA sites, where appropriate with the help of the respective site managers (and possible deputy or local health and safety officers as may be appointed in support of the GSA HSO);
- (h) "Individual Directive": Directive adopted according to Article 16 of Directive 89/391/EEC.
- (i) "Site Managers": Managers referred to in section 6(3).

5 Scope and application

5.1 Legal provisions

1. GSA has a legal personality according to Article 4 of Regulation No 912/2010 as amended by Regulation 512/2014.
2. The European Council directive 89/391/EEC of the 12th June 1989 lays down a minimum legal requirement for the area of health and safety within the EU. GSA has a legal personality according to Article 4 of Regulation No 912/2010, as amended by Regulation 512/2014, but GSA as such is not directly bound by this directive. However, under Article 1e(2) of the Staff Regulations (AD4), the EU staff “shall be accorded working conditions complying with appropriate health and safety standards, at least equivalent to the minimum requirements applicable under measures adopted in these areas pursuant to the Treaties.”
3. Considering the Staff Regulations, the distinctive status of GSA and its permanent or temporary premises and dedicated areas (AD 5,6,7,8), considering as well the way the European Commission has implemented the Council Directive 89/391/EEC (AD2) it has been decided to design GSA harmonised health and safety policy at work using Commission decision 1623 of 21 April 2006 establishing a harmonised policy for health and safety at work for all European Commission staff (AD3) as guideline in all relevant OHS areas.
4. Where, because of specific risks (e.g. external companies conducting work within GSA premises), Community provisions (AD2) and GSA Policy and detailed rules may appear to be insufficient or where GSA operations require a licence issued by national authorities, it is appropriate to make reference to the provisions of the host country legislation and/or the relevant licences.
5. In order to allow swift implementation of this Health and Safety Policy, both in terms of adopting rules and monitoring their application, on the one hand, and applying the rules, on the other, it is appropriate for GSA to delegate its powers; account should be taken of the specific features of different GSA workplaces and of different tasks performed therein; hence, powers should be delegated to designated Site managers according to the different premise or groups of premises under their responsibility. Provision should be made, in the case of sub-delegation of powers, to avoid conflict of interest between the different functions performed.
6. GSA should protect the employees from risks which specifically affect them.

5.2 Applicability

1. This policy applies to all Employees. It applies as well to visitors.
2. In case that a GSA department or site considers that its operational procedures must deviate from the present policy or other related rules, the head of department concerned shall submit a risk assessment to Head of Administration (HOA) demonstrating that it is reasonably justified, because of more stringent local legal requirements or otherwise. Such

deviations require approval by HOA who may delegate the power to grant such an approval to GSA HSO.

3. Specific health and safety rules for some technical fields are defined in attachments to the present policy.

6 Responsibilities: Delegation and sub-delegation of powers

1. Executive Director shall oversee the implementation of this Health and Safety Policy.
2. Head of Administration shall adopt Health and Safety Rules which implement the present Policy at any GSA location.
3. Executive Director hereby delegates the responsibility for ensuring health and safety at GSA premises to the following respective managers, who shall ensure the health and safety in coordination with the GSA Health and Safety Officer (GSA HSO) and other heads of departments:
 - a) GSA HQ: Head of Administration
 - b) GSMC France: Head of GSMC
 - c) EGNOS premises in Toulouse: EGNOS Manager
 - d) GSMC Spain: Site Manager designated by Head of GSMC
 - e) GRC and GSC: Site Manager designated by Galileo Services Programme Manager
 - f) Other GSA remote locations: Site manager designated by Executive Director (hereinafter "Site Managers")
4. The delegation of responsibility should be confirmed by a mandate signed between the Executive Director and the Site Manager. Job description of the Site Managers should be adjusted to include tasks in the field of the implementation of the Health and Safety Policy.
5. For the purpose of fulfilling the delegation of the responsibility, the Site Managers shall at the respective GSA premises *inter alia*:
 - a) implement with all appropriate means the health and safety rules arising from the respective hosting agreement (AD 6 to 9), this Health and Safety Policy, as well as the respective national law;
 - b) ensure the consistent compliance with the health and safety rules arising from the respective hosting agreement (AD 6 to 9), this Health and Safety Policy, as well as the respective national law;
 - c) control the observance, by all the employees of the health and safety rules arising from the respective hosting agreement (AD 6 to 9), this Health and Safety Policy, as well as the respective national law;
 - d) ensure the proper maintenance of the respective GSA premises;
 - e) ensure that the health and safety rules are published and brought to the attention of employees by all appropriate means;



- f) take, in general, precautionary measures to avoid breaching any health and safety rule arising from the respective hosting agreement (AD 6 to 9), this Health and Safety Policy, as well as the respective national law; and
 - g) take, in general, all necessary measures and decisions to condemn a violation of the health and safety rule arising from the respective hosting agreement (AD 6 to 9), this Health and Safety Policy, as well as the respective national law.
6. The responsibility is delegated to the Site Manager with due regard of their authority, as well as their technical and professional skills. The Site Manager shall be empowered with relevant material, technical, financial and human resources, to take all decisions for the implementation of the delegated responsibility. The Site Managers shall verify at any time the adequacy of the resources at their disposal and promptly inform the Executive Director about any potential additional need to fulfil the delegated responsibilities. The Site Manager may seek the assistance of the locally authorised persons and staff, which will provide him with the necessary information and documentation.
 7. Without prejudice to responsibility of Site Managers for health and safety at GSA premises, heads of department and line managers shall contribute to creation of favourable working conditions for staff under their responsibility and ensure compliance of safety and health rules within their departments. Head of department shall inform the Site Manager if he/she discovers that working conditions within his/her department may not comply with legal and internal rules.
 8. The GSA HSO shall keep a list of staff involved in implementation of health and safety policy up to date at all times.
 9. Specific decisions may be taken by the Executive Director, as the case may be, in order to entrust the Site Managers with budgetary autonomy for the sake of implementation of this policy.

7 Policy

The GSA takes occupational health and safety seriously and all employees shall act accordingly, applying all efforts to avoid accidents, prevent injuries, handle or report identified sources of danger in terms of health and safety. Mandatory OHS principles at the GSA are set as follows:

- Safety and health protection is essential.
- All injuries and accidents can be prevented and avoided.
- No work shall be carried out if it cannot be carried out safely.
- All shall serve as model in OHS.
- Risk of danger shall not be ignored.
- In OHS matter, external contractors' employees shall be treated according to the local regulation and with the highest EU standards.

