NATIONAL SELF-INSURER OHS MANAGEMENT SYSTEM AUDIT TOOL

VERSION 3

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Contents

Introduction and history

In 2005, a multi-jurisdictional working party of regulatory bodies under the Heads of Workers Compensation Authorities was formed to develop a health and safety audit program and a set of audit guidelines that were agreed at a national level. The *National Self-Insurer OHS Management System Audit Tool*, User Guide and Workbook (NAT) was an outcome of that process. The content of this tool was based on Australian Standards, AS/NZS 4801: *Occupational health and safety management system – Specification with guidance for use* and AS/NZS 4804: *Occupational health and safety management system – General guidelines on principles, systems and supporting techniques*. Other industry-accepted audit tools including SafetyMAP, the New South Wales Self-insurer Audit Tool and the South Australian Performance Standards for Self-insurers, were considered during the development of NAT, version 1. The views of self-insured employers and other stakeholders were also sought and considered.

In March 2009, a review of the NAT was undertaken by the members of the NAT Review Working Party (NRWP) taking into consideration the comments and feedback received from self-insured employers and other stakeholders. The outcome of the review was the *National Self-Insurer OHS Audit Tool, User Guide and Workbook (NAT), version 2*.

A second review of the NAT was undertaken during 2012/13 by the members of NRWP. Consideration was given to the comments and feedback received from self-insured organisations and other stakeholders. The outcome of the second review is the *National self-insurer OHS management system audit tool (NAT), version 3*.

OHS management system

An organisation establishing and maintaining an occupational health and safety management system (OHSMS) shall include organisational structure, planning activities, responsibilities, authorities and accountabilities, communications, practices, procedures, processes, and tools and resources for developing, implementing, achieving, reviewing and maintaining the health and safety policy to safely manage the risks associated with the business practices of the organisation.

Auditing of an OHS management system by regulators

By definition, an OHSMS audit is a systematic examination against defined criteria to determine whether activities and related results comply with planned arrangements, and whether these arrangements are implemented effectively and are suitable to achieve the organisation's policy and objectives.

The NAT defines the criteria that relevant regulators will use within their jurisdictions to assess a self-insurers OHSMS.

The scope of the audit may vary according to the needs of the regulator. They may choose to focus their audits on critical components of the system, particular sites or business units, or they may find it necessary to audit the entire management system across the whole organisation.

Regulators acknowledge that self-insurers have the option and flexibility to use a variety of proprietary or in-house products to help them develop and measure the performance of their own OHSMS.

The outcome of an audit is not to provide detailed recommendations for solutions to any identified problems, the purpose is to gather objective evidence during an audit to enable the auditor to evaluate conformance or nonconformance (or other ratings as appropriate) against the audit criteria. This provides the organisation's management with evidence-based information that can be used to review the effectiveness of OHSMS and plan change that is designed to deliver continual improvement in managing health and safety in the workplace.

In addition, these audits are designed to assist regulators to make decisions regarding self-insurance requirements.

Audits, inspections and legislative compliance

An OHSMS audit is separate from a workplace inspection program. Inspections are conducted to detect hazards in the workplace and to check how well risk controls are working for particular activities, processes or areas. Audits look at the procedures and processes that are intended to manage the entire health and safety program, rather than the individual deficiencies and failures identified during inspections. These two activities (audit and inspection) are complementary to each other and are not mutually exclusive.

Some of the audit criteria in the NAT refers to the requirements of the relevant health and safety legislation, and conformance to these criteria should indicate that the organisation has adopted the management practices needed to fulfil its legal responsibilities. However, conformance to the audit criteria alone does not assure compliance with all statutory obligations, nor does it preclude any action by a regulatory body.

Audits are not designed to assess the performance of individuals

Audits of an OHSMS should assess how effectively the system, including its structure, policies, planning activities, resourcing, operating procedures, and work practices combine together to manage the risks associated with the organisation's business. Audits are not designed to measure the performance of individuals working within the system.

Auditors and audit methodology

OHSMS audits undertaken for the purpose of assisting regulators to make decisions regarding self-insurance are conducted by auditors who are appropriately qualified and experienced in system auditing. Various audit training and certification programs are available to ensure that they have the required competency and experience for this work.

The audit approach underpinning the NAT is consistent with the comprehensive auditing methodology provided in AS/NZS ISO 19011: *Guidelines for quality and/or environmental management systems auditing*.

Self-audit program

A self-audit program is a requirement in some jurisdictions. When establishing a self-audit program, self-insurers should consider:

- establishing an appropriately qualified and experienced audit team in accordance with AS/NZS ISO 19011
- defining audit objectives
- defining auditor responsibility and tasks
- initiating audit by determining audit scope, frequency and review process
- preparing audits by formulating an audit plan, audit team assignment and working documents executing audits
- submitting audit results using audit guidelines and an agreed audit plan
- determining and taking any corrective action to address nonconformance.

In other words, an audit should go beyond the paper trail to establish the level of implementation within the workplace and whether the system contributes to improvement in health and safety performance. Evaluation of this evidence should enable the audit team to determine whether there is conformance or nonconformance with the audit criteria.

A self-audit report should contain information about the evidence that contributed to the auditor's judgement of conformance or nonconformance. The report may also include opportunities for improvement where identified. However, it is a management responsibility to decide what changes are required as a result of an audit and to initiate actions to improve performance.

Note: Self-insurers may elect to engage the services of an independent auditor as part of their self-audit program to obtain objective evidence of conformance to the NAT.

Summary

This audit tool has been designed to assist those regulators conducting audits using the NAT to understand and apply the audit criteria in a consistent manner.

The NAT may also be used by self-insurers when undertaking self-audits to help them prepare and monitor their performance against the same criteria used by the regulators.

The following pages define the audit criteria, provide further information about the criteria to assist with interpretation and understanding, and offer guidance to auditors and users to improve the efficiency and effectiveness of audit activities.

Audit criteria

Element 1: Health and safety policy

1.1 Policy

1.1.1
Senior management in consultation with all employees and/or their representatives shall define and document its policy for, and commitment to, health and safety. The policy shall be endorsed and supported by the most senior management within the organisation – eg the Chief Executive Officer or Managing Director. The health and safety policy shall be developed consistent with relevant legislative requirements and include a commitment to:

   a. the risk management process and ensure consistency with the nature of workplace activities and scale of health and safety risks

   b. comply with relevant health and safety legislation and other requirements placed upon the organisation or to which the organisation subscribes

   c. establish measurable objectives and targets for health and safety to ensure continuous improvement aimed at elimination of work-related illness and injury

   d. the provision of appropriate health and safety training to all employees

   e. the consultation process to ensure all employees are included in the decision making where there is an impact on workplace health and safety

   f. the dissemination of health and safety information to all employees, contractors, labour hire employees and visitors to the workplace

   g. effective implementation of the health and safety policy.

1.1.2
The health and safety policy is available to other interested parties, including regulatory authorities, suppliers, contractors, and those visiting the workplace.

1.1.3
The health and safety policy is maintained and reviewed periodically to ensure it remains relevant and appropriate to the organisation's health and safety risks.

Element 2: Planning

2.1 Legal requirements and practical guidance

2.1.1
The organisation identifies and monitors the content of all health and safety legislation, standards, codes of practice, agreements and guidelines relevant to its operation.

2.1.2
The organisation's procedures, work instructions and work practices reflect the requirements of current health and safety legislation, standards, codes of practice, agreements and guidelines.

2.1.3
Relevant personnel in the organisation are advised of, and have ready access to, current relevant health and safety legislation, standards, codes of practice, agreements and guidelines.

2.1.4
The organisation and/or individual satisfies legal requirements to undertake specific activities, perform work or operate equipment including any:

   a.   licence

   b.   certificate of competency

   c.   notification

   d.   registration

   e.   approval or exemption

   f.   other relevant requirements.

2.1.5
Changes to health and safety legislation, standards, codes of practice, agreements and guidelines generate a review of existing procedures.

2.2   Objectives and targets

2.2.1
Health and safety objectives, and targets consistent with the organisation's health and safety policy are documented, are appropriate to the organisation's activities and consider:

   a.   legal requirements

   b.   standards, codes and guidelines

   c.   health and safety hazards, and risks

   d.   past health and safety performance (as defined by the organisation's system requirements)

   e.   technological developments

   f.   leadership and worker participation.

2.2.2
Specific health and safety objectives and measurable targets have been assigned to all relevant functions and levels within the organisation.

2.2.3
The organisation sets health and safety performance indicators that are consistent with its objectives and targets.

