

	<b>EHS GUIDELINE</b>	<b>603</b>
	<b>Hazardous Activities</b> <b>OCCUPATIONAL TRAVEL</b>	<b>Issue date:</b> <b>July 2003</b>

## INTRODUCTION

Guideline This EHS Guideline contains advice on how to comply with Global EHS Standard 603 (Occupational Travel). While the Guideline sets out an approach that will normally be sufficient to ensure compliance with the Standard, it is not mandatory: compliance may be achieved through alternative approaches if these provide equivalent levels of protection. The text in shaded areas is reproduced from the Standard while the text in unshaded areas provides guidance on the preceding requirement.

## RATIONALE

Standard Travel, and in particular driving, is a major cause of work-related death, injury and illness. In addition, there are security aspects of travel that can affect the health and safety of GSK employees travelling on business. Employees travelling to certain locations may need specialist advice on security and medical services. Assessing and managing the environmental impacts of vehicle use will help to minimise their adverse effects.

## PURPOSE

Standard To minimise EHS risks arising from business travel.

## SCOPE

Standard This Standard applies across GSK wherever and whenever employees travel for business purposes, including driving their own, company or hired vehicles. It does not apply to personal travel or to employees commuting to and from their normal places of work.

## REQUIREMENTS

GSK operations shall implement a programme to:

**Guideline** GSK operations should manage occupational travel in a systematic manner that ensures ongoing compliance with both corporate requirements and any relevant local regulatory requirements. To this end, the following requirements should be implemented with reference to the requirements of Global EHS Standard 102 (Management System Elements) as part of an integrated EHS management system.

### 1. Identify and assess EHS and security risks associated with business travel;

Identify & Assess

GSK operations should establish a source of EHS and security risk information for common modes of travel and destinations for their business. Non-GSK sources, such as professional organisations, airlines and government agencies, are available. In addition, the Corporate Security, Global Travel Services, myEHS and Employee Health Management (EHM) web-sites offer information. These web-sites can be accessed through myGSK. If employees carry products, specimens or research material when travelling on business, information on airline requirements and material hazards should be available. Airline requirements can be obtained from local aviation authorities (eg the United States Federal Aviation Administration (FAA) at <http://cas.faa.gov/qa.html>). Information on the hazards of GSK materials is provided in Safety Data Sheets (SDSs), available through [MSDS@gsk](mailto:MSDS@gsk)<sup>TM</sup>.

GSK operations should identify:

- those employees who are exposed to occupational travel risks, ie who:
  - drive company-owned or leased vehicles;
  - routinely travel;
- modes of travel and destinations.

Since local procedures should require GSK employees to book travel only through GSK-approved travel agencies (see Requirement 2 below), travel agency records may be useful in identifying business travellers. Expense reports and company-issued credit card information may also be of use.

Assessments of both security and EHS risks should be conducted for the most common destinations and modes of travel (including shuttle buses, bicycles, motorcycles, pool vehicles, fleet vehicles, leased vehicles and aircraft). Further information can be found in EHS Guideline 202 (EHS Risk Assessment and Management).

When completing the *risk assessments*, GSK operations should review past reports on travel-related injuries and illnesses available on myEHS, as well as travel-related security incidents available from the ENTEGRA system, maintained by Corporate Security and Investigations (CSI).

### 2. Integrate EHS and security considerations into arrangements for travelling on business;

Control

GSK operations should ensure that EHS and security considerations are integrated into business travel arrangements, typically by using a *GSK-approved travel agency*. However, prior to adopting this approach, operations should confirm with the local GSK-approved travel agency that a system is in place whereby the agency, CSI and Employee Health Management (EHM) exchange information on areas of risk and employees planning to travel to those areas.

Travel procedures, employee responsibilities and information sources should be included in induction training for new employees likely to travel on business.

**3. Introduce ways of working that avoid or reduce the need for travel, wherever feasible, and ensure that travel schedules take due account of the risks of fatigue;**

Control

GSK operations should make available and actively promote alternatives to travel. Employees should be encouraged to consider the use of video-conferencing, teleconferencing, webcasts and net meetings. In addition, to minimise fatigue, local travel policies and procedures should:

- include restrictions on the number of hours that employees can drive without rest;
- require business travelling only during normal business hours, whenever *feasible*.

**4. Encourage the use of public transport, wherever feasible, taking into account personal safety and security considerations;**

Control

GSK operations (and travel policies and procedures) should encourage the use of public transportation for business travel whenever it is safe to do so. This should be broadly communicated and details of public transport services should be made available to all business travellers, eg by notices on travel itineraries and web-site notices.