7.1 Health and safety rules

1. The measures to ensure health and safety at work for all employees shall be based on a harmonised system of working conditions for all GSA sites, complying with appropriate health and safety standards at least equivalent to the minimum requirements pursuant to Directive 89/391/EEC, individual Directives and other EU measures adopted in the area of health and safety at work.
2. The Head of Administration may empower local Site Managers to adopt Health and Safety Rules implementing this Health and Safety Policy.
3. Without prejudice to Protocol No 7 on the Privileges and Immunities of the European Union annexed to the Treaties and other relevant international instruments applicable (AD 6,7,8 and any other host agreement), for the purpose of this decision, the Health and Safety Rules may refer to host country legislation according to the GSA site. The competent local or national bodies may be invited to assist to maintain high level of health and safety standards as well as the well-being at the workplace in the GSA's premises.

7.2 Health and safety prevention General Principles

GSA shall implement the measures referred to in 7.1, paragraph 1, on the basis of the following general principles of prevention:

- (a) appointing GSA Health and Safety Officer responsible for the risks at work;
- (b) avoiding risks;
- (c) evaluating the risks which cannot be avoided;
- (d) combating the risks at source;
- (e) adapting the work to the individual, especially as regards the design of work places;
- (f) choice of work equipment and the choice of working methods, with a view, in particular, to alleviate monotonous work and work at a predetermined work-rate and to reduce their effect on health;
- (g) adapting to technical progress;
- (h) replacing the dangerous by the non-dangerous or the less dangerous;
- (i) developing a coherent overall prevention policy which covers, organization of work, working conditions, social relationships and the influence of factors related to the working environment;
- (j) giving priority to collective protective measures over individual protective measures;
- (k) limiting the number of workers exposed to factors exceeding the highest hygienic limits and other risks to the minimum number necessary for work execution;
- (l) giving appropriate instructions to the staff;
- (m) provide consultation for GSA staff on all matters relating to health and safety at work and opportunity to participate on the issue of health and safety at work;
- (n) giving adequate health and safety training to the staff relevant to their job / position.

7.3 Register of legal requirements

1. Legislations, norms, contractual and any other legal requirements shall be identified and recorded in registers of legal requirements.
2. Head of Administration and GSA Site Managers shall identify and analyse – where appropriate with the support of the Legal and Procurement Department – the applicable legal regulations and the requirements arising out of EU regulation, contracts and, when applicable, national or local regulations.
3. Site Managers shall provide the Legal and Procurement Department with their local lists of issued decisions, permissions and authorisations for collection and registration.
4. The Legal and Procurement Department shall provide to Head of Administration and GSA Site Managers an expertise related to creating, maintaining and disseminating the list of issued decisions, permissions and authorisations.
5. GSA Internal Control Coordinator can request access to registers and to the list of issued decisions, permissions and authorisations at any time.

7.3.1 Central Register of legal requirements

1. A central register of legal and other regulations requirements shall be implemented and kept updated at GSA level. This register shall be placed under the authority of the Head of Administration or his/her representative.
2. Head of Administration can enlist an expert external service or person to monitor and keep the Central Register of legal requirements updated. In such case, close supervision and frequent control shall be conducted.
3. The register shall be kept updated on the basis of the outcomes of the monitoring of changes in the legal and other applicable regulations requirements. The monitoring and the updating of the register shall be performed under the following rules:
 - a) monitoring new regulations, changes in the existing relevant legal requirements stated in the register of legal and other requirements;
 - b) informing the managers and other individuals concerned with the change in the legal requirements as necessary;
 - c) updating the internal processes to ensure fulfilment of the legal requirements and compliance therewith in terms of organisation.
4. A template for creating the register can be found in Form 5 and shall be used to keep the overview of applicable legal requirements.
5. The Central Register of legal requirements shall be stored in electronic form in its last valid version.



7.3.2 Local Register of legal requirements

1. A local register of legal and other regulations requirements shall be implemented and kept updated at GSA Site Managers level. This register shall be placed under the authority of the GSA HSO or his/her representatives, if any.
2. GSA Site Managers can enlist an expert external service or person to monitor and keep the local register of legal requirement updated. In such case, close supervision and frequent control shall be conducted.
3. The register shall be kept updated on the basis of the outcomes of the monitoring of changes in the legal and other applicable regulations requirements. The monitoring and the updating of the register shall be performed under the following rules:
 - a) monitoring new regulations, changes in the existing relevant legal requirements stated in the register of legal and other requirements;
 - b) informing the managers and other individuals concerned about the change in the legal requirements as necessary;
 - c) updating the internal processes to ensure fulfilment of the legal requirements and compliance therewith in terms of organisation.
4. A template for creating the register can be found in Form 5 and shall be used to keep the overview of applicable legal requirements.
5. The Local Register of legal requirements shall be stored in electronic form in its last valid version.

7.4 General obligations and responsibilities

The delegation of powers at the different level implies that Site Managers shall comply with OHS obligations. Employees shall as well comply with health and safety obligations to ensure a safe working environment.

7.4.1 Site Managers, Heads of department and line managers

Site Managers, Heads of department and line managers shall respect the following principles of safe work and behaviour in the workplace:

1. Employees are not endangered by falling of objects or materials.
2. Employees are protected from falling from height or collapse.
3. Employees do not perform hazardous work in workplaces alone unless dealing in emergency situations that cannot be delayed and, based on last minute risk assessment, are not dangerous to life, unless agreed by the employees for the specific emergency situation, authorized by their line manager after prior assessment by authorized GSA member staff for OHS affairs. Hazardous work means especially:
 - a) works with increased risk that cannot be done without the supervision of another person, unless protection and control is established otherwise, including:



- Works in confined spaces and other similar narrow or difficult to access locations and devices, and in places where there may be explosive or toxic atmosphere.
 - Works at height when using personal fall protective equipment (safety harness, safety belt) and works on ladders.
 - Works with an open fire where special fire safety measures are prescribed.
 - Works in the danger zone of power lines or works with low proximity to uncovered live parts of electrical equipment, substations and energy generators rooms.
4. Employees do not carry out manual handling of loads that can cause injury of spine.
 5. Heads of department must steer and manage activities and works well organized, coordinated and with implemented safety measures in order to protect employees and also those who are with their knowledge present at GSA's workplaces.
 6. Heads of department must inform their subordinates or other employees appearing with their knowledge at the workplaces about the risks and measures taken. A preventive plan for contractors' safety and mutual exchange of risks under the Article 7.13.1 of this Policy shall be taken into consideration.
 7. In the area of machinery, electrical appliances and technology facilities, the Site Managers must ensure that the machines, technical equipment and tools are effectively suitable for the work that will be done and must also:
 - a) be fitted with protective devices that protect the life and health of employees;
 - b) be regularly and properly maintained, inspected and reviewed.
 8. Site Managers will ensure installing at workplaces of safety signs, markings and signals in case of work that may cause harm. Placement of safety signs and markings shall be done in cooperation with professionals in occupational safety to avoid non systematic approach.
 9. Site Managers shall encourage and educate employees to adhere to the rules and principles of occupational health and safety and create conditions for active employee's participation in addressing issues related to OSH.
 10. Site Managers shall regularly check the level of occupational safety and health at workplaces, in particular the state of workplace equipment, take measures to remove deficiencies and monitor their implementation and effectiveness. Perform safety walks and talks on safety training for managers and focus on explaining to employees the potential consequences when the risks is not minimalized or what might happen in case of breach of the safety rules and regulations.
 11. Site Managers and Heads of department shall ensure that any situation representing an immediate danger to life and health is solved immediately and work is stopped as precautionous.
 12. In case of notifying a serious breach of occupational health and safety rule or presence of a hazardous condition in the workplace, managers should intervene immediately, notify responsible manager or managing employee of an external entity. If necessary, Site Managers, Head of department or line manager shall ensure the cessation of work.