2.3   Health and safety management plans

2.3.1
In addition to defining the means by which the organisation will achieve its objectives and targets, the health and safety management plan(s):

   a.   responds to legal requirements

   b.   is based on an analysis of information relevant to the nature of the organisation's activities, processes, products or services

   c.   takes account of identified hazards and health and safety management system failures

   d.   aims to eliminate or reduce workplace illness and injury

   e.   defines the organisation's priorities

   f.   sets timeframes

   g.   allocates responsibility for achieving objectives and targets to relevant functional levels

   h.   states how the plan will be monitored.

2.3.2

The organisation monitors its progress towards meeting the objectives and targets set in the health and safety management plan and takes corrective actions to ensure progress is maintained.

2.3.3

The organisation shall ensure health and safety management plans are kept up-to-date by reviewing the plan(s):

   a.   on a regular basis

   b.   when there are changes to the organisation's activities, processes, products or services.

Element 3: Implementation

3.1   Structure and responsibility – Resources

3.1.1

Financial and physical resources have been identified, allocated and are periodically reviewed, to enable the effective implementation and improvement of the organisation's health and safety management system.

3.1.2

There are sufficient qualified and competent persons to implement the organisation's health and safety management system as identified through a documented review.

3.2   Structure and responsibility – Responsibility and accountability

3.2.1

Senior management understand the organisation's legal obligations for health and safety and can demonstrate how they fulfil them.

3.2.2

A member(s) of senior management or the board of directors has been allocated overall responsibility for the health and safety management system and reports to that group on its performance.

3.2.3

The specific health and safety responsibilities (including legislative obligations), authority to act and reporting relationships in the organisation have been defined, documented and communicated.

3.2.4

Where contractors are utilised in the organisation, the health and safety responsibilities and accountabilities of the organisation and the contractor(s) have been clearly defined, allocated and communicated within the organisation and to the contractor(s) and their workers.

3.2.5

Workers are held accountable for health and safety performance in accordance with their defined responsibilities.

3.3   Structure and responsibility – Training and competency

3.3.1

The organisation has a procedure for identifying and defining the health and safety training needs of employees, contractors, labour hire employees or visitors, where relevant.

3.3.2

The organisation consults with employees to identify their training needs in relation to performing their work activities safely.

3.3.3

A documented training plan(s) based on training needs shall be developed and implemented.

3.3.4
The organisation trains workers (as appropriate) to perform their work safely, and verifies their understanding of that training.

3.3.5
The organisation has an induction program for all workers including management, which is based on their likely risk exposure, and provides relevant instruction in the organisation's health and safety policy and procedures.

3.3.6
Training and assessment is delivered by competent persons with appropriate knowledge, skills and experience.

3.3.7
The health and safety requirements of tasks are identified, applied to the recruitment and placement of workers, and tasks are allocated according to their capability and level of training.

3.3.8
Management has received training in health and safety management principles and practices appropriate to their role and responsibilities within the organisation, and the relevant health and safety legislation.

3.3.9
Those representing the employer and the workers on health and safety matters, including representatives on consultative committee(s), receive appropriate training to enable them to undertake their representative roles effectively.

3.3.10
Refresher training (as identified by the training needs) is provided to all workers to enable them to perform their tasks safely.

3.3.11
The training program is reviewed on a regular basis, and when there are changes in the workplace that impact on the health and safety of workers, to ensure that the skills and competencies of workers remain relevant.

3.4   Consultation, communication and reporting – Consultation

3.4.1
There are procedures agreed to by workers outlining their involvement and consultation in:

  a.   health and safety matters

  b.   health and safety issues

  c.   any proposed changes to the work environment, processes, practices or purchasing decisions that impact on their health and safety.

3.4.2
The organisation has:

  a.   in consultation with workers, determined the number of worker representatives required to effectively represent all work groups

  b.   made arrangements to allow the workers to select those who will represent them on health and safety matters consistent with legislative requirements

  c.   communicated the consultative arrangements to workers, including names of their worker and employer representatives for health and safety matters.

3.4.3

Those who represent workers on health and safety matters:

    a.   are provided time and resources to effectively undertake this role

    b.   meet regularly with management about health and safety issues and the minutes of their meetings are available to all workers.

3.4.4

Workers or their representatives are involved in the development, implementation and review of procedures for the identification of hazards and the assessment and control of risks.

3.5   Consultation, communication and reporting – Communication

3.5.1

The organisation's health and safety policy and other relevant information on health and safety are communicated to all workers, and consider language and standards of literacy.

3.5.2

The organisation regularly communicates to workers about the progress towards the resolution of health and safety disputes.

3.5.3

There are procedures for exchange of relevant health and safety information with external parties, including customers, suppliers, contractors and relevant public authorities.

3.5.4

There is a procedure that encompasses health and safety issues for dealing with formal and informal complaints received from external parties.

3.6   Consultation, communication and reporting – Reporting

3.6.1

Workplace injuries and illnesses, incidents and health and safety hazards, dangerous occurrences and systems failures, are reported and recorded in accordance with relevant procedures.

3.6.2

Where there is a legislative requirement, injuries, illnesses, incidents and dangerous occurrences are notified to the appropriate authorities within the stipulated timeframes.

3.6.3

Reports on health and safety inspections, testing and monitoring, including recommendations for corrective action, are produced and forwarded to senior management and worker representative(s) as appropriate.

3.6.4

Regular, timely reports on health and safety performance, including reports against health and safety objectives, targets and management plans are produced and distributed within the organisation.

3.6.5

Reports of audits and reviews of the health and safety management system are produced and distributed within the organisation.

3.6.6

The organisation's annual report or an equivalent document includes information about health and safety performance.

3.7 Documentation

3.7.1
The organisation's health and safety policy, plans and procedures are documented in a planned and organised manner.

3.7.2
Specific instructions and safe work procedures associated with particular products, processes, projects or sites have been developed where appropriate.

3.8 Document and data control

3.8.1
The organisation has a system for creating, modifying and approving health and safety documents and data, and notifying relevant persons of any changes. Obsolete documents and data are identified and retained (where required) for legal and/or knowledge preservation purposes and are removed from all points to prevent unintended use.

3.8.2
Documents and data critical to health and safety shall be clearly identifiable, duly authorised prior to issue, kept legible and include their issue status.

3.8.3
The organisation provides workers with ready access to relevant health and safety documents and data and advises them of its availability.

3.8.4
Documents and data are regularly reviewed by competent persons to ensure their effectiveness, suitability and the currency of the information.

3.9 Health and safety risk management program

3.9.1
The organisation documents its methodology to reduce health and safety risks through hazard identification, risk assessment and development of risk control measures in accordance with the hierarchy of controls and legal requirements.

3.9.2
The organisation has identified the hazards, including public safety hazards that are associated with its activities, processes, products or services, assessed the risks involved, and implemented suitable control measures in accordance with the organisation's methodology.

3.9.3
The hazard identification, risk assessment and risk control process is undertaken by persons competent in the use of the organisation's methodology.

3.9.4
The organisation documents all identified hazards, risk assessments and risk control plans.

3.9.5
Risks of identified hazards are assessed in consultation with workers having regard to the likelihood and consequence of injury, illness or incidents occurring, taking into consideration:

   a. legal requirements

   b. evaluation of available information

   c. records of incidents, illness and disease

   d. the potential for emergency situations.

3.9.6
The level of risk is assessed and used to prioritise the implementation of risk control measures.

3.9.7
Risk management methodology and its associated procedures shall be reviewed and revised where necessary to ensure relevance, adequacy and compliance with health and safety management system requirements.

3.9.8
The organisation has a program for identifying and managing change that may impact on health and safety.

3.10 Hazard identification, risk assessment and control of risks

3.10.1
The organisation determines those areas where access controls are required and ensures effective controls are implemented and maintained.

3.10.2
Health and safety requirements are identified, evaluated and incorporated into all purchasing specifications for services.

3.10.3
The ability to meet health and safety requirements is assessed in the selection of contractors and labour hire employees.

3.10.4
Contractor health and safety performance is monitored and reviewed to ensure continued adherence to the organisation's health and safety requirements or specifications.

3.10.5
The organisation determines its health and safety requirements prior to the purchase of goods, and communicates those specifications to the supplier.

3.10.6
Procedures shall be established and implemented for verifying that purchased goods meet health and safety requirements and any discrepancies identified are addressed before the goods are put into operational use.

3.10.7
Hazard identification, risk assessment and the development of control measures are undertaken during the design stage of plant, products, buildings or processes, or when the design is modified.

3.10.8
Competent persons verify that designs and modifications meet specified health and safety requirements.

3.10.9
There are procedures to ensure that materials and substances are disposed of in a manner that minimises risk of personal injury and illness.