**5. Where the use of motorcycles or bicycles for business travel is unavoidable, ensure that personal protective equipment, including helmets, is provided to employees, maintained and used, as per Global EHS Standard 605 (Use of Personal Protective Equipment);**

Control

Alternatives to motorcycles and bicycles should be used wherever feasible. As an alternative, GSK operations should consider appropriately selected cars for sales representatives and shuttle buses or pool cars for on-site and local travel.

Where the use of motorcycles and bicycles cannot be avoided, it is imperative that the GSK operation provide, maintain and require the use of appropriate Personal Protective Equipment (PPE). PPE should include helmets and reflective and protective clothing. Consideration should also be given to the use of both positive reinforcement (incentives) and disciplinary action for PPE use. Further information on the selection, issue, use and maintenance of PPE is provided in EHS Guideline 605 (Use of Personal Protective Equipment).

**6. Ensure that information and advice on health, safety, travel and security is available before, during and after travel;**

Control

As discussed under Requirement 1, GSK operations should establish a source of EHS and security information for travel destinations and modes of travel common for their business. They should consider the use of advisory reports from government agencies and travel offices, the CSI web-site, the Global Travel Services web-site and, for employees who carry products, specimens or research material, the Dangerous Goods web-site.

GSK operations should also adopt travel policies or procedures that specify that each employee is responsible for checking for EHS and security information and advice on their destinations prior to travel. This information should be kept up to date and made available to travellers before, during and after travel, eg through the intranet, e-mail travel alerts and telephone contact lists for CSI, EHM and GSK's official travel service provider (Business Travel International). Local policies and procedures should also require travellers carrying products, specimens or research material to seek guidance from local management on packaging, regulatory and airline requirements.

Because arranging for immunisations can take up to 6 weeks, and CSI needs a 2-week period to investigate travel to sensitive areas, employees should be instructed to review travel information at least 6 weeks prior to travel.

**7. Ensure the provision of immunisations, medications, information and advice appropriate to the risks involved and the health of the individuals concerned;**

Control

Prior to leaving on a business trip GSK employees should be encouraged to secure, as necessary, an adequate stock of personal medications, a spare pair of glasses, and any personal medical devices. Furthermore, GSK operations should ensure that any destination-specific immunisations, medications, and information required for the business trip are provided to employees well before they depart. Adequate time should be allowed for immunisations and medications required prior to departure; it often takes between 10 and 14 days before an individual can develop adequate protection from a vaccine or medication. These services should be:

- based on the most up-to-date, destination-specific health information that is available (ie from the sources described under Requirement 6);
- provided at low or no cost to the employee through arrangements with the benefits plan, accounts payable, or GSK providers;
- provided by a GSK employee healthcare provider or, if one is not available, by a contracted external employee health clinic.

A core set of the following immunisations should be offered to all business travellers:

- polio;
- diphtheria;
- tetanus;
- hepatitis A;
- hepatitis B.

Medications and additional vaccines should be offered, based on an assessment of the health risks associated with the particular destinations and modes of travel involved. The assessment should take account of up-to-date health information and any past EHS adverse events. From GSK's past experience, the most common indications for over-the-counter and prescription medications are for the:

- prevention and treatment of jet lag;
- prevention and treatment of traveller's diarrhoea;
- prevention of malaria.

Travel health consultations with the business traveller should be conducted, and should include:

- EHS and security risks associated with the destination and mode of travel;
- details of how and when to get medical assistance while travelling abroad;
- requirements for reporting illness and injury that occur during business travel.

Initial and periodic fitness-to-travel assessments should also be considered for those employees whose work requires regular business travel. In addition, sources of information for a specific GSK operation or country should be published and identified at employee orientation sessions.

**8. Ensure that emergency medical assistance is available when travelling on business;**

Control

GSK operations can meet this requirement by participating in GSK's global *FirstAssist* scheme. In such cases, any employee requiring medical assistance while travelling should telephone FirstAssist (+44 208 763 3278) for support and assistance. Operations not participating in FirstAssist should ensure that an alternative method of providing emergency medical assistance is available to all employees when they are travelling on business. The scope of that assistance should be based on the risk assessments carried out as described under Requirement 1, but should typically include the following services:

- emergency medical assistance, 24 hours a day, 365 days a year;
- an emergency card with telephone numbers, policy number and e-mail address;
- guarantee of payment (inpatient and outpatient);
- medical and dental referrals;
- dispatch of medication and medical supplies;
- case management;
- medical evacuation;
- repatriation;
- repatriation of mortal remains;
- interpretation and translation;
- interfaces with EHM to capture travel-related injury and illness data.

Regardless of whether FirstAssist or an alternative is used, GSK operations should ensure that business travellers are aware of and know how to use the system, eg by using notices on travel itineraries, web-site notices, employee induction and training sessions.