13. Site Managers shall participate in occupational health and safety internal audits and checks, provide necessary assistance and submit the required documents and information.
14. Within the stipulated deadlines Site Managers shall ensure implementation of safety measures in order to address identified weaknesses.
15. Site Managers and Heads of department shall immediately notify GSA HSO or his/her representative if an injury occurs, to proceed according to the respective section of this document dealing with injuries and provide cooperation in the investigation.
16. Site Managers and Heads of department shall inform GSA HSO or his/her representative about a new safety hazard, which is not mentioned in the documentation of risks, and cooperate in its management and setting measures and injury prevention.
17. Site Managers, Heads of department and line managers shall attend trainings in area of occupational safety and health and fire protection, including verification of their knowledge. These trainings must be prioritized and are obligatory.
18. Site Managers at all levels of management within the scope of their functions set out in cooperation with GSA HSO and the HR Department all specialized technical trainings, which staff have to attend with regard to the operation performed.
19. Line managers shall not assign work to employee to perform work which do not correspond to their abilities and competences (technical and medical).
20. Site Managers shall ensure training on occupational health and safety for Employees in accordance with the applicable training curriculum.
21. Site Managers shall create or ensure creation of the necessary operational documentation of activities with significant safety risks or of new technical appliances and infrastructure. (Each device must be equipped with operational documentation. Checks of safe condition is carried out prior to commissioning and then at least every 12 months, unless special legislation or accompanying documentation sets this frequency differently.)
22. Site Managers shall ensure compliance with the ban on smoking except specified outside areas.
23. Site Managers shall notify any suspicion of serious changed health status of Employees to HR Department, restrict temporarily conduction of more risky tasks or equipment and tools activities which are part of their profession.
24. Site Managers shall communicate to Employees new and updated guidelines which ensure safety.
25. Site Managers shall ensure the organization of working hours in accordance with applicable rules.

7.4.2 Employees

The rights and obligations of employees are to be considered accordingly:

1. Employees are entitled to refuse to perform work which is reasonably considered that directly and seriously endangers their safety or health, or the life or health of other individuals.
2. Employees have the right and obligation to participate in creating a safe and healthy working environment, notably by applying a set of measures taken by the employer and their participation in addressing occupational safety and health.
3. Employees have the right to inspect the records, which are kept on them in connection with the provision of occupational health and safety.
4. Employees shall care according to their possibilities about their own safety, their health and the safety and health of individuals who are directly affected by their actions or omissions at work.
5. Employees shall have knowledge of their obligations arising from legal and other regulations to ensure the health and safety at work, which is an integral and permanent part of employee qualification requirements.
6. Employees shall participate in training organized and provided by GSA on occupational safety and health, including verification of their knowledge.
7. Employees shall undergo annual medical examinations specified by applicable EU rules and internal regulations of GSA.
8. Employees shall comply with local legal and other regulations and instructions of the managers to ensure the safety and health at work and follow the principles of the safe behaviour in the workplace and employer information.
9. Employees shall use personal protective equipment and protective devices, never arbitrarily modify them nor drop them out of service, if allocated to activities where the equipment and protective devices are prescribed.
10. Employees shall maintain order and cleanliness in the workplace.
11. Employees shall observe the principles of accident prevention during normal walking and movement on the ground specified in the filled Form 3 - Risk Assessment or Form 4 - Health Risk Assessment.
12. Employees shall not to be at the GSA premises under the influence of alcoholic beverages or any other addictive substances which affect the cognitive capability of the employee;
13. Employees shall not smoke in the workplace except in designated areas and abide to local laws on smoking bans when representing the GSA.
14. Employees shall notify the Head of department, line manager or HOA in case of some failures and deficiencies in the workplace, which endanger or which directly and seriously interfere the safety or health of employees at work, including, but not limited to, the imminent outbreak of an emergency or lack of organizational measures as well as the failure or malfunction of technical equipment and protective systems intended to avoid accidents.
15. Employees shall promptly notify the Head of department about any work injury or work related injury of workers of another employer (external employees), which the employee has witnessed, and shall cooperate in clarifying its causes.



16. Employees shall, without undue delay, notify the Heads of department about facts of compromised health status, if they could have an impact on occupational health and safety (drug use, pregnancy, fatigue, dizziness etc.) and loss of professional competence (e.g. the expiry of the driving license etc.).
17. Employees shall provide assistance to other persons in the GSA premises in case of danger to their life or health, in particular calling for appropriate emergency medical services and providing first aid.
18. Employees shall notify the Heads of department of all the facts that may affect their abilities to perform the job and may affect the safety at work (e.g. a lack of sleep due to the performance of emergency or surveillance in GSMC or other causes of health complications, enabling the performance of the work with certain restrictions, consumption of drugs that can affect safety at work, ability to travel by plane, lack of skills or knowledge to safely perform specified work, etc.).
19. Employees shall be aware of the location of the means used to provide first aid in the workplace.
20. Employees at the reception desk or other employees designated by the Site Manager are obliged to inform the visitors about the risks and measures and instruct them in case of evacuation.
21. Employees who carry out their duties at the GSA site are obliged to:
 - a) enter and move around the premises separately only after the provable familiarization with the actual risks, safety and security measures and clearance, otherwise in other cases only when accompanied and escorted by a competent staff;
 - b) respect safety signs;
 - c) not enter roof or approach edges and unsecured depths and heights in a distance closer than 1.5 meters from edge;
 - d) not enter into the handling area of construction machinery;
 - e) use prescribed PPE.
22. Employees, who leave their workstation and/or a dangerous area in the event of serious and imminent danger, may not be placed at any disadvantage because of their action and must be protected against any harmful consequences. However, employees shall make reasonable efforts to avoid or remove a danger if it does not put in danger the employee himself.

7.4.3 HR Department

HR Department shall:

- (a) ensure that training of employees in area of OHS is organized in collaboration with Site Managers and shall keep copies of documentation on training;
- (b) ensure selection and/or provision of medical services provider;



- (c) keep records (Form 6 and Form 7) of evidence of all relevant professional qualifications and health checks for GSA staff members;
- (d) organize health examinations of staff members and timely inform them about the terms of their expiration;
- (e) notify Site Managers and Heads of department without undue delay about the specific need of GSA staff, medical examinations and all the elements necessary for the safe performance of the work;
- (f) inform the Head of department when a staff member does not attend mandatory medical check-up.