3.10.10
Facilities and amenities in the workplace conform, as a minimum, to relevant legislation, standards and codes of practice.

3.10.11
The organisation has a program for the safe use, handling, transfer, inventory management and transport of hazardous chemicals.

3.10.12
Comprehensive health and safety information on all hazardous chemicals is readily accessible.

3.10.13
The organisation ensures that hazardous chemicals are stored safely and in accordance with legislative requirements.

3.10.14
The organisation has permit to work procedures for use when required.

3.10.15
Where personal protective equipment is required, it is appropriate for the task, its provision is accompanied by suitable training or instruction, and it is used correctly and maintained in a serviceable condition.

3.10.16
Plant and equipment is maintained to ensure safe operational use and a record is kept which includes (but is not limited to) relevant details of inspections, maintenance, repair and alteration of plant.

3.10.17
There is a procedure for unsafe plant and equipment to be identified and quarantined or withdrawn from service.

3.10.18
Controls are implemented to ensure the safety of persons (including members of the public) whilst plant and equipment is in the process of being cleaned, serviced, repaired or altered.

3.10.19
Competent persons verify that plant and equipment is safe before being returned to service after repair or alteration.

3.10.20
Safety signs, including regulatory, hazard, emergency information and fire signs, meet relevant standards and codes of practice, and are displayed in accordance with legal and organisational requirements.

3.10.21
There are procedures to ensure that materials are transported, handled and stored in a safe manner.

3.10.22
Workers are supervised according to their capabilities and the degree of risk of the task they are undertaking, to ensure that tasks are performed safely and work instructions and procedures are followed.

3.10.23
The organisation has a program to effectively manage the safety of its workers when working at workplaces not under the control of the organisation.

3.10.24
Customer-supplied goods and services used in the organisation's work processes are subject to hazard identification, risk assessment and control prior to use.

3.10.25
All substances in containers and transfer systems are identified and clearly labelled to avoid inadvertent or inappropriate use.

3.11 Emergency preparedness and response

3.11.1
Potential emergency situations have been identified and an emergency plan is:

a. developed for the organisation and its workplaces

b. in accordance with legislative requirements

c. regularly reviewed.

3.11.2
The organisation has allocated overall responsibility for control of emergency situations to specified individuals and communicated this information to all workers.

3.11.3
Workers receive training and practice in the emergency plan appropriate to their allocated emergency response responsibilities.

3.11.4
Competent persons have periodically assessed the suitability, location and accessibility of emergency equipment, including where changes to layout, equipment or process have occurred.

3.11.5
Emergency and fire protection equipment, exit signs and alarm systems are inspected, tested and maintained at regular intervals.

3.11.6
The organisation has a system in place to ensure emergency authorities are informed of relevant hazards on-site (including hazardous chemicals) when attending an emergency.

3.11.7
The organisation has assessed its first aid requirements and the first aid program is in place.

3.11.8
The organisation has a procedure(s) to assist workers who are exposed to critical incidents at work.

Element 4: Measurement and evaluation

4.1 Monitoring and measurement – General

4.1.1
There is a health and safety inspection, testing and monitoring program that incorporates a timely and effective corrective action processes.

4.1.2
Inspections seek input and involvement from the workers who are required to undertake the tasks being inspected.

4.1.3
Engineering controls, including safety devices, are regularly inspected and tested (where appropriate) to ensure their integrity.

4.1.4
Monitoring of the workplace environment (general and personal) is conducted where appropriate and records of the results are maintained.

4.1.5
Inspection, measuring and test equipment related to health and safety monitoring is appropriately identified, calibrated, maintained and stored.

4.2   Monitoring and measurement – Health surveillance

4.2.1
The organisation has identified those situations where workers' health surveillance should occur and has procedures to conduct this surveillance. The health of workers exposed to specific hazards is monitored, recorded, reported and action is taken to address any adverse effects.

4.3   Incident investigation and corrective action

4.3.1
There are procedures (incorporating appropriate methodologies) for investigating and implementing corrective action following injuries, illnesses, incidents and other system failures impacting on health and safety.

4.3.2
Investigations shall:

    a.   be undertaken by a competent person(s) in accordance with the organisation's procedure

    b.   identify the factor(s) that led to the injury, illness, incident or other system failure

    c.   review the identified hazards, assessed risks and effectiveness of the control measures

    d.   recommend appropriate control measures and corrective actions.

4.3.3
Corrective actions are:

    a.   determined in consultation with affected workers

    b.   implemented in a timely manner

    c.   assessed for their effectiveness by assigned personnel.

4.4   Records and records management

4.4.1
The organisation has a program for management of health and safety records including:

    a.   identification and traceability

    b.   collection, indexing and filing

    c.   access and confidentiality

    d.   retention and maintenance

    e.   protection against damage, deterioration or loss

    f.   retrieval

    g.   disposal.

4.5   Health and safety management system audits

4.5.1
There is a health and safety management system audit program to verify the effectiveness of the organisation's health and safety management system. The audit program takes into consideration health and safety risks and the results of previous audits.

4.5.2

The organisation ensures that scheduled audits are performed to verify that:

    a.   workplace activities comply with health and safety procedures

    b.   procedures are properly implemented and maintained

    c.   procedures are effectively implemented across the organisation.

4.5.3

Deficiencies highlighted by the audits are prioritised and progress monitored to ensure corrective action is implemented.

Element 5: Management review

5.1.1

The organisation has a health and safety management system review program to ensure the continuing suitability and effectiveness of the system. The review program is undertaken with senior management and officer involvement, and takes into account:

    a.   health and safety management system audit results

    b.   objectives, targets and performance indicators

    c.   changing circumstances

    d.   opportunities for continuous improvements.

5.1.2

Recommendations arising from health and safety management system reviews generate actions to improve performance and those actions are implemented.

How to use this audit tool

User guide

The guidance is set out as shown in the example below.

1.1.2

The health and safety policy is available to other interested parties, including regulatory authorities, suppliers, contractors, and those visiting the workplace.	Audit criterion	❶
ⓘ The company's health and safety policy communicates its commitment to health and safety and is freely available to all other interested parties with which it deals. This demonstrates to suppliers and contractors the level of support they can expect. The policy would normally be displayed in a prominent position in the organisation as a constant reminder of the company direction.	Explanation of criterion	❷
⚑ • Guidance to auditors and users.	Guidance to auditors and users	❸
📄 • An electronic copy of the policy on the organisation's webpage. • Policy contained in organisation's annual report. • Policy included in induction material. • Policy included in tender documentation.	Examples of documents/records	❹
❓ • How are contractors and their workers advised about the health and safety policy?	Discussions or questions that may assist	❺
↻ • Policy on display in reception/visitor areas.	Walk around observations at the workplace	❻

The audit criterion is the only auditable component (subject to the definition of terms used in this document). The other information and examples (at points 2, 3, 4 and 5) provide information and assistance in understanding the criterion.

The information section provides a further explanation of the criterion. This additional information may assist in interpretation of the criterion and provide some rationale for its inclusion in this audit tool.

Additional factors that auditors may need to consider when determining whether the system conforms with the audit criteria.

The examples of documents and/or records give guidance about some of the paperwork that would assist in meeting the requirements of the criterion. It must be noted however, that the examples are not suggested as the only or preferred ways of meeting the criterion, nor should they be interpreted as a list which all organisations must have. An organisation may have different ways of meeting the requirements of the criterion and the examples should not detract from this.

⑤ The examples of questions are included to help auditors determine whether an organisation is meeting the requirements of the criterion. The questions are intended as a supplement only, and do not try to cover all aspects. It is expected that there are many questions that would be asked in addition to the questions listed here.

⑥ The examples of walk around provide guidance about what might be observed in the workplace which would provide confidence that the organisation is managing the requirements of the criterion. In a health and safety audit, these observations may be necessary to demonstrate that the management system is providing a particular level of safety. Again, it is noted that these examples are not intended to be a comprehensive list of items that might need to be checked in a particular workplace.

Note: The absence of an example of documentation, questions, or walk around information does not mean that there is no documentation to see, question to ask or observation to be made in the workplace – eg for criterion 3.9.1 no walk around guidance is offered but due to the wide range of potential issues that could be observed in the workplace, there would be an expectation of significant workplace observation being required by an auditor auditing this criterion.