**9. Ensure that, where feasible, vehicles are purchased, hired and used only if they have been assessed as safe, energy-efficient and environmentally suitable;**

Control

GSK operations should integrate EHS considerations into vehicle procurement processes (ie purchase, lease and hire), take EHS factors into account when making procurement decisions and give preference to qualified suppliers that can provide vehicles with higher EHS and security standards. Potential vehicles should be evaluated against current good practice.

EHS considerations should include:

- crash test performance;
- safety equipment (eg seat belts, air bags, anti-lock braking);
- fuel efficiency;
- emission levels.

Security considerations should include:

- how difficult the vehicle is to break into (eg door locks);
- security alarms and immobilisers;
- internal central locking;
- special security provisions for high-risk situations (eg bullet-proof glass).

**10. Equip, or retrofit, all company cars and trucks with front and rear seat belts and ensure that they are used;**

Control

GSK operations should survey purchased and leased vehicles and contract hire-car providers to ensure that all vehicles are fitted with both front and rear seat belts. A plan should be developed providing specific timeframes for retrofitting or replacing any vehicles that do not comply. Travel policies and procedures should require all GSK employees to use front and rear seat belts while travelling on company business. This requirement should be communicated to all business travellers, eg using notices on travel itineraries, web-site notices, employee induction and training sessions. Consideration should also be given to the use of positive reinforcement (incentives) and disciplinary action for seat belt use.

**11. Maintain all vehicles to ensure that they are in a safe condition and that emissions to atmosphere are minimised;**

Control

Operations should ensure that a preventive maintenance *programme* covers all purchased and leased vehicles. The programme should be sufficiently rigorous to ensure that each vehicle is in such a condition that it is safe to operate, is fuel-efficient and has an appropriate level of emissions. Consideration should be given to keeping maintenance logs and safety checklists with each vehicle to document this programme. The contractual agreements with rental car companies should require this type of maintenance programme for rented vehicles.

**12. Prohibit employees from using mobile telephones, or engaging in any other activities that may distract them, while driving vehicles;**

Control

The use of hand-held mobile phones while driving on company business is not permitted within GSK. All drivers with mobile phones should be advised to switch to voicemail before driving and then check for messages and make calls when safely parked. Furthermore, all employees should be advised that if they call someone and discover that they are driving, then they should end the call as soon as possible and arrange to call back at a convenient time.

Research shows that drivers are four times more likely to have a vehicle accident when using a mobile phone. The use of hands-free kits does not eliminate the distracting nature of making a telephone call and still increases the risk of having an accident. For this reason, the use of such kits should not be encouraged. Individual GSK operations are at also liberty to go further and prohibit the use of all mobile telephones (both hand-held and hands-free) whilst driving.

In those parts of GSK where hands-free car kits are installed by or on behalf of the company, they should be voice-activated and therefore not require any manual intervention by the driver. In addition, they should be used only:

- for receiving essential telephone calls;
- for as short a time as possible;
- if the drivers can do so without endangering their own or anyone's else safety.

Local travel policies and procedures should reflect the above guidance and should prohibit drivers from engaging in any activity that distracts them while driving. In addition to the use of mobile telephones, other specific prohibitions should be included against such activities as eating, drinking, changing tapes or CDs, personal grooming, smoking, reading, writing and laptop use.

The policies and procedures should provide for progressive disciplinary action against employees engaging in these activities while driving. These requirements should be communicated to all employees. GSK operations should consider using notices on travel itineraries, web-site notices and employee orientation sessions. Operations should ensure that investigations of vehicle-related adverse events highlight any distracting behaviour that may have contributed to the event.

**13. Prohibit employees from driving vehicles while impaired through alcohol, drugs or lack of sleep or from knowingly travelling in vehicles whose drivers are so impaired;**

Control

Travel policies and procedures should prohibit drivers from driving while impaired and from travelling in vehicles operated by impaired drivers. In addition to prohibiting drivers from driving while intoxicated, operations should consider specific prohibitions against driving after taking medicines that cause drowsiness, after social drinking and before getting the hours of rest specified in the GSK operation's procedures (see under Requirement 3). The policies and procedures should include progressive discipline for employees driving while impaired. These requirements should be communicated to all employees. GSK operations should consider using notices on travel itineraries, web-site notices, and employee orientation sessions. Operations should ensure that investigations of vehicle-related adverse events highlight any impairments that may have contributed to the event.

**14. Ensure that employees driving on business have valid driving licences, acceptable driving records and suitable levels of driving experience and fitness;**

Control

GSK operations should assess employees' driving licences, driving records, driving experience and fitness to drive before allowing them to drive a company vehicle, and periodically thereafter. The assessment should seek to verify that the type of licence and level of experience are sufficient for the type of vehicle that will be driven. If an employee's driving record or experience is unsatisfactory, the employee should complete driver training (eg defensive driving, remedial driver training) before being allowed to begin or continue to drive company vehicles.