7.4.4 Facility and logistics manager

Facility and logistics manager is responsible for:

- (a) ensuring that GSA facilities meet requirement of safe setup, regular monitoring, inspection and maintenance of all technical equipment, machinery and appliances excluding security and ICT technologies in accordance with instruction manuals, and other laws and other regulations with respect to contractual provisions or lease agreements;
- (b) procuring GSA PPE on request from GSA Site Managers and implementing a procedure for ordering PPE. An external service providing an expertise regarding technical specificities of the PPE might be enlisted. PPE requests are made under the responsibility of GSA Site Managers;
- (c) equipping premises with first aid boxes and maintaining them (see Attachment 2).

7.4.5 Health and safety outsourced service regulation in GSA located countries

1. Head of Administration and Site Managers might hire locally authorised persons to ensure compliance with legal requirements and interests of the operations in their relevant countries. This outsourcing service is the most relevant for local contractors operations, health and safety local compliance and monitoring. Enlisted service or person might fulfil their duties in the area of consultations, co-operation, supervision, inspection and provision of reports in compliance with EU regulation, GSA Health and Safety Policy, local legal regulations and instructions or any other relevant requirements for each GSA site.
2. Head of Administration and GSA Site Managers are responsible for their dedicated health and safety service contracts.
3. Outsourcing of the health and safety compliance and monitoring does not deprive the Site Managers of their responsibility referred to in section 6(2), unless this responsibility is outsourced explicitly and for specific aspects in accordance with applicable rules of the Member State of the GSA sites in question.
4. The enlisted health and safety service or person must comply with the local requirements related to their professional qualifications and experience:

Czech Republic

In the Czech Republic, the requirements on professional competence in the area of health and safety are governed by Sections 9 and 10 of Act No. 309/2006 Coll., as amended.

France

The Site Manager may request support of IPRPs (Intervenants en Prévention des Risques Professionnels) who may be individual people or legal entities, external to the enterprise or belong to the inter-enterprise occupational health service. Their general mission is to participate in the prevention of occupational risks and the improvement of working conditions. To practice their profession, the IPRPs must obtain an authorisation that is granted collegially by the following bodies: CARSATs (Caisses d'Assurance Retraite et de la Santé au Travail, OPPBTP (French Professional Agency for Risk Prevention in Building and Civil Engineering, Organisme Professionnel de Prévention du Bâtiment et des Travaux Publics), and ARACTs (Regional Agencies for Improved Working Conditions, Agences Régionales pour l'Amélioration des Conditions de Travail).

Spain

Please refer to: https://oshwiki.eu/wiki/OSH_system_at_national_level_-_Spain

Belgium

Please refer to: https://oshwiki.eu/wiki/OSH_system_at_national_level_-_Belgium

Netherlands

Please refer to: https://oshwiki.eu/wiki/OSH_system_at_national_level_-_Netherlands

5. Methodological support of certified OHS professional to management means especially:
 - a) informing the competent line management on the requirements of legal and other regulations to ensure health and safety and methodical controlling the application requirements of OHS;
 - b) cooperating with line management of GSA, especially at:
 - search of risks, identify their sources and causes, evaluation, proposing measures to eliminate them,
 - selection of machines, equipment, materials and substances,
 - design, construction and operation of buildings,
 - OHS documentation and processing workflows,
 - selection of personal protective equipment,
 - establishment of measures to remedy identified shortcomings;
 - c) verifying safety rules at work by performing inspections of workplaces and communicating the deficiencies in writing to identified senior management of the audited departments;
 - d) cooperating in clarifying the causes of work-related injuries, performing work injuries analyses and determining proposals for measures to prevent their recurrence;



- e) keeping records of work-related injuries in GSA;
- f) consulting, or otherwise cooperating with managers in areas of corrective measures;
- g) preparing and keeping training documentation of GSA staff;
- h) expressing comments to the content of the agreements with suppliers of works and services in terms of ensuring safety and health at work at the request of the respective senior staff and cooperating in obtaining documents and communication of risk, in the event that there will be at one workplace supplier's employees performing with GSA staff;
- i) evaluating risks and proposing measures to reduce their exposure risks and updated documentation.

7.5 Identification of risks, risk assessment

7.5.1 Head of Administration

1. Head of Administration shall keep OHS documentation up to date and shall collect risk assessment records sent by Site Managers. The Risk Assessment records must contain the retrieved and assessed risks that cannot be removed, including the measures taken to mitigate possible impacts. Until further notice or change of sharing software, this documentation must be stored on SharePoint and printed when required. Head of Administration might designate an occupational health and safety representative to perform the tasks above on his/her behalf.
2. When a special expertise is required, Head of Administration can require advices from external services.

7.5.2 Site Managers

1. Site Managers shall create, implement and maintain processes to identify, assess and eliminate risks on a continuous basis. More detailed risk assessments for respective sites and tasks of employees shall be performed by Site Managers for each site. Site Managers may appoint an external party to do so.
2. Heads of department and line managers can request access to health and safety risk assessments records at any time.
3. Site Managers shall establish, at the latest within 1 year of the date of adoption of this decision, an evaluation of all health and safety risks associated with each staff post in the GSA workplaces under their responsibility. These risk evaluations should be updated at regular intervals in particular for those posts for which significant health and safety risks have been identified in the initial evaluation or for which significant changes have occurred, or for which significant problems have been notified by GSA staff in the relevant GSA workplace.



4. On the basis of this evaluation, Site Managers shall establish and implement a plan with preventive measures in order to:
 - a) assure an improvement in the level of protection afforded to employees with regard to safety and health;
 - b) integrate it into all the activities and at all hierarchical levels.
5. Site Managers shall constantly seek for dangers and monitor working conditions, evaluate risks, determine their causes and sources as well as take measures to eliminate them.
6. In case a risk cannot be avoided or eliminated, Site Managers in collaboration with Head of Administration and other relevant staff shall assess, prioritize and take all required necessary measures to reduce or mitigate the risk and its impact so that the threat to the safety and health of employees is minimized.
7. Before commissioning a new machinery/equipment/IT or security infrastructure into operation, Site Managers must identify risks and ensure that employees are demonstrably informed about them and, at the same time, that the identified risks are put into a risk register.
8. Site Managers shall provide the Head of Administration with relevant and up-to-date local and mandatory OHS documentation and shall keep site risk assessment records. The Risk Assessment records must contain the retrieved and assessed risks that cannot be removed, including the measures taken to mitigate possible impacts. Site Managers might designate an occupational health and safety representative as an appointed staff for OHS affairs to perform the tasks above on their behalf.
9. In the event of exceptional work, Site Managers or their representatives shall ensure the implementation of measures to reduce the risk effects so that the threat to the safety and health of employees is minimized. If sufficient measures cannot be, or are not adopted, the work must be stopped.
10. Site Managers shall acquaint GSA employees with the risks, the risk assessment results and measures to protect them against the effects of those risks that are relevant to their work and workplace.
11. Site Managers shall:
 - a) inform as soon as possible all employees who are, or may be, exposed to serious and imminent danger and of the steps taken or to be taken as regards protection;
 - b) take action and give instructions to enable the employees to stop work and/or immediately to leave the work place and proceed to a place of safety in the event of serious, imminent and unavoidable danger;
 - c) refrain from asking employees to resume work in a working situation where there is still a serious and imminent danger.
12. Site Managers shall ensure that all employees are able to take the appropriate steps as of their knowledge and the technical means at their disposal in the event of serious and imminent danger to their own safety and/or that of other persons. Where the immediate superior responsible cannot be contacted, Site Managers shall ensure that all employees are able to avoid the consequences of such danger.