Element 1: Health and safety policy

1.1 Policy

1.1.1

Senior management in consultation with all employees and/or their representatives shall define and document its policy for, and commitment to, health and safety. The policy shall be endorsed and supported by the most senior management within the organisation – eg the Chief Executive Officer or Managing Director. The health and safety policy shall be developed consistent with relevant legislative requirements and include a commitment to:

a. the risk management process and ensure consistency with the nature of workplace activities and scale of health and safety risks

b. comply with relevant health and safety legislation and other requirements placed upon the organisation or to which the organisation subscribes

c. establish measurable objectives and targets for health and safety to ensure continuous improvement aimed at elimination of work related illness and injury

d. provision of appropriate health and safety training to all employees

e. the consultation process to ensure all employees are included in the decision making where there is an impact on workplace health and safety

f. the dissemination of health and safety information to all employees, contractors, labour hire employees and visitors to the workplace

g. effective implementation of the health and safety policy.

	A meaningful health and safety program depends on commitment from management. The health and safety policy or an equivalent is the primary document in the health and safety management system. It must clearly set out the intentions of the organisation with respect to continuous improvement of health and safety.
	• An authorised copy of the policy document that clearly states health and safety objectives and an organisational commitment to both legislative compliance and improving health and safety.
	• Can senior management explain the objectives of the health and safety policy? • Can evidence be provided that confirms the policy has been sighted and approved by senior staff and other officers?

1.1.2

The health and safety policy is available to other interested parties, including regulatory authorities, suppliers, contractors, and those visiting the workplace.

> The company's health and safety policy communicates its commitment to health and safety and is freely available to all other interested parties with which it deals. This demonstrates to suppliers and contractors the level of support they can expect. The policy would normally be displayed in a prominent position in the organisation as a constant reminder of the company direction.

- An electronic copy of the policy on the organisation's webpage.
- Policy contained in the organisation's annual report.
- Policy included in induction material.
- Policy included in tender documentation.

- How are contractors and their workers advised about the health and safety policy?

- Policy on display in reception/visitor areas.

1.1.3

The health and safety policy is maintained and reviewed periodically to ensure it remains relevant and appropriate to the organisation's health and safety risks.

> Changes to the structure or operations of an organisation may affect the way health and safety is managed. The health and safety policy must reflect the organisational structure and the current allocation of responsibilities. Reviews should consider changes to the legislative requirements, industry technology and business focus.

- The outcomes of the review process should also be used to modify and amend system's components – eg objectives, responsibilities, planning arrangements, procedures and instruments (tools and forms) to ensure their relevance, currency and continuous improvement. The resources provided to support health and safety policy provisions should be assessed and reviewed regularly to evaluate their adequacy.

- Health and safety and associated policies containing dates of latest and proposed reviews.
- Policy postdates legislative or organisational changes.
- Minutes of management review meetings that record discussion of policy.

- Can management explain when the policy was last reviewed, what triggered that review and when the next review is scheduled?
- Who approves the policy after it is reviewed?

Element 2: Planning

2.1 Legal requirements and practical guidance

2.1.1

The organisation identifies and monitors the content of all health and safety legislation, standards, codes of practice, agreements and guidelines relevant to its operation.

The organisation should keep abreast of all legislation and other requirements applicable to, or affecting its operations – eg the organisation may have agreements with contractors, suppliers, customers and industry/worker associations. The content needs to be understood so that it can be applied within the organisation. Health and safety Acts, Regulations and associated standards are subject to change, so the organisation also needs to have processes that ensure the changes are identified and applied. Outdated information needs to be discarded or marked in some way to indicate that it is no longer current.

- A documented procedure that specifies how health and safety legislation and other relevant information is identified and maintained.
- Associated responsibilities allocated in job descriptions.
- Participation in a specialised subscription service that monitors legislative changes and issues updates or bulletins.
- Demonstrated access to web based information providing legislative information updates and changes.

- Is the organisation represented at industry association meetings?
- Do they correspond or regularly connect with legislators and/or contribute to emerging health and safety standards and issues in the industry?

- A library or dedicated collection on site.
- Evidence of subscription service.

2.1.2

The organisation's procedures, work instructions and work practices reflect the requirements of current health and safety legislation, standards, codes of practice, agreements and guidelines.

The organisation has an obligation to ensure compliance with current legal requirements and to be aware of other technical or industry standards and codes of practice which may influence the way work is planned and performed.

- A procedure for creating and reviewing procedures and work instructions that checks applicable legislative and other requirements.
- Procedures and work instructions that reference current requirements.

- Can the relevant manager(s) explain how the organisation ensures that procedures meet relevant requirements?

2.1.3

Relevant personnel in the organisation are advised of, and have ready access to, current relevant health and safety legislation, standards, codes of practice, agreements and guidelines.

> ⓘ Individuals should be aware of how to access the information relevant to the work they are undertaking. The organisation also needs to actively notify affected persons and workplace parties, so that the necessary activities or actions can be taken to ensure continued compliance or make appropriate changes to procedures.

📄
- Distribution lists for particular information, topics or issues.
- Copies of advisory memoranda.
- Minutes of meetings that record discussion of new requirements.

❓
- Can workers nominate the location or contact person for reference information?

↻
- Current information maintained at an accessible location – eg at a library, on microfiche, in the health and safety department or electronically.

2.1.4

The organisation and/or individual satisfies legal requirements to undertake specific activities, perform work or operate equipment, including any:

a. licence

b. certificate of competency

c. notification

d. registration

e. approval or exemption

f. other relevant requirements.

> ⓘ The organisation needs to identify and meet current legal requirements for the operations that it undertakes or equipment that is held or operated including:
> - hazardous chemical storage, manufacture and transport
> - registrations of high risk plant – eg pressure vessels, cooling towers, cranes and lifts
> - licences or approvals for certain processes – eg asbestos removal, use of carcinogens, radioactive sources and lead
> - electrical work
> - operation of particular types of industrial equipment – eg fork lift trucks
> - rigging operations
> - licensing and registration of vehicles
> - relevant driver's licences.
>
> These and others may be applicable depending on the extent of the business and the jurisdiction in which it operates.

- A list of the applicable site licensing or registration requirements with matching records.
- A register or record of licence holders.
- A list of plant requiring registration and copies of current registrations.
- Copies of licences.
- Correspondence from legislative authorities.

?

- Can the relevant manager(s) explain how licences and similar documents are kept current?
- Can relevant workers nominate the legal requirements for specific work or equipment?

- Licences/certificates carried by users of mobile plant.
- Registration certificates displayed on plant.

2.1.5

Changes to health and safety legislation, standards, codes of practice, agreements and guidelines generate a review of existing procedures.

(i) The organisation should conduct a systematic check of legislative changes and updated standards or codes to identify whether any alterations are needed to the current methods of work.

- An information management procedure which requires reviews of procedures and work instructions in response to new information.
- Copies of procedures and work instructions which reference current legislation, standards and codes.
- Minutes of meetings where the organisation's current work practices are reviewed against the latest industry or legislative requirements.

?

- How can you demonstrate that you do this?
- Can you give some examples?

2.2 Objectives and targets

2.2.1
Health and safety objectives and targets consistent with the organisation's health and safety policy are documented, are appropriate to the organisation's activities and consider:

a. legal requirements

b. standards, codes and guidelines

c. health and safety hazards and risks

d. past health and safety performance (as defined by the organisation's system requirements)

e. technological developments

f. leadership and worker participation.

Any objectives need to consider all the issues that can impact on the setting of health and safety objectives and the achievement of targets. A risk assessment approach can be used to prioritise action. The involvement of workers in the setting of goals and objectives is encouraged. The objectives and targets must also be tailored to the organisation's risk exposure and give consideration to workers, the working environment and locations, technology and any current information about the risks. The organisation may also consider safety culture and the external business environment.

- Minutes of meetings which record discussion about the selection of suitable health and safety objectives and targets, and the review of prior health and safety performance.
- Health and safety objectives, and targets reference the standard to be met – eg legal requirement or technical requirement.
- Safety culture survey results influence the development of objectives and targets.
- Objectives and targets reflect senior management involvement.

?
- Who was involved in the setting of the objectives and targets?

2.2.2
Specific health and safety objectives and measurable targets have been assigned to all relevant functions and levels within the organisation.

The organisation should determine its objectives and develop measurable targets which meet these objectives. Commitment to achieving these outcomes would be expected to be incorporated in the company's health and safety policy. The targets must be achievable, measurable and integral to the organisation's everyday work. Targets need to be set across all functions of the organisation (including operations, administration and sales) so that safety is viewed as a part of routine activities.

- Minutes of meetings which record discussion of health and safety objectives and targets.
- Health and safety plan which lists objectives and targets to be met by particular departments for given time frame – eg:
  - **Objective:** Eliminate injuries associated with forklift trucks.
    Target: Zero injuries in a financial year.
  - **Objective:** Provide health and safety induction training for all new workers.
    Target: Induction training to be provided to 100% of workers in the first week of employment.
- Business and individual performance plans which detail specific targets for health and safety and how they will be measured.

