



Abu Dhabi Occupational Safety and Health System Framework (ADOSH-SF)

Mechanisms

Mechanism 3.0 - Identification, Assessment and Nomination of Entities

Version 4.0

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1. Introduction

This mechanism is designed to define the standard processes for Sector Regulatory Authorities (SRA's) in identifying, classifying and nominating or notifying the entities within their concerned Sectors.

This mechanism includes the key SRA requirements of:

- *Identifying entities to be included in their concerned sector under the ADOSH-SF*
- *assessing the risk level of sector entities to classify them in terms of OSH management requirements;*
- *identifying entities to be nominated to develop a fully compliant OSHMS within their concerned Sector*
- *identifying entities to be notified to comply with the medium risk entity requirements within their concerned Sector;*
- *identifying and notifying entities classified as low risk within their concerned Sector; and*
- *gaining official approval from ADPHC to notify or nominate specific entities within their concerned Sectors.*

This mechanism has been designed to ensure fair, transparent and consistent implementation of the *ADOSH-SF*.

2. Identification, Nomination and Notification of Entities

- (a) Each SRA shall develop, document, implement and maintain a procedure for the identification, risk classification, nomination or notification and registration of entities that are operating within their sector.
- (b) The identification, assessment and nomination / notification process is shown in Appendix 1.

2.1 Sector Regulatory Authority Entity Identification Process

- (a) Each concerned SRA shall identify entities known to be licensed and operating within their concerned sector.
- (b) Each SRA shall then undertake a risk classification, using the criteria set within Section 2.3 of this document to determine the risk ranking of the identified entity.
- (c) For entities that have been identified as having multiple activities across different sectors, the process set within section 2.2 of this document shall be used to identify the sector that the entity should be nominated / notified within.

2.2 Identification of Entities with Multi Activities

- (a) The following aspects and process shall be considered when identifying entities that have multi activities.

2.2.1 Aspects to be considered for identification of Entities with Multi Activities

- (a) Trade License: In the case of entities having similar names (e.g., if belonging to the same owner) but operating through separate trade licenses (i.e., each has its own legal identity), each entity must be nominated / notified by the SRA relevant to its primary activity that is stated in its trade license and subject to the *ADOSH-SF*.
- (b) Other Licenses: Ideally, the entity must be nominated / notified by the SRA having legal power on the entity's operations (i.e., can withdraw the entity's operational license if needed, with consequent withdrawal of its trade license).
- (c) Main activity: The entity must be nominated / notified by the SRA that can best regulate its main primary operational activities subject to the *ADOSH-SF* and to assess and manage risks from such activities (regardless of the other activities that may appear on its trade license) since risk management is a founding principle of the *ADOSH-SF*.

2.2.2 Process for Identifying Entities with Multi-Activities

- (a) In case the entity has multiple activities listed on its trade license and these activities may fall under more than one SRA, the SRA should identify the main activity(s) of the entity that are subject to the *ADOSH-SF* by using *ADOSH-SF - Form A1 - Identification of Entity Main Operation Activity*.
- (b) The SRA shall nominate / notify the entity within its sector if its main operational activities fall under the SRA, as per *ADOSH-SF* requirements (regardless of the other activities that may appear on its trade license).
- (c) When there are several main operational activities that are overlapping with other sector/s, the SRA shall raise the issue to ADPHC for consideration, along with a completed *ADOSH-SF - Form A1*.
- (d) ADPHC will call for a meeting with all concerned SRAs to agree on the sector that will nominate / notify the entity, within a maximum time frame of two weeks from receiving a duly filled *OSHD-SF - Form A1*.
- (e) Following that ADPHC will approve the identification within a specific sector and inform other related SRAs by sending a signed copy of *ADOSH-SF - Form A1*.

2.3 Entity Risk Classification Process

- (a) Each Sector Regulatory Authority shall perform a risk classification exercise on entities that have been identified within its concerned sector. The risk classification process shall be documented.
- (b) The entity risk classification process shall be approved by ADPHC and include the following as a minimum:
 - (i) complexity / nature and frequency of operations and activities performed;
 - (ii) number of employees;
 - (iii) contractor Management - use of contractors to undertake high risk activities;
 - (iv) use, storage and/or emission of hazardous materials; and
 - (v) proximity to residential or sensitive communities (schools, hospitals, etc.).