13. The actions of employees shall not place them at any disadvantage, unless they acted carelessly or there was negligence on their part

7.5.3 Risk identification and assessment

1. Identification and risk assessment shall be conducted separately by the relevant Site Managers for each workplace of GSA and specifically for the activity that is or may be carried out at workplaces of GSA.
2. Risk assessment shall involve all employees, their representatives and any other persons who may be exposed to risk.
3. Risk identification is performed with regard to the following inputs:
 - a) technical documentation;
 - b) records of accidents;
 - c) notification of risks perceived by staff;
 - d) legal and other regulations to ensure the safety and health of employees in accordance with 89/391/EEC;
 - e) any other legal transpositions and subsequent legislation, identified as mandatory or relevant, with respect to the activities performed;
4. In risk identification and assessment, a distinction shall be made between:
 - a) risks related to GSA workplaces;
 - b) activities that are regularly or might be occasionally carried out in workplaces of the GSA.
5. Since GSA outsources most of its technical activities, risk assessments shall involve all employees might implicate other persons who could be exposed to risk, including risks for contractors and measures they have to follow.

Risk assessment methodology

A description of the risk assessment methodology used within organization is a mandatory requirement for the policy.

The GSA risk assessment uses semi-quantitative method as briefly described below.

The methodology does not use for its calculation the occurrence of the consequences but the risk of such occurrence. It is based on the description of each category level of probability, impact and seriousness (a combination of probability and severity).

Methodology		
P - The Probability of the existence and risks		
1	Random	zero incidence, or more than once a year
2	Unlikely	the occurrence once per quarter
3	Likely	monthly incidence



4	Very likely	occurrence weekly
5	Lasting	constant repetition or everyday occurrence
S - The consequences of injury Severity		
1	injuries without incapacity	
2	lost time injury (incapacity for work)	
3	more serious injury requiring hospitalization	
4	heavy accident and injury with lasting effects	
5	Fatality	

Level of risk	R= P x S
0 to 4	insignificant risk
5 to 9	acceptable risk
10 to 14	moderate risk
15 to 19	adverse risk
20 to 25	unacceptable risk

Characteristics of risks according to the intervals of their index point values

Insignificant Risk > Countermeasures need not be implemented. It is reduction can be implemented for countermeasures, which cost-benefit analysis demonstrates, if benefits outweigh the costs. Risk must be constantly monitored.

Acceptable Risk > Countermeasures need not be implemented. It is reduction can be implemented for countermeasures, which cost-benefit analysis demonstrates, if benefits outweigh the costs. Risk must be constantly monitored.

Moderate Risk > Another countermeasures need not be implemented. It is however recommended to propose measures to reduce the risks and implement the one for which cost-benefit analysis demonstrates, if benefits outweigh the costs. Possibly multi-criterial analysis the overall profitability of countermeasures. Risk should be monitored permanently.

Adverse Risk > It is necessary to take countermeasures activity or immediately implement countermeasures by a certain deadline. Activity without risk reduction can be operated only if it is the socially highly significant (chemical industry and the production of certain hazardous compounds). Cost of risk reduction should be proportional to the value of the protected assets. Again, it is recommended to use the cost-benefit analysis and multi-criterial analysis to assess the efficiency of the adoption of specific countermeasures.

Unacceptable Risk > It is necessary to stop the activity or immediately implement countermeasures aimed at its minimization.

Note: This methodology describes likelihood of a random hazardous event and its occurrence. We measure how often something unwanted may happen (like slip or trip on stairs). This frequency is multiplied by factor of usual severity if it results to an injury. However, not every occurrence results to an injury, the ratio is usually 1 injury per 6000 occurrences of near misses which might have an expected consequence. Frequency is what happens in reality, but consequences happens in average in ratio 1:6000.

7.6 Implementation of health and safety rules

1. Site Managers shall designate within their line of management one or more staff members to carry out the activities related to the practical implementation of the Health and Safety rules.
2. Site Managers may in addition enlist competent external services or persons.
3. Each designated officer appointed for practical implementation, enlisted external service or person shall be known to HOA.
4. The Health and Safety rules shall define the necessary capabilities and aptitudes to carry out the activities referred to in paragraph 1.

7.7 Communication

1. Communication channels for internal communication are created in GSA. These communication channels are used as appropriate:
 - a) meetings of departments;
 - b) Intranet systems;
 - c) periodicals issued by the GSA;
 - d) training;
 - e) individual meetings and instructions;
 - f) notice boards and other communication areas in common spaces;
 - g) mail messages and e-mails.
2. The internal communication towards the GSA HQ in the event of serious events having impact on OHS takes place as follows: report to the Head of Administration (HOA) with copy to (Facility and Logistics Manager immediately after the event has occurred.
3. Serious events are deemed to be especially the following:
 - a) injuries resulting in death, heavy injury, mass injuries, injuries with loss of limbs;
 - b) events influencing public opinion (e.g. regional or nation-wide media, etc.).
4. The above events do not affect the process of reporting occupational injuries described in the Health and Safety Rules or reporting serious emergency and crisis situations taking place at GSA and specified in other internal management documentation.



7.8 Information for Employees

1. Site Managers shall take necessary measures so that employees receive appropriate information concerning:
 - a) the safety and health risks as well as protective and preventive measures and activities, in general as well as for each type of workstation and/or activity;
 - b) the measures taken pursuant to first aid, fire-fighting and evacuation of Employees.
2. Site Managers shall take necessary measures so that designated staff members and the staff representatives with specific responsibility for the safety and health at work shall have access to:
 - a) the risk evaluation and protective measures;
 - b) all the information yielded by protective and preventive measures, auditing entities and consulted national inspection bodies.
3. Companies contracted to carry out works or bring external personnel into GSA premises shall receive the necessary information on health and safety rules applicable to the site, as well as the information referred to in paragraph 1 and shall pass it on to their workers.
4. Site Managers shall be responsible for providing such information. Where several external undertakings share a workplace, the concerned Site Managers shall foresee the adequate coordination of their activities as regards the prevention of occupational risks.
5. The GSA Security Officer (e.g. LSO) is responsible in the area of OHS. The GSA Security Officer shall ensure that the security guards company will monitor all contractors and visitors engaged in potentially dangerous activities. The GSA Security Officer shall notify responsible GSA staff about visible occupational risks and may stop the work if he/she considers that the work will not be carried out safely. The GSA Security Officer sets a schedule of repetitive safety walks conducted by the security company and aimed at searching for risks as well as at intervening immediately if necessary or notifying the responsible GSA staff.