- How are objectives and targets measured?
- Do you record the measurement?
- Which functions have been determined as relevant for the development of objectives and targets?
- Can line managers explain how objectives and targets cascade through the organisation and demonstrate how it's achieving the health and safety plans?
- Can line managers explain how they contribute to the development of objectives and targets?

- Notice boards displaying objectives, targets and information on progress to meet the objectives and targets.

2.2.3
The organisation sets health and safety performance indicators that are consistent with its objectives and targets.

> Measurement of health and safety performance should extend beyond statistics relating to injury numbers or injury rates – ie negative indicators. Whilst these are vital, they provide information after the event. Positive or lead indicators are measures of actions taken to prevent injury and disease – eg the number of inspections conducted, training provided, or risk assessments conducted, which demonstrate progress on preventive actions.

- Suitable performance indicators are included in performance appraisals.
- Both positive and negative indicators are used when measuring progress against the health and safety program.
- Health and safety plan which lists health and safety performance indicators/measures to be met by particular departments – eg:
  - percentage of injuries associated with forklift trucks
  - percentage of new workers given health and safety induction training in first week.

- What performance indicators have been set?

2.3 Health and safety management plans

2.3.1

In addition to defining the means by which the organisation will achieve its objectives and targets, the health and safety management plan(s):

a. responds to legal requirements

b. is based on an analysis of information relevant to the nature of the organisation's activities, processes, products or services

c. takes account of identified hazards and health and safety management systems failures

d. aims to eliminate or reduce workplace illness and injury

e. defines the organisation's priorities

f. sets timeframes

g. allocates responsibility for achieving objectives and targets to relevant functional levels

h. states how the plan will be monitored.

In order to achieve systematic and sustainable improvements in health and safety, the organisation needs to plan and organise the activities. Sometimes the complexity of an operation or organisational change requires specific detailed plans to be developed to augment the general health and safety plan. All relevant available information should be evaluated prior to the development or review of health and safety plans. Information gained through hazard identification and risk assessment will provide a firm foundation for a strategic plan. Accident and incident records will highlight problems which need to be addressed in such plans – eg if records indicate that hazardous manual task type injuries are the most likely to occur, then improvements may be indicated in the way a hazardous manual task is addressed at the workplace.

Other information – eg the results of worker surveys or the planned introduction of new technology, may need to be considered in health and safety plans. Information from external sources also provides vital input. Such information may range from the specific requirements of health and safety legislation, standards and codes, to industry knowledge and experience with the processes or products involved.

Some tasks within the plan will be more important than others, some tasks will be easier to achieve and some will require additional staff members or other resources. The plan needs to identify all these factors, including the persons who are allocated prime responsibility for ensuring that each task is completed, and what measurements will be acceptable as an indication that the task is complete.

- Hazard, incident or other health and safety data/records which match the issues covered in the health and safety plan.
- A documented health and safety management plan which references particular legislation, Australian or industry standards or codes.
- Minutes of meetings which record the sources of information used in the development or review of the health and safety management plan.
- A documented health and safety management plan which includes objectives and the means by which those objectives will be achieved through the allocation of resources, completion dates, and responsibilities.
- A series of documented plans or projects developed to address a particular activity.

| ? | • Are staff aware of the health and safety management plan and their part in it? |
| ↻ | • Health and safety management plan(s) are available in the workplace. |

2.3.2
The organisation monitors its progress towards meeting the objectives and targets set in the health and safety management plan and takes corrective actions to ensure progress is maintained.

ⓘ	Monitoring of the progress of the health and safety management plan provides an opportunity to: • confirm that realistic targets have been set • revise priorities • reallocate resources to areas that need help.
📄	• Minutes of meetings that record discussion about progress towards health and safety targets. • Regular reports from individual departments about progress towards the set objectives and corrective actions undertaken. • Schedule of monitoring
?	• How does the organisation monitor progress?

2.3.3
The organisation shall ensure health and safety management plans are kept up-to-date by reviewing the plan(s):

a. on a regular basis

b. when there are changes to the organisation's activities, processes, products or services.

ⓘ	Changes are inevitable, whether generated by new technology, internal restructures or imposed through different or difficult operating conditions. The organisation needs to make sure that the planning process anticipates, considers and incorporates changes where necessary so that objectives can still be met.
⚑	• Reviews should be conducted regularly at appropriate intervals to ensure continuing suitability and effectiveness of the system to satisfy the organisation's health and safety needs in all areas of business activity.
📄	• Dates of reviews found on minutes, memos or other documents. • Reports of findings from reviews.
?	• What circumstances generate a review of the health and safety management plan?

Element 3: Implementation

3.1   Structure and responsibility – Resources

3.1.1

Financial and physical resources have been identified, allocated and are periodically reviewed, to enable the effective implementation and improvement of the organisation's health and safety management system.

> **ⓘ** To achieve the objectives of the health and safety management system, it needs to be adequately resourced and those resources should be directed towards the reduction of the organisation's health and safety risks. The level of resources also needs to be reviewed at regular intervals. Physical resources can include the reference library, monitoring equipment and suitable facilities for health and safety training.

📄
- Resources are identified and allocated in system documentation – eg health and safety management plan.
- Reports, minutes of meetings and other documents that confirm resources have been reviewed.
- Physical evidence of the allocation of resources – eg new equipment, modifications to plant and training facilities.
- Budget information that demonstrates allocation of health and safety resources to implement, maintain and improve the system.

?
- Are financial resources directed towards higher order controls which will reduce risk – eg engineering?

3.1.2

There are sufficient qualified and competent persons to implement the organisation's health and safety management system as identified through documented review.

> **ⓘ** A successful health and safety management system requires access to specialist advice and guidance. Employing specialised staff within the organisation should provide advantages – eg having an understanding of the operations and workers, and being able to keep and use the knowledge gained from working with health and safety issues at the workplace. Advice and guidance can also be obtained from a variety of sources such as health and safety consultants, occupational physicians, ergonomists, engineers, chemists and hygienists.

📄
- Documentation for health and safety staff members that shows their qualifications and experience.
- Reports of health and safety advice received from external providers – eg noise and plant assessments.
- Contracts with health and safety professionals to provide specific services – eg health surveillance and medicals.

?
- How did the organisation determine that they have access to sufficient qualified and competent persons?
- What are the qualifications and competencies of the persons?

3.2 Structure and responsibility – Responsibility and accountability

3.2.1

Senior management understand the organisation's legal obligations for health and safety and can demonstrate how they fulfil them.

> It is essential that senior management are aware of their legal obligations for health and safety in relevant jurisdictions and have an understanding of how to go about meeting those obligations.

- Management must meet its obligations, so far as is reasonably practicable, to provide a safe and healthy workplace for workers or other persons by ensuring:
  - safe systems of work
  - a safe work environment
  - accommodation for workers, if provided, is appropriate
  - safe use of plant, structures and substances
  - facilities for the welfare of workers are adequate
  - notification and recording of workplace incidents
  - adequate information, training, instruction and supervision is given
  - compliance with the requirements under the relevant health and safety regulation
  - effective systems are in place for monitoring the health of workers and workplace conditions.

- Recent due diligence training record(s) for all level of management.
- Letters and memoranda from senior managers concerning legal requirements.
- Records of attendance and course details for relevant health and safety training attended by senior management.
- Documentation provided to senior management explaining the legal obligations they have.

- Can senior management explain their organisation's health and safety legislative obligations?
- What type of training has senior management undertaken?

3.2.2

A member(s) of senior management or the board of directors has been allocated overall responsibility for the health and safety management system and reports (to that group) on its performance.

> Senior management should demonstrate an understanding of the current health and safety performance of the organisation. This is most likely to occur if a member of the senior management group or board has overall responsibility for the systems that manage health and safety.

- A senior management representative(s) should be identified with responsibility, authority and accountability defined, for ensuring the health and safety management system is implemented and maintained.

- Document that confirms allocation of health and safety management system responsibility to a senior manager or board member.
- Organisation chart that shows a senior manager or board member has responsibility for the health and safety function.
- Minutes of management review meetings chaired or attended by the person responsible for the health and safety management system.
- Minutes of board meetings that record the tabling of relevant information or reports.

?
- Is there a senior manager or board member with health and safety responsibilities?
- When was the last time that the appointed person reported on health and safety management system performance to the senior management group and/or board of directors?