Note: refer to section 2.11 for additional requirements related to Major Hazard Facilities.

Note: the SRA has the authority to set the risk classification of its entities.

- (c) Each SRA shall review the entity risk classification process at least every three years. The review of the classification process shall be documented.

2.4 Entity Risk Classification Outcomes

- (a) Each SRA shall classify entities identified within its concerned sector based upon the process described in section 2.3 of this document.
- (b) The risk classification outcome shall be:
 - (i) **High Risk:** If an entity is classified as a High Risk Entity it shall:
 1. develop a full OSH MS in compliance with the requirements of the *ADOSH-SF* and submit it for the concerned SRA for approval.
 2. Employ, as a minimum, one OSH Senior Practitioner as defined by *ADOSH-SF - Mechanism 7.0 -Occupational Safety and Health Practitioner and Service Provider Registration*.
 - (ii) **Medium Risk:** If an entity is classified as a Medium Risk Entity it shall:
 1. implement the requirements of *ADOSH-SF - Mechanism 5.0 - OSH Requirements for Medium Risk Entities*.
 2. If over 100 persons are employed by the entity, they shall employ, as a minimum, one OSH General Practitioner as defined by *ADOSH-SF - Mechanism 7.0 -Occupational Safety and Health Practitioner and Service Provider Registration*.
 - (iii) **Low Risk:** If an entity is classified as a Low Risk Entity, it will be monitored by the SRA in line with the requirements of section 2.7.3 of this document.
- (c) All entities regardless of the risk classification assigned, shall comply with the mandatory technical requirements specified within the *ADOSH-SF - Codes of Practice* that are applicable to their activities / business undertakings.

Note: SRA's may request entities to comply with additional requirements related to their activities as per their innate power as a competent authority within their field.

- (d) Each SRA shall review the risk classification assigned to its entities at least every three years.

2.5 Entity Approval

- (a) Each concerned SRA shall identify entities to be nominated or notified for development and implementation of *ADOSH-SF* requirements under their Sector, based upon the risk classification process described in sections 2.3 & 2.4 of this document.
- (b) An entity must demonstrate a certain minimum level of risk within its sector for it to be targeted for control under the *ADOSH-SF*.
- (c) Each concerned SRA shall officially submit proposed entity nominations or notifications to ADPHC for assessment and approval prior to informing the entity of the requirements to comply with *ADOSH-SF*.
- (d) The decision of ADPHC shall be final with regards to the approval of entity nomination or notification.

- (e) The SRA shall notify ADPHC of any changes to the list of nominated / notified entities (e.g. those that cease trading or operation).

2.6 Sector Regulatory Authority Entity Register.

- (a) Each concerned SRA shall develop, document, implement and maintain a register of all its identified entities.
- (b) Identified entities are those that have been classified for risk as per the requirements of sections 2.3 & 2.4 of this document.
- (c) The register shall contain the following information as a minimum:
 - (i) entity name;
 - (ii) main undertaking;
 - (iii) single disciplinary or multi-disciplinary (if identified as Multi Activity Entity, the register shall also contain information regarding other operating criteria);
 - (iv) risk classification - High, Medium or Low;
 - (v) stage of registration (OSHMS approved / Under development); and
 - (vi) entity classification code (as per the classification codes proposed by the concerned SRA and approved by ADPHC) and registration number.

2.7 Nomination or Notification of Entities Process

2.7.1 Nomination and Registration of High Risk Entities

- (a) Entities that have been classified as high risk shall be nominated to develop, implement and maintain an operational OSH MS to manage the OSH hazards and risks of their operations in compliance with the *ADOSH-SF*.
Note: refer to section 2.11 for additional requirements related to Major Hazard Facilities.
- (b) The concerned SRA shall officially inform the subject entity and provide it with a copy of *ADOSH-SF - Form A*. The entity shall be required to complete Form A and register with the SRA to develop an OSHMS in compliance with the requirements of the *ADOSH-SF*.
- (c) The concerned SRA shall set the entity a timescale to complete the registration and return *ADOSH-SF- Form A*, this timescale shall be no longer than 30 calendar days.
- (d) *ADOSH-SF - Form B* is to be used to update or modify the nominated entity's information, including proposed changes to OSH MS development and implementation timelines.