7.9 Consultation and participation of staff

1. Consultation of GSA staff on all matters relating to health and safety at work shall be undertaken with GSA staff committee.
2. This presupposes:
 - a) appropriate consultations;
 - b) the right to make proposals;
 - c) balanced participation in accordance with health and safety rules and practices.
3. GSA staff representatives with specific responsibility for the safety and health shall have the right to ask the Site Managers to take appropriate measures and to submit proposals to Site Managers in order to mitigate hazards for employees and/or to remove sources of danger.

4. Without prejudice to Article 90 of the Staff Regulations, any member of GSA staff and/or their representatives is entitled to appeal, in accordance with the Health and Safety Rules, to the HOA or his/her representative, if any, if they consider that the measures taken and the means employed are inadequate for the purposes of ensuring safety and health at work.
5. GSA staff representatives must be given the opportunity to submit their observations during audits conducted by appointed external consultant or staff.

7.10 Induction health and safety training

1. Newly recruited staff must be familiarized basic rules of safety and security at the GSA workplace on the first date when they start to work, otherwise must be escorted or under surveillance of the staff.
2. Induction training organised by GSA HR department shall include Health and Safety together with Fire and Evacuation training.
3. HR Department shall coordinate the training with Site Managers and Heads of department.
4. Site Managers shall take implementation rules to make sure that newcomers' benefit of a familiarization session related to their direct work environment conducted by their line manager. This awareness session shall include: work-related risks, the results of risk assessment and measures to be taken against the effects of these risks related to the newcomer position and workplace.
5. Site Managers shall take implementation rules to make sure that line managers take appropriate measures to ensure the familiarization of newcomers or newly assigned staff members with the manufacturers' instructions for using PPE, instructions and guidelines for operation and maintenance of equipment, technological procedures, local operating rules, nearest means of fire protection etc.
6. Trainings shall be carried out according to training curricula and signed by tutor and staff. When achieved, line managers or tutor shall send the training sheet filled and signed by both parties to GSA HR department.
7. GSA HR Department shall retain records of trainings in the personnel file of the staff members.

7.10.1 Periodic OHS training of employees

Periodic training of employees shall take place every two years. This training shall be monitored by Site Managers and carried out following sites implementation procedure.

7.10.2 First aid training

1. Site Managers must ensure that first aid response can be performed at any time. First aid responders shall be certified, trained, drilled and evaluated on a frequent basis. They shall

be nominated and scheduled in order to cover GSA working hours. GSA staff or contracted Security Company's Security Guards can be nominated as first aid responder.

2. In addition, Site Managers can nominate several employees at each site that will be trained by skilled professional to provide basic first aid in case of emergencies. These employees will be trained according to national regulations. HSO is responsible of the tracking of trainings validity expiration. Trained staff agrees that their name will be known to other colleagues and they may be asked and called to assist and help with rescue in emergency situation. This role is honorary, corresponds with basic civil obligation and doesn't create any entitlement for award or monetary compensation.

7.11 First aid, Fire Fighting and evacuation of workers

1. Site Managers shall:
 - a) take the necessary measures for first aid, fire-fighting and evacuation of workers, adapted to the nature of the activities performed and taking into account other persons present;
 - b) arrange any necessary contacts with external services, particularly as regards first aid, emergency medical care, rescue work and fire-fighting.
2. Pursuant to paragraph 1, the Site Managers shall, inter alia, designate the workers required to implement measures for first aid, fire-fighting and the evacuation of Staff. The number of such workers, their training and the equipment available to them shall be adequate, taking account the size and/or specific hazards of the locations.
3. First aid, fire-fighting and the evacuation of employees might be performed by external services or persons under the Site Managers or their representatives. All measures taken shall be compliant with GSA Fire and evacuation procedure within GSA-FML-FM-POL-245038 - Fire Protection Rules and subsequent documentation.

7.12 Principles of allocation of personal protective equipment (PPE)

1. Personal protective equipment is designed and given to employees to protect them against risks that could jeopardize their life, safety or health during their work.
2. GSA provides PPE if it is not possible to avoid the risk sufficiently by technical, organizational or other measures. GSA shall prioritize collective protective measures over individual protective measures.
3. Site Managers may provide the protective equipment that meets specified requirements such as a declaration of conformity. PPE is provided to employees free of charge, according to a risk assessment only to specific activities (see Attachment 1). Except electrical substation room, battery rooms and IT server room GSA does not set any areas of obligatory preventive use of PPE.

4. This list of activities requiring the PPE is set by Site Managers and checked by external advisors, if found appropriate, and validated by the Head of Administration. Specific requirements shall be provided to employees with the PPE in relation to the risks listed in Form 1 at § 2.

7.12.1 PPE stated by provisions of risk exchange with contractors and other workplaces of other entities

1. In case that GSA staff is about to visit a site of contractor or other entity, the other entity shall notify in advance all demands for equipping GSA staff by PPE, otherwise must provide the PPE for the purpose of short visit at site.
2. Hygienic rules shall be followed by GSA staff (clean ESD garments, hygienic cap for helmets or socks for safety shoes, earplugs for instant use etc.)
3. When using different kinds of PPE, these must be compatible. The PPE must be adapted to the physical condition of each staff member staff member, must respect the ergonomic requirements and workers' health.
4. If travelling to an external site, GSA staff shall make sure in advance that safety measures and PPE details are arranged. In case of issuing the PPE, they shall report it to their health and GSA HSO in accordance with local OHS implementing rules.

7.12.2 Change management and impact to staff protection

In case of introduction of new technologies, the emergence of new or worsening existing working and sanitary conditions, Site Managers are responsible for getting a new risk assessment.

7.12.3 Responsibilities and authorities in PPE management

1. GSA HSO is required to implement measures to ensure that the staff has appropriate protective clothing's replacement in case of damage, pollution or loss (if necessary, employees will be assigned with min. 2 sets of protective clothing). This provision does not apply to professions where a significant damage and contamination of clothes is not expected and when absence of PPE for several days (when cleaning clothing) is admissible without a significant reduction in activity.
2. GSA HSO shall implement the procedure attached to the present policy for:
 - a) equipping GSA staff with relevant PPE, before the start of the activities for which PPE should be used;
 - b) controlling the proper use of PPE by GSA staff assigned to the specified activities;
 - c) principles of economic efficiency in the provision of PPE;
 - d) explaining the maintenance and instruction of the proper use of assigned PPE to GSA Staff;
 - e) ensuring that PPE remains in usable condition.
3. Staff is responsible for:

- a) maintaining the assigned PPE properly in order to protect it from loss, misuse and damage;
- b) using only PPE allocated to the activities for which they have been assigned.