3.2.3
The specific health and safety responsibilities (including legislative obligations), authority to act and reporting relationships in the organisation have been defined, documented and communicated.

The organisation needs to implement arrangements to meet its general and specific health and safety legislative responsibilities – eg nomination of management health and safety representatives, registration and maintenance of plant, training, supervision, health monitoring and reporting, record keeping, notification of incidents or participation in consultative arrangements. People also need to understand their role within the health and safety management system. This requires the organisation to provide detail to their workers about actions required to meet the allocated responsibilities.

The authority to act is the defined permission or approval for carrying out a task or duty – eg authority to cease an unsafe work practice and to approve the implementation of a corrective action.

- Responsibility and authority for health and safety should be defined in position descriptions or aggregated in a format that is readily accessible by the position holder.
- Responsibilities should be detailed in documentation that reflects the specific health and safety activities undertaken by the position holder.

Detailed or specific responsibilities and reporting relationships defined and allocated in (but not limited to):

- the health and safety policy
- health and safety agreement
- health and safety manual or work instructions
- contract/tender documents
- position descriptions
- organisation structure or chart
- responsibility matrix.

?
- Can people demonstrate knowledge of their health and safety responsibilities?
- Do people know the health and safety responsibilities that have been assigned to other people?

3.2.4

Where contractors are utilised in the organisation, the health and safety responsibilities and accountabilities of the organisation and the contractor(s) have been clearly defined, allocated and communicated within the organisation and to the contractor(s) and their workers.

Many organisations use contractors to provide services. Although the employment conditions of contractors may vary considerably from those of other workers, the organisation still owes a duty of care to contractors and their workers. The contractors also have obligations. To avoid confusion and prevent incorrect assumptions, the responsibilities and accountabilities for health and safety should be sorted out between the parties prior to work commencing and ongoing, as required. For instance, the contractor and the organisation should define which party will take responsibility for control of the working area, systems of work, plant and equipment, hazardous chemical use, storage and disposal, induction training, supervision, resolution of issues, and first aid facilities. Having done that, the organisation should make sure that all relevant parties are informed of the health and safety arrangements.

- The responsibility, authority and accountability of contractors, and labour hire workers to carry out health and safety management system requirements, should be defined. Appropriate training should be provided to ensure they are competent to meet the system requirements.
- The organisation should define an accountability process to ensure that responsibilities are performed effectively.

- Position description for contract manager which describes responsibilities for sorting out the various health and safety responsibilities and communicating that information.
- Signed contracts which define the persons responsible for each of the health and safety actions and activities to be undertaken and facilities to be provided.
- Information on responsibilities provided to workers and contractors.
- Induction program for contractors covering responsibilities and accountabilities.
- Contractor review procedures incorporate health and safety performance review against agreed responsibilities and accountabilities.

- Can workers explain their responsibilities to contractors?
- Can contractors and their workers explain their health and safety responsibilities to the organisation's workers?

3.2.5

Workers are held accountable for health and safety performance in accordance with their defined responsibilities.

There needs to be some measurement of whether managers, supervisors, workers and others in the workplace are meeting their allocated health and safety responsibilities. A formal review of performance should include measurements of health and safety achievements against the assigned responsibilities.

- The roles and responsibilities are periodically reviewed.
- The organisation should define an accountability process to ensure that responsibilities are performed effectively.
- Performance reviews are monitored against health and safety roles and responsibilities.

- Documented individual health and safety performance appraisals or reviews for workers with health and safety responsibilities.
- Group performance schemes which evaluate health and safety performance.
- Notes or records of interviews where health and safety performance has been discussed.

- Has there been any assessment of health and safety performance of individuals in line with their allocated responsibilities?
- Can workers explain how they are held accountable for their allocated health and safety responsibilities?

3.3 Structure and responsibility – Training and competency

3.3.1

The organisation has a procedure for identifying and defining the health and safety training needs of employees, contractors, labour hire employees or visitors, where relevant.

An organisation needs to determine the competencies or qualifications, training and experience required by their employees and others for the safe performance of the various tasks at the workplace. This includes volunteers where these people work on a regular basis with the organisation. Even contractors who are engaged to perform specialised work may require additional in-house training to participate in certain tasks – eg maintenance. In situations where a contractor has developed such a training plan for its workers, the host organisation needs to have access to a copy of this plan.

It also follows that there must be a process for matching individuals against the competencies, and providing extra training where needed.

Competency based training focuses on training individuals to perform actual jobs in the workplace. The training needs analysis should identify:

- what people need to do in their jobs
- what people need to know to do their jobs
- the standard of performance required in the job
- how, when, where and by whom assessment will occur.

The training should include all aspects of work performance and not just narrow task skills. Workers should be able to transfer and apply skills, knowledge and attitudes to new situations and environments as a result of training.

- Health and safety competencies (skills, knowledge, experience and qualifications) for all levels of the organisation should be identified and documented as a competency profile for all workers or positions including senior management, line managers/supervisors, operations staff, those with specific responsibilities – eg first aiders, fire wardens and safety representatives. The identified competencies should take into account the work activities of the organisation and any risk associated with the conduct of such activities. Training requirements should be at a minimum, the gap between the training need for the position and the established competency of the individual to safely perform the task.
- The training needs analysis acknowledges the information and training necessary to close the skill gap (including accredited qualification and/or legislative requirement).

- Job descriptions detailing skills/competencies required.
- Training needs analysis.
- Task/skills/training matrix showing individual competencies and further training needs.
- Personal development plans for individuals.
- Results of work performance assessment of workers for specific tasks.

?
- How were training needs determined?
- How are workers and volunteers assessed?
- Do staff members have the competencies identified as required?

3.3.2
The organisation consults with employees to identify their training needs in relation to performing their work activities safely.

> ⓘ Consulting with employees to clarify training needs will not only identify training gaps but provide information about opportunities for further improvement or enhancement of job performance.

- Consultative mechanisms include health and safety training requirements and these are reported at health and safety meetings or other appropriate forums.
- Consultation regarding training requirements can be discussed at consultation forum/meeting (eg toolbox talks) and recorded in minutes.
- Performance reviews identifying individual training needs.

?
- Can employees confirm that their supervisors talk with them about extra training requirements?

3.3.3
A documented training plan(s) based on training needs shall be developed and implemented.

> ⓘ A written training plan based on the outcome of the training needs analysis should be developed and implemented. The plan(s) should outline when and how the training will be delivered. Provisions for the delivery of training at certain key times in an operational cycle should be identified and performed – eg inductions, following risk assessments, on transfer of workers to new jobs and changes to work processes, plant, technology, materials or substances.

- The training plan describes what training is to be undertaken, what sequence the training will follow, who provides the training and how, when, how often and where this will occur.
- Training tools, materials and/or learning experiences that support competency-based outcomes are included in the training program as are differences in learning, language, literacy and numeracy skills of trainees.

- Organisational training plan.

- Individual training plan.

- Training calendar.

- Skills/competency matrix.

- Training plan documents – eg (but not limited to) forms, checklists, questionnaires and spreadsheets that capture the scope, requirements, evaluation, delivery method, strategy, constraints/limitations, schedule, resources and materials.

- Learning modes including (but not limited to) health and safety manuals, safe work procedures, specialist instruction, computer assisted learning, toolbox talks, on-the-job demonstration and supervision or other resources or techniques essential to achieving competency.

- Can the organisation explain how the current training plan was developed and implemented?

- Can workers confirm that they are aware of the training plan relevant to their position?

- How does the organisation ensure that the training required is delivered?

3.3.4

The organisation trains workers (as appropriate) to perform their work safely, and verifies their understanding of that training.

The organisation needs to ensure that workers undertaking tasks have the competency to perform them safely. This applies to new workers and to those transferring from another site or department. Training must be understood, and applied to actually benefit the organisation and the individual. The training must ensure that those with language, literacy or learning difficulties are able to understand the information. The organisation needs to develop methods by which it can measure the individual's understanding of the learning outcomes and also the ability to apply that new understanding in the workplace. Records of all training should be maintained, including on the job or 'buddy' training.

- The competency of workers including any contractors, or labour hire workers should be assessed before workers are expected to carry out the tasks associated with their position responsibilities.

- Documentation concerning the content of the training and how it is delivered.

- Training program materials that demonstrate attention to differing levels of ability and literacy.

- Training evaluations which match the documented requirements – eg completed tests and supervisor evaluations.

- Job specific health and safety training records for all workers.

- Competency assessments.

- How does the organisation confirm that workers, contractors, or labour hire workers understand the written and spoken components of their training?

3.3.5

The organisation has an induction program for all workers including management, which is based on their likely risk exposure, and provides relevant instruction in the organisation's health and safety policy and procedures.