2.7.2 Notification of Medium Risk Entities

- (a) The concerned SRA shall officially notify an entity that has been classified as medium risk of the requirement to comply with *ADOSH-SF - Mechanism 5.0 - OSH Requirements for Medium Risk Entities*.
- (b) The concerned SRA shall perform an OSH compliance inspection within 6 months of notification to ensure compliance. The concerned SRA shall record the outcome of the inspection (e.g. Inspection Checklist).

- (c) Following the initial inspection, the concerned SRA shall ensure that at least one OSH inspection is undertaken on the entity's undertakings every three years.
- (d) The concerned SRA may increase the frequency of OSH inspections based on risk assessment, including analysis of the entity's Occupational Injury Register, and any submitted serious incidents as per the requirements of *ADOSH-SF - Mechanism 11.0 - Incident Notification, Investigation and Reporting*.
- (e) The concerned SRA can at any time re-assess an entity and update their compliance requirements.

2.7.3 Notification of Low Risk Entities

- (a) The concerned SRA shall officially notify an entity that has been classified as low risk under the requirement of the ADOSH-SF.
- (b) Entities that have been classified by the concerned SRA as low risk, shall be managed by the concerned SRA in a manner relevant to their risk and operation.
- (c) The concerned SRA shall ensure that at least one OSH inspection is undertaken on the entity's undertakings every three years.
- (d) The concerned SRA shall undertake investigations, in line with the requirements of *ADOSH-SF - Mechanism 11.0 - Incident Notification, Investigation and Reporting*, when a fatality is notified to them by a low risk entity.
- (e) SRA's shall ensure that low risk entities are given adequate support, assistance and advice as required to enable them to comply with the requirements set by the SRA, including through attendance at SRA organized events, training, workshops and seminars and release of awareness material.

2.8 Timeframes for Compliance

- (a) The SRA shall set each nominated entity a timescale for the development of their OSH MS.
- (b) In setting timeframes for nominated entities, concerned SRA's shall consider:
 - (i) level of risk and complexity / nature of operations and activities performed;
 - (ii) existing internal OSH resources;
 - (iii) existing level of "OSH Systems / Processes" (e.g. ISO accreditations); and
 - (iv) SRA's internal OSH resources.
- (c) Maximum timeframes for entities classified as high risk include:
 - (i) Development of OSH MS: a maximum of 12 months from official nomination date, however, SRAs may set a shorter timeframe if deemed appropriate;
 - (ii) Implementation of OSH MS: to start implementation within one month from date of official OSH MS approval by the SRA;
 - (iii) Performance Reporting: to start reporting performance in the next quarter following approval;

- (iv) Incident Notification / Reporting: to start notifying and reporting incidents immediately following nomination/registration; and
- (v) Annual 3rd Party audit: to be undertaken within one year of approval of the OSHMS.
- (d) Entities classified as medium risk and informed to comply with the requirements of *ADOSH-SF - Mechanism 5.0 - OSH Requirements for Medium Risk Entities* shall be given a maximum of 6 months from official notification to comply with the requirements.

2.9 Monitoring Progress

- (a) The SRA shall ensure that it monitors the progress of all entities nominated and notified to comply with the requirements of the *ADOSH-SF*.
- (b) Where an entity fails to meet the timescales set for submission of their OSH MS, the SRA shall seek official clarification from the entity on the causes behind late submission and request an action plan from the entity that shall include timescales for submission. The timescales shall be no longer than one calendar month of the original submission date.
- (c) The SRA shall monitor the progress of entities that have failed to meet the original submission date.
- (d) Where entities fail to meet updated timescales for submission, the SRA shall officially invite the entity for a meeting to review status and agree timescales with the entity for submitting their OSH MS. The meeting shall be attended by a member of the entity's top management. The review meeting shall be officially recorded.

2.10 Providing Information on Entities with Approved OSHMS

- (a) ADPHC will publish the names of all entities with an approved OSH MS.