7.12.4 Management of PPE

PPE must be registered in Form 1 (§ 2) as evidence that it was given to staff.

GSA HSO shall implement procedures to provide a replacement or new PPE when the former one is not usable anymore, even if this was the result of negligence, intentional or wrongful use. PPE is to be discarded immediately upon finding that it has lost its protective properties or if it is no longer effective enough against risks.

7.13 Medical surveillance and occupational health prevention

1. HR Department shall take the appropriate arrangement with European Commission, Medical Service and/or external medical services or person to ensure medical surveillance and occupational health prevention. These arrangements must comply with medical secrecy and personal data protection rules.
2. All GSA staff under an identified health and safety risk shall receive medical surveillance at regular intervals, appropriate to the degree of health and safety risks to which they are exposed to in their workplace, as identified by the health and safety evaluation of the environment. The details of this surveillance will be indicated in the GSA's Health and Safety Rules.
3. GSA Human Resources shall cooperate actively with the GSA HSO in order to ensure medical preventive surveillance in the workplaces. Site Managers may consult the Human Resources in order to get a health assessment of the environment in the course of carrying out their prevention tasks. European Commission, Medical Services and/or external medical services or persons shall have access to the results of the performed evaluations of risks and the consequent prevention plans.

7.14 Specific risk groups

1. When selecting buildings for accommodating GSA services and when planning the renovation of occupied buildings, the accessibility of premises for persons with reduced mobility shall be evaluated in accordance with the GSA's Health and Safety Rules and in compliance with the building regulations of the host country.
2. For buildings already occupied by GSA at the moment of entry into force of this policy, the situation shall be evaluated at the latest within 3 months.
3. The particular situation of specific workplaces may need to be evaluated individually by the respective GSA HSO in consultation with the GSA Human Resources' enlisted Medical Service, in order to adapt them for specific permanent or temporary needs of members of staff.

7.15 Reporting

1. Each Site Manager shall submit an annual Health and Safety Report on the site(s) under their responsibility to the Executive Director, sending a copy of this report to Head of Administration, and the GSA staff committee.
2. The reporting period starts upon the adoption of the Health and Safety Rules of the site in question. The Head of Administration advised by safety consultant or appointed staff shall define the standardised reporting format to be used to this end. These Reports shall be presented by 31 March of the year following the year to which they refer. For GSMC, reporting on health and safety measures using the standardised format is to be integrated in their Annual Activity Reports submitted to their respective Management Committees.
3. Head of Administration advised by external consultant or appointed staff, on the basis of the Health and Safety Reports mentioned in paragraph 1, shall draft the Annual Health and Safety Report by 30 April of the year following the year to which it refers.

7.16 System of compliance inspections, measurement and verification

The performance in the area of OHS in GSA are monitored on a regular basis by GSA HSO:

- (a) internal audits;
- (b) OHS and fire safety inspections.

7.16.1 Internal audits and OHS inspections

1. The process, competences and responsibilities for planning and performing internal audits of OHS, reporting of the results thereof and the implementation and monitoring of corrective measures are described in the separate Guideline Internal Audit GEN_PRO_GSA_OED_205628.
2. The process, competences and responsibilities for planning and performing OHS inspections by GSA OHS audit and control manager, reporting of the results thereof and the implementation and monitoring of corrective measures may differ but generally must meet following rules:
 - a) OHS inspections by GSA OHS audit and control manager must be organised in cooperation with facility, security and HR officers at least once a year.
 - b) OHS audit and control manager shall lead the inspection. In case of unavailability, he/she must be represented by a mandated OHS professional.
 - c) The objective of the inspection is to perform a screening of the status of occupational safety and health for all sites and facilities.
 - d) Report of this inspection shall be submitted to the concerned Head of Administration and to the GSA Executive Director.
3. The object of the OHS inspection is:
 - a) the workplace's safety and design;



- b) the technical safety of operated devices/revisions, inspection, controls;
 - c) the training and health competences of staff;
 - d) the documentation – Att. 3 of Local operational procedure for Prague HQ.
4. Technical matters shall be inspected in cooperation with relevant responsible staff (e.g. warehouses, archives, low traffic spaces and rooms, areas for contractors).

7.17 Investigation of causes of accidents with injuries and deaths

GSA must implement and maintain uniform processes for recording, investigating and analysing incidents having impact on OHS. The issue of occupational injuries, reporting and investigation thereof and adopting corrective measures is described further.

7.17.1 Accidents at work, reporting, investigating causes and prevention of reoccurrence

1. Work-related injury means any injury or death of an employee caused by a violent act or any external event beyond the control of the employee arising from, or in a direct connection with, performing work tasks.
2. Health damage includes physical and mental injuries as well as material and non-material damages.
3. To determine whether an employee was performing work tasks, the motive or incentive is not decisive, but whether the conduct of employees in terms of content and time was objectively done for the employer (GSA).
4. Investigation must be conducted by GSA HSO to assess if the event that caused a work-related injury:
 - a) happened during working hours;
 - b) arose out of work performed in the course and the scope of employment;
 - c) resulted in bodily harm;
 - d) had a causal link with the harm.
5. GSA OHS audit and control manager can be assisted in the investigation by an internal or contracted expert or any relevant person.

7.17.2 Injuries on missions and during travelling

1. In order to decide whether an injury or illness is work-related when the staff member is on travel status at the time the injury or illness occurs, it must be decided whether the staff member was engaged in performance of tasks. This is in principle the case when the staff member is on approved mission.

2. If GSA staff takes a detour for personal reasons during mission, injuries or illnesses caused during a detour are not considered work-related. This might affect all detours that occur from a reasonably direct route of traveling.

7.17.3 Evidence of injuries and injury logbook

1. All injuries shall be recorded in a logbook even when they did not cause incapacity or incapacity shorter than 3 calendar days (89/391/EEC). All records about injuries must be complete and shall include all the information needed to further actions regarding injury consequences if the health status of affected staff would be deteriorating.
2. Site Managers shall open, under their responsibility, a local log book for each site they are responsible for.
3. GSA OHS audit and control managers shall open, under their responsibility, a central log book and shall compile a copy of all injuries recorded in local injury logbooks.
4. In case of accident, the direct line manager, or an authorized employee, with the knowledge of the HOA shall report without undue delay the injury to the HR Department and to GSA HSO to record it. Line managers in cooperation with the appointed investigator shall examine the injury storyline and legitimacy as a work accident.