> All new and transferred workers, regardless of their level of responsibility, need induction in health and safety policy and procedures, emergency plan, accident reporting, hazard reporting and consultative arrangements. The extent of training should be determined by the level of risk associated with the undertaking. An assessment is also needed to determine the briefing requirements for visitors and contractors. This ensures that they are informed of the health and safety requirements at the work-site. The induction requirements will vary according to the site visited and the activities undertaken by the visitors and contractors – eg a supermarket would be expected to have very different procedures to an oil refinery.

- Documentation that outlines the content of the induction training.
- Induction records for all workers, including managers.
- Contractor induction program.
- Records of visitor briefings and contractor inductions.

- Have senior management – eg the Chief Executive Officer, been inducted into the organisation?
- Can workers (including casuals and volunteers) confirm their attendance at induction training?

- Briefing procedure(s) for visitors which, depending on requirements, vary from full site induction to sign-in books and visitor pamphlets or cards.

3.3.6

Training and assessment is delivered by competent persons with appropriate knowledge, skills and experience.

> To deliver effective training, trainers need the skills and knowledge of the task combined with an ability to impart that knowledge and information. The mix of these may differ depending on the type of training and the types of skills and knowledge to be imparted. Assessment of trainee competency needs to be undertaken by persons with appropriate qualifications.

- Training and assessment responsibilities should be designated to competent persons and statements of responsibility, authority and accountability established. Responsibilities should include training delivery, supervision, assessment and/or verification tasks.

- Train the trainer records or equivalent.
- Skills, knowledge and experience of the trainer had been defined and documented.

- How do you determine what the appropriate knowledge, skills and experience of the trainer needs to be?
- How do you check the skills and competencies of those providing training?
- How do you check that the trainer is appropriate to the task?

3.3.7

The health and safety requirements of tasks are identified, applied to the recruitment and placement of workers and tasks are allocated according to their capability and level of training.

> An organisation should only allocate tasks to workers who are capable of undertaking the tasks safely. The skill and training of workers must be matched to the requirements of the task.
>
> The safe performance of some tasks may require the worker to have particular skills and competencies. For example, a plant operator's certificate of competency or demonstrated knowledge or qualification in a particular subject. There are also some tasks where there can be medical requirements relevant to the safe and satisfactory performance of the task – eg one would not assign a person who was colour blind to a task where colour perception was essential to safety.

- A task analysis that identifies the competencies, including the specific health and safety competencies of the task.
- A recruitment procedure that ensures persons chosen to undertake tasks have the necessary competencies.
- Records that identify the training undertaken by workers to enable them to undertake their job safely.
- A return to work process that matches workers to tasks that they can perform safely whilst recovering from injury, illness or other trauma.
- Skills/competency matrix of workers is developed and used to assign individuals to appropriate tasks.
- Job task analysis/workplace assessments or similar process undertaken which identifies the specific requirements, including medical constraints, of tasks undertaken in the organisation.
- Job descriptions or similar which identify the specific requirements relevant to health and safety of tasks to be performed.
- Records of the staff selection process that demonstrate the selection of candidates/job applicants who meet relevant health and safety requirements.

?
- Can the organisation explain on what basis workers are allocated to particular tasks?
- What tasks have been identified as having specific requirements impacting on health and safety?

3.3.8

Management has received training in health and safety management principles and practices appropriate to their role and responsibilities within the organisation, and the relevant health and safety legislation.

> Managers and supervisors should know their legal health and safety obligations. They also need to participate in such things as development of health and safety management plans, the hazard management process, check that hazard control measures function correctly and have sufficient knowledge to ensure that workers under their direction perform the work safely.

- Training program outlines the content of training relevant to managers and supervisor's legal health and safety obligations.
- Training needs analysis identifying training requirements for managers.
- Training attendance records for managers and supervisors in accordance with identified needs.

?
- Have you received health and safety training, when was this and what was covered by that training?
- Can managers confirm they have received health and safety training?
- Can managers explain what was included in their health and safety training?

3.3.9

Those representing the employer and the workers on health and safety matters, including representatives on consultative committee(s) receive appropriate training to enable them to undertake their representative roles effectively.

To be effective, employer and worker representatives need training that covers health and safety management principles, health and safety legislation, and the consultation process. Some jurisdictions mandate the level of training required.

- Suitable training course outline(s).
- Records of attendance for both employer and worker representatives.
- Training needs analysis identifying training requirements.

- Can worker and management representatives confirm that they have attended the relevant training?

3.3.10

Refresher training (as identified by the training needs) is provided to all workers to enable them to perform their tasks safely.

Over time there is a tendency for people to forget aspects of tasks, especially when tasks are not performed regularly. An assessment should be made to determine when refresher training for particular competencies and tasks is needed, and at what intervals.

- The organisation identifies skills/qualifications training requiring refresher training.

- Training needs analysis identifying what training needs refreshing.
- Training plan which contains timeframes for refresher training as appropriate.
- Training records that show refresher training has been conducted in line with the assessment/ training plan.
- Records of processes and/or plant operation skills requiring refresher training.

- Can workers confirm that adequate refresher training is provided in a timely manner?

3.3.11

The training program is reviewed on a regular basis, and when there are changes in the workplace that impact on the health and safety of workers, ensure that the skills and competencies of workers remain relevant.

The training program (including the training needs analysis and training plans) must to be regularly reviewed to ensure the program delivers the organisation's training requirements and determine whether they are still up-to-date and are achieving the desired outcomes. The program and relevant courses should also be reviewed when there are changes to plant or work processes.

- Procedures for the review of training and assessment should be implemented to ensure the effectiveness of programs to meet skills and knowledge requirements of the workplace. Review outcomes should be used to update competency profiles, program requirements, resources and strategies to maintain relevance, currency and continuous improvement.

- Records of training program reviews.
- Examples of changes in training following changes in plant or processes.

?
- When was the last time that the training program was reviewed?
- Can workers confirm that when there are changes to plant or processes that they have received appropriate training?

3.4 Consultation, communication and reporting – Consultation

3.4.1

There are procedures agreed to by workers outlining worker involvement and consultation in:

a. health and safety matters

b. health and safety issues

c. any proposed changes to the work environment, processes, practices or purchasing decisions that impact on their health and safety.

ⓘ
To ensure consistency and gain worker commitment, arrangements for worker health and safety representatives and consultative processes should be documented and communicated to workers. This enables workers to participate in improving health and safety within the organisation. The documented procedures should also define what constitutes a health and safety issue, how issues are to be reported, to whom, and the methods for resolving such issues. An issue resolution procedure reduces the possibility of a health and safety issue escalating into an industrial dispute. The procedure should set out the involvement of the various parties in the workplace – eg workers, worker health and safety representatives, supervisors, managers and also the involvement of any external body when an issue cannot be resolved within the work place.

Workers often have a wealth of practical experience that can be valuable in ensuring that workplace changes are implemented effectively. It is appropriate to consult with the relevant workers when changes are proposed, so that potential health and safety issues can be identified and resolved.

▤
- Documented consultation procedure.
- Terms of reference for a health and safety committee.
- A documented and agreed health and safety issue resolution procedure which is relevant for all parties in the workplace, identifies the various types of health and safety issues that may arise in a workplace and the way of handling those health and safety issues.
- Project documentation that mandates consultation with workers as part of the process.
- Minutes of team briefings/meetings recording discussion on proposed workplace changes.
- Minutes of health and safety committee meetings recording discussion on proposed workplace changes.

?
- Have worker representatives agreed to the formal consultation arrangements?
- Can workers/representatives confirm that they receive information about proposed changes and have an opportunity to contribute or comment prior to the changes being put into place?

↻
- Procedures or flowchart on consultation process and arrangements displayed in the workplace.

3.4.2

The organisation has:

a. in consultation with workers, determined the number of worker representatives required to effectively represent all work groups

b. made arrangements to allow the workers to select those who will represent them on health and safety matters consistent with legislative requirements

c. communicated the consultative arrangements to workers, including names of their worker and employer representatives for health and safety matters.

Effective consultation is achieved when all workers have an opportunity to hear about and raise health and safety issues and concerns. This will be simple in a small workplace, but more complex in an organisation where there are a range of worker skill levels, multiple sites, differing operations and hazards. The number of worker representatives will depend on factors including:

- the overall number of workers
- overtime and shift arrangements
- the number and grouping of workers who perform similar types of work
- the separation of work areas
- the variety of work
- the nature of the hazards at the workplace.

For consultation to be effective, workers need to have confidence in those who will represent them. Therefore workers need to be involved in the selection process.