2.11 Entities Required to Develop a Safety Case

- (a) The SRA can request, based on risk assessment, an entity to perform a more detailed, specialized risk management technique, commonly called a Safety Case. This is an additional requirement above the entity OSH MS.
- (b) Reasons for this may include:
 - (i) if they consider that there are high risk activities, processes, substances or materials in use; and/or
 - (ii) if they consider that a building / facility is a major hazard facility.

Note: A Safety Case can be requested as part of the initial entity risk classification or at any time through Performance Monitoring outcomes.

- (c) Major hazard facilities (MHF's) are facilities that produce, store, handle or process large quantities of hazardous material (e.g. chemicals) and dangerous goods, including, but not limited to:
- (i) petroleum products;
 - (ii) petrochemical / chemical / gas refineries;
 - (iii) chemical manufacturing sites;
 - (iv) gas-processing plants;
 - (v) liquefied petroleum gas (LPG) facilities;
 - (vi) specific warehouses and transport depots; and
 - (vii) facilities of a similar kind to those listed.
- (d) Major hazard facilities have to demonstrate their operational safety through a Safety Case developed specifically for their unique operations and situation.

2.11.1 Process for Notifying Entities to Develop a Safety Case

- (a) The concerned SRA shall officially submit proposed entities identified to develop a Safety case to ADPHC for assessment and approval.
- (b) The submission shall be accompanied by an assessment showing scope and risks posed by the entity and objectives of the Safety Case.
- (c) The SRA shall officially inform the entity that they have been requested to develop a Safety Case, including:
 - (i) The scope, contents and requirements (in line with *ADOSH-SF - Element 2 - Risk Management*);
 - (ii) Timescales set by the SRA for submission;
 - (iii) Review and approval process; and
 - (iv) Inspection requirements.
- (d) The relevant emergency services shall be consulted on emergency plan preparation, and other relevant authorities shall be consulted on actions required for the safety of local community members in the event of a major incident.

2.11.2 Review and Approval of a Safety Case

- (a) The SRA shall review the Safety case for adequacy and provide official feedback to the entity.
- (b) Where required, the SRA shall liaise with other stakeholders who have an interest in the Safety Case, such as emergency services etc.
- (c) On approval of the safety case, the SRA shall officially inform the entity along with details of any additional requirements set by the SRA.

2.11.3 Monitoring of the Safety Case

- (a) The SRA shall develop a detailed monitoring plan for each individual safety case approved within their sector.
- (b) The monitoring of the Safety case shall include:
 - (i) Detailed Inspections, directly related to the Safety Case;
 - (ii) Testing of control measures implemented for specific scenario's; and
 - (iii) Detailed Audits, directly related to the Safety Case.
- (c) The SRA shall ensure that any non-compliance with the conditions of the Safety Case is communicated to the entity and corrective action agreed.
- (d) The SRA shall monitor the implementation of any corrective action.

3. ADOSH-SF - Standard Forms

Form A - Registration for Development of an OSHMS

This form is sent to the nominated entities by the SRA to inform them of the requirement to develop and implement an OSHMS. It is to be returned to the SRA acknowledging these requirements and providing entity information including contact details.

Form A1 - Identification of Entity Main Operation Activity

This form is to be used when the main undertaking of an entity is unclear or the entity works across a number of Sectors under ADOSH-SF.