**15. Provide employees with equipment, information and training appropriate to the types of vehicles driven, their driving records and vehicle usage, and the driving conditions;**

Control

Employees who routinely drive company-owned or leased vehicles should be provided with driving training appropriate to the type of vehicle operated and to the driving conditions. This training should be provided:

- when employees are initially assigned to such duties;
- periodically thereafter according to the assessed need (typically every three years).

**16. Ensure that insurance cover appropriate to the assessed risks is in place for all GSK vehicles and for all employees driving or being driven on business;**

Control

GSK insurance and loss-prevention procedures require GSK companies throughout the world to insure their own risks adequately. The appropriate risk assessments (as described under Requirement 1) should be shared with the person responsible for insurance in the GSK operation so that they can confirm that adequate coverage is in place.

**17. Investigate and report, as per Global EHS Standard 208 (Investigation and Reporting of EHS Adverse Events), all cases where employees suffer injury or ill health, or are involved in any other adverse events, while travelling on company business.**

Review

GSK operations should ensure that all travel-related EHS adverse events (including security incidents) are reported via the Travel Incident Report Form on the Global Travel Services web-site. The reporting of travel-related illnesses can be encouraged through a combination of the following:

- ensuring that local employee health and EHS professionals clearly understand reporting requirements;
- educating travellers to use the Travel Incident Report Form;

- reminding employees, in the course of presentations and travel consultations, of the importance of reporting;
- sending reminder e-mails from the travel reservation system or clinic to travellers upon their return;
- contacting employees who have used FirstAssist and asking them whether their illnesses or injuries could have been work-related (FirstAssist inform GSK operations every quarter as to which employees have used their services).

Travel-related injuries and illnesses should normally be investigated using the local process for investigating other EHS adverse events. Occupational travel-related should be investigated with special care because they may not appear until a long time after exposure to the causal agent and often resemble non-occupational illness. Employee health professionals should always be involved in the evaluation process for suspected occupational illnesses.

Adverse event investigations should include root-cause analysis and GSK operations should monitor the results of investigations in order to identify any significant patterns or trends. Security incidents should be reported to, and investigated in conjunction with, CSI. Further information is provided in EHS Guideline 208 (Investigation and Reporting of EHS Adverse Events).

## APPENDIX 1 DOCUMENTATION REQUIREMENTS

<b>Primary Record</b>	<b>Retention Period</b> (Global Records Retention Ref.)
<b>Identify &amp; Assess</b>	
Regulatory and other requirements for occupational travel	review annually and destroy outdated material (GRS011)
Assessments of travel-related EHS and security risks	10 years after superseded (GRS058)
<b>Control</b>	
Policies, procedures and work instructions outlining responsibilities and the approach to be adopted for occupational travel, including emergency medical assistance	5 years after superseded by new version (GRS071)
Vehicle assessments and specifications; driver assessments	10 years after superseded (GRS058)
Insurance policies for occupational driving	6 years after completed or expired (GRS067)
Records of preventive maintenance carried out on vehicles (with results)	no longer than 1 year after life of equipment (GRS003)
Information and training records	review annually and destroy outdated material (GRS012)*
Medical records, including records of immunisations, medications, information and advice provided	40 years after employment ends (GRS054)
<b>Review</b>	
Records of investigations of occupational travel-related EHS adverse events	10 years (GRS058)
Self-audits and corporate audits of occupational travel programmes	3 years after audit is closed (GRS043)
Reviews of occupational travel programmes	10 years (GRS058)
Action plans and documentation of progress in delivering continuous improvement in relation to occupational travel	10 years (GRS058)

\* Refer to EHS Guideline 205 (Employee Information and Training) for further details on the retention of information and training records

## APPENDIX 2 KEY TERMS

<b>GSK-approved travel agency</b>	A travel agency approved for use at an employee's location by GSK Procurement.
<b>feasible</b>	Technically possible without endangering product quality or any other key business needs. Achievable without an expenditure of resources so large as to be disproportionate to the anticipated reduction in EHS risks or adverse EHS impacts.
<b>FirstAssist</b>	A GSK-approved scheme for providing emergency medical assistance to GSK employees when they are travelling on business.
<b>GSK operation</b>	Any GSK business unit, site or subdivision of a site that is concerned with a definable aspect of GSK's business, together with the employees who manage that aspect of the business.
<b>programme</b>	One or more procedures that together form the basis on which an issue or topic is managed. Further details on what constitutes a programme are given in Global EHS Standard 102 (Management System Elements).
<b>risk assessment</b>	A systematic examination of activities or processes to identify the probability of EHS adverse events, such as injuries, illnesses and harm to the environment or the business, together with an evaluation of their potential consequences.