7.17.4 Record of accident

1. In case a work-related injury results in the employee's death or incapacity to work for more than three calendar days, an injury report, as indicated in Form 8, shall be drawn up.
2. Medical examination is needed to verify the extent of the accident and setting the reimbursement coverage. Refer to:

https://myintracomm.ec.testa.eu/hr_admin/en/sickness_insurance/pages/form.aspx

3. The following forms will be used for compensations:
 - a) Accident form;
 - b) Accident follow up;
 - c) Accident re-opening;
 - d) Occupational disease.

7.17.5 Procedure for an occupational work related injury

1. Employees who have witnessed a work related injury shall provide first aid to the affected person and, with respect to the severity of the work related injury, shall ensure medical examination or call for an ambulance.
2. Employees are obliged to notify their direct superior about the work-related injury if their health condition does not allow them or another colleague to continue the work. Employees are also required to report work-related injuries that might in the future require medical treatment, although it seems to be only a minor injury.

3. Direct superior shall demonstrably inform GSA employees about any occupational accident without undue delay.
4. The work-related injury that happens to an employee of another employer at the premises of GSA must be communicated by the Site Manager without undue delay to GSA staff who is responsible for the services of the external entity. Such GSA staff member shall participate in investigating the causes and circumstances of accident. Record of the injury suffered by a third party shall be kept by the GSA HR department as an evidence. Also the employer shall keep a record of the injury according to local applicable law and GSA staff must provide required cooperation.
5. Clarification of the causes and circumstances of an accident at work is provided by the witnesses and affected employees immediately after notification to the direct superior. Employees witnessing the accident shall take pictures and notice all witnesses when possible. To ensure proper investigation, OHS authorized professionals shall be called to participate and lead the investigation. Form 9 shall be used to complete the investigation and set measures.
6. In case of a work-related injury resulting in the employee's fatality, staff members must be immediately informed that state police be called to investigate the case. Territorially competent department of the Police in any EU Member State will indicate whether a crime has been committed in the context of a work injury or not.
7. In the event of incapacity caused by a work-related injury, the HR Department shall be informed by the affected employee in the same way as in case of illness or personal injury.
8. The affected employees and the witnesses to a work related injury shall truthfully provide all necessary information about the causes and circumstances of the accident at work and fill in all documents from JSIS. Refer to:

https://myintracomm.ec.testa.eu/hr_admin/en/sickness_insurance/pages/form.aspx

9. Based on the identified causes and circumstances of a work related injury, the Site Managers shall take action against its repetition, i.e. technical, organizational arrangements, and give instructions on occupational accident to staff.
10. In case a work related injury happens outside GSA premises, it is necessary to provide a proof (e.g. witnesses of injury) that the injury occurred while performing work duties or in direct connection with them.

7.17.6 Reimbursement

The reimbursement of accident-related medical expenses will follow the Commission Decision laying down general implementing provisions for the reimbursement of medical expenses.

7.17.7 Damages compensations

GSA shall provide compensation as laid down in the Staff Regulations to staff members who suffered from an injury at work or are affected by the occupational disease.



7.18 Review of OHS system performed by the management

1. The present policy should be reviewed annually with the view to ensure its effectiveness and up-to-datedness. The review performed shall cover the entire scope of the health and safety area at the GSA and it provides the Executive Director with necessary information to set the further process. There are two levels of the reviews: (i) the interview taking place on a quarterly basis with HR Department and HSO and (ii) the one taking place on a yearly basis as a part of ISO 9001 review. The subject matter of the quarterly reviews done by HSO the HOA is the following:
 - a) the state of achievement of the compliance in area of safety and fire safety;
 - b) the state of the investigation of occupational injuries, fulfilment of corrective measures.
2. The subject matter of the yearly review of top management is especially the following:
 - a) opportunities for improvement and higher effectiveness of the system;
 - b) the OHS Policy and up-to-datedness thereof;
 - c) targets for the following period, achievement of the existing targets and target values;
 - d) assessment of compliance with legal and other requirements, changes therein;
 - e) assessment of OHS internal audits and inspections;
 - f) assessment of the communication and complaints, if any.

7.19 Contractor management

The objective of the GSA is to assume a high degree of responsibility for safety and health protection of the employees of contractors who perform GSA's orders.

The OHS requirements during the relationship with the contractor are communicated to him to ensure Occupational Health & Safety (OHS), Environmental Protection (EP) and Fire Prevention (FP) (hereinafter referred to as the "Business Conditions").

Before the performance of any order is commenced, the responsible line manager (usually IT or facility manager) ensures that the contractor's employees carrying out work on workplaces of any site are sufficiently and reasonably informed of OHS, risks related to the work and adopted measures prior to commencing the work. The process is described in detail in the Attachment 3 (§ 2) for GSMS/PRG HQ. For PRG HQ use Form 10 (§ 2).

7.20 Information on risks and coordination of actions with other employers

Where there are performed activities of more than one employer at one workplace, then both employers shall mutually inform each other in writing about the risks of their activities and measures taken in the area of health and safety at work. Both employers must cooperate in ensuring the health and safety at work for all employees at the workplace. This rule applies in all Member States where responsible staff must adhere to local regulation.



If there is no coordination in the implementation of measures in the area of safety and health at work, then the Head of department is authorized to sign an agreement of such coordination with another employer – contractor in this case. A staff member who is entitled to coordinate OSH affairs of external entity must be authorized by line manager.

Line managers shall ensure that the activities and work of subordinate employees were organized, coordinated and implemented simultaneously in order to protect employees of another employer and shall adequately and promptly inform employees about the risks and the measures taken and received from other employers and prepare a record of training, if appropriate.

Each GSA operational department shall create forms and rules for local Operational Safety Procedure.

Safety briefing of visitors staying consciously at GSA workplaces or areas that are not otherwise publicly available must be carried out by visited staff or a line manager which escort visitors, highlighting the basic rules of safe behaviour and any other workplace risks and require compliance with it.

7.20.1 Construction Sites

If the GSA is a sponsor of construction of a larger extent, responsible line manager must adhere to local legal regulations and deliver a notice of commencement of work to regional authorities before handing over the site by the contractor. This obligation may be ensured by an external body with power of attorney.

If on-site works are performed, including any activity that exposes an individual to an increased danger to life or health, a safety plan according to local laws must be set. If it is required by local regulations, a safety coordinator on site shall be appointed by GSA in stage of preparation. The coordinator shall be a professionally qualified individual to perform specified activities in preparation of construction or during construction at the site. The coordinator shall not be the same person who professionally leads the construction.

8 Final provisions

1. This Occupational Health and Safety Policy can be amended by the Head of Administration after consultation of GSA staff committee.
2. This decision shall enter into force on the day following its adoption.

Done at Prague,
The
GSA Executive director

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