Form B - Amendment of Registered Information

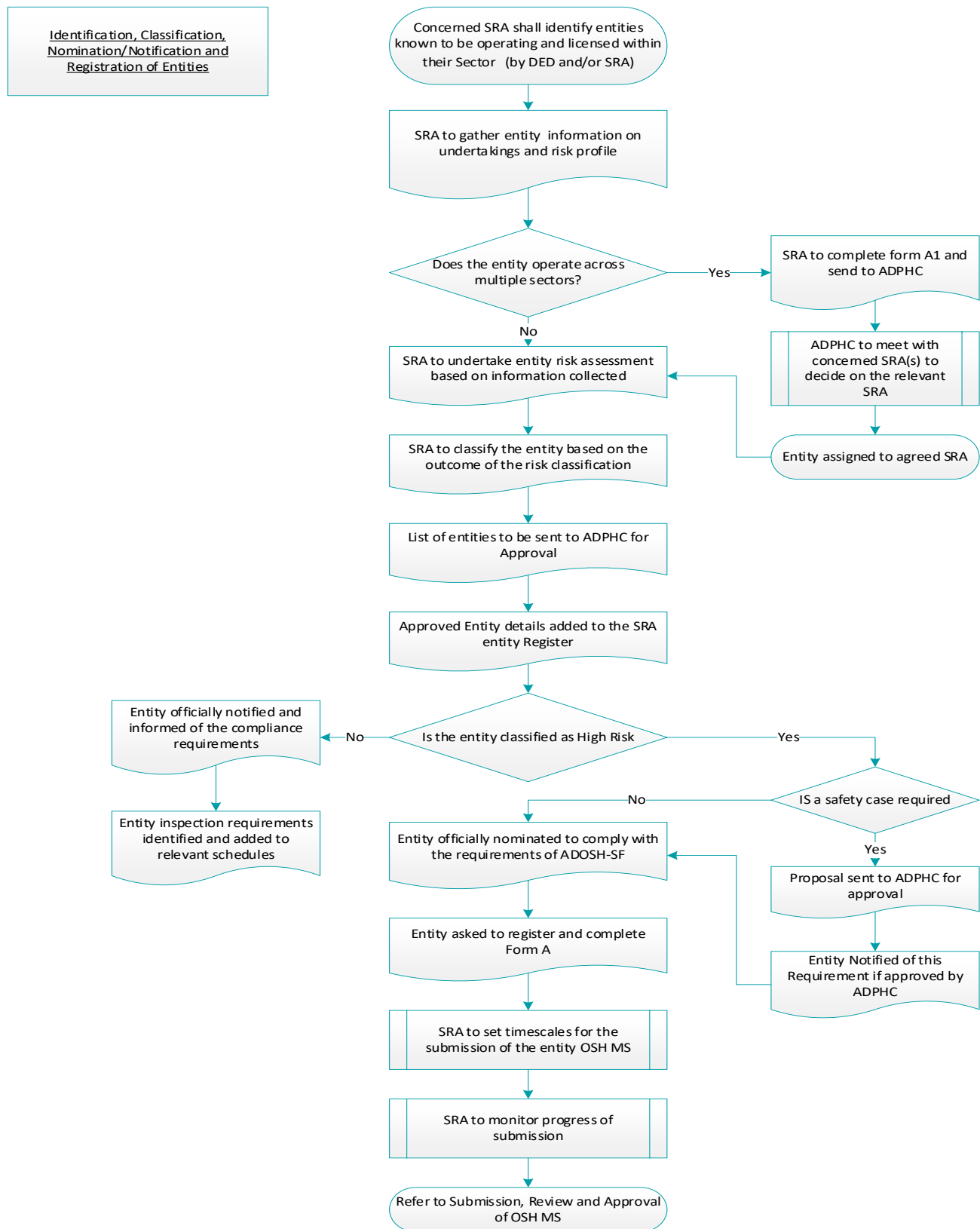
This form is to be used to inform of any changes to entity or contact details. This form is also to be used if an extension to the OSHMS development or implementation timelines is required.

ADOSH-SF Standard Forms are available at www.ADPHC.gov.ae

4. Document Amendment Record

<i>Version</i>	<i>Revision Date</i>	<i>Description of Amendment</i>	<i>Page/s Affected</i>
4.0	15 th July 2024	<i>System acronym updated from OSHAD-SF to ADOSH-SF to accurately reflect document title</i>	Throughout
		<i>Change from OSHAD to ADPHC</i>	
		<i>Change of Logo</i>	
		<i>Clause 2.4 updated to reflect manpower requirements for OSH.</i>	
		<i>Appendix 2 (ADOSH-SF Classification Codes) deleted together with deletion of reference to this Appendix in Clause 2.6(c)(vi).</i>	
		<i>Minor editorial changes throughout the document without changing requirements.</i>	

Appendix 1: Entity Identification, Assessment and Nomination/Notification Flowchart





امسح رمز الاستجابة السريعة لزيارة
منصات التواصل الاجتماعي الخاصة بنا
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media platforms