Communication must ensure all workers are aware of those persons who can help them to resolve health and safety issues and how the process works. Arrangements for worker health and safety representatives and consultative committees should be documented and widely known.

- Minutes of meetings that record discussion of representation arrangements.
- Agreed list of work groups or areas having worker representatives.
- Documented consultative arrangements that provide for workers to elect a representative.
- Meetings which record elections of worker representatives.
- A list of worker representatives.
- Information about consultation and issue resolution arrangements are included in induction or other training.
- Names of worker and employer representatives communicated – eg electronically or included in team briefings.

- Are workers satisfied with the number and representation of worker representatives for health and safety?
- How was the number of worker representatives determined?
- Did workers select their current health and safety representative?
- Can workers name their representatives?

- Election information posted on notice boards.
- Names/pictures of worker and employer representatives posted on notice boards.
- Information about consultation posted on notice boards.

3.4.3

Those who represent workers on health and safety matters:

a. are provided time and resources to effectively undertake this role

b. meet regularly with management about health and safety issues and the minutes of their meetings are available to all workers.

> (i) Workers provide valuable input to the health and safety program. Management needs to demonstrate their support of worker representatives by providing them with opportunities to confer with their worker groups and attend training, and provide access to information and other facilities – eg telephone, photocopier and filing cabinet as needed.
>
> Effective health and safety consultative arrangements require the participants to meet at regular intervals and keep a record of what is discussed. Copies of the minutes should be available to all workers. In some organisations these arrangements may take the form of one or more health and safety committees.

- Evidence of worker representative's participation in:
  - risk assessments
  - health and safety training
  - workplace inspection
  - committee meetings
  - accident/incident investigations.
- Worker and management representatives confirm that meetings are held regularly and according to schedules.
- Minutes of consultative meetings are distributed electronically or by other means.
- Minutes of meetings demonstrate attendance by worker representatives across all shifts.
- Health and safety committee terms of reference which refer to meeting schedules.
- Committee meeting calendar.
- Minutes of committee meetings which match schedules.

- Do worker representatives confirm that adequate support is provided?
- Do worker representatives confirm that they have the time to adequately handle individual worker health and safety concerns raised with them?
- Do workers know where to find copies of current consultative meeting minutes?

- Suitable facilities available for use by worker representatives.
- Meeting schedules and minutes of previous meetings posted on notice boards.

3.4.4

Workers or their representatives are involved in the development, implementation and review of procedures for the identification of hazards and the assessment and control of risks.

> When procedures are developed or reviewed, workers should be consulted and involved in the process. In this way valuable information on hazard identification and control can be gained. The procedures developed from this process are more likely to be accepted by workers due to their involvement.

- Terms of reference for a health and safety committee.
- Minutes of meetings that record discussion relating to the formulation of relevant policies and procedures.
- Examples of working papers that show the worker involvement in development of a relevant policy or procedure.

?
- Can workers or their representatives recall being involved in the development or review of policies and procedures?

3.5   Consultation, communication and reporting – Communication

3.5.1

The organisation's health and safety policy and other relevant information on health and safety are communicated to all workers, and consider language and standards of literacy.

> An effective method for the systematic distribution of information should be developed. Workers need accurate health and safety information to perform their work safely, and the organisation must fulfil its obligations to keep workers informed about health and safety activities and issues. Where there are multiple committees or where organisations have different locations with similar operations, an exchange of health and safety information can be invaluable. Where workers may have difficulty understanding or reading English, the information needs to be translated or directly explained to individuals.

- A documented procedure for information distribution.
- Minutes of regular tool box meetings incorporating a health and safety focus.
- An organisational publication which includes regular articles on health and safety.
- A computer network which provides relevant health and safety information to all workers.
- Designated workplace translators.
- Information presented in languages other than English.
- Record of review of the workforce population to determine the requirements for training/information provision based on language and literacy needs.

?
- Can workers give the location of, or explain the content of the organisation's health and safety policy?
- Do workers receive other relevant health and safety information?

- Health and safety policy displayed on notice boards.
- Copies of health and safety publications/alerts posted on notice boards.
- Health and safety information posted in pictorials or in languages other than English.

3.5.2

The organisation regularly communicates to workers the progress towards the resolution of health and safety disputes.

The dispute resolution procedures need to explain how feedback is provided to workers. The requirement to report progress will tend to encourage action by the responsible parties to resolve matters in a timely fashion. Similarly, where matters are complex and difficult to resolve, workers are more likely to understand the reason for delays. Relying on health and safety committee meeting minutes to communicate information may not always be appropriate. Sometimes, information needs to be conveyed more regularly than the frequency of meetings.

- Internal memos, team meetings or health and safety committee minutes which detail progress on health and safety matters raised by workers.

- Can workers explain what progress has been made on relevant outstanding health and safety disputes?

3.5.3

There are procedures for the exchange of relevant health and safety information with external parties, including customers, suppliers, contractors and relevant public authorities.

To address legal requirements and maintain good business practice, an organisation needs to ensure that there is an ongoing exchange of information with customers, suppliers and other relevant parties. The organisation needs to identify the parties involved and set up lines of communication and systems which ensure the desired exchange of information.

- A strategic assessment of the external parties and what information is required to be exchanged.

  Such information may include but is not limited to:
  - the latest information on product safety – eg hazard alerts, safety data sheets (SDS) or other information on chemicals
  - product recalls
  - instructions for the safe installation, commissioning, operation and maintenance of plant
  - emergency planning information supplied to the relevant authorities
  - a listing of key contacts for exchange of information.
- Communication responsibilities for the acquisition or provision of health and safety information included in position descriptions.
- Purchasing arrangements which require the provision of relevant information and confirmation that it is received.
- Information about chemicals or SDS sought and received from suppliers, or provided to distributors and other customers.
- Minutes of meetings with contractor, customers or suppliers which record the health and safety information being discussed or exchanged.
- Correspondence or other records of communication between the organisation and relevant authorities.

- Does the organisation receive health and safety information from external parties?
- Does the organisation know which public authorities require them to submit health and safety information, and the scope and frequency of that information?

3.5.4

There is a procedure that encompasses health and safety issues for dealing with formal and informal complaints received from external parties.

> (i) Complaints about health and safety issues can originate from external as well as internal sources. Complainants may include customers, members of the public, regulatory authorities, contractors or suppliers. Complaints can be an early warning to the organisation of serious situations – eg product batches which don't meet safety requirements, workers, contractors or customers acting in an unsafe manner, unsafe deterioration of buildings and poorly designed or unhygienic facilities. Formal complaints may be received via telephone, letter, fax or email. Informal complaints may be obtained via a third party, through published works or via meetings. There should be a procedure to collect the details of the complaint and take relevant action. This procedure may be incorporated into other procedures which collect client feedback.

> 📄
> - Copy of procedure for collecting, recording and dealing with external complaints.
> - Examples of correspondence regarding external complaints.

> ?
> - Have you received any complaints from external parties, including from health and safety inspectors?
> - How do you track and deal with complaints from external parties?

3.6 Consultation, communication and reporting – Reporting

3.6.1

Workplace injuries and illnesses, incidents and health and safety hazards, dangerous occurrences and systems failures, are reported and recorded in accordance with relevant procedures.

> (i) Workers in the workplace are often the first to become aware of a health and safety hazard either by direct observation or as a result of things going wrong. There needs to be an effective process for capturing that information. Details need to be recorded so that risk assessment and appropriate corrective action can be taken. This will help to prevent a recurrence or more serious consequences. Records will also provide information about trends which may occur. All staff need to be aware of their role and responsibilities in the reporting and recording process.

> 📄
> - A procedure for reporting injuries, incidents, hazards and systems failures.
> - A shift log book for recording hazards and failures.
> - Completed injury/incident forms.
> - Register of injuries.
> - Copies of hazard and failure records.

> ?
> - Can workers explain when, how and what type of incidents and hazards are reported and recorded?

> ↻
> - Report forms available in the workplace.

3.6.2
Where there is a legislative requirement, injuries, illnesses, incidents and dangerous occurrences are notified to the appropriate authorities within the stipulated timeframes.

> Local legislative requirements may require certain matters to be formally notified to appropriate authorities. These may include specified incidents involving dangerous goods, plant and certain personal injuries and illnesses. The appropriate authorities may include the health and safety regulatory authority and emergency services authorities.

- A documented procedure for injury, illness and incident notification, including the need to notify appropriate authorities.
- Appropriate notification forms.
- Completed notification forms.

- Can the organisation explain what events need to be notified?

3.6.3
Reports on health and safety inspections, testing and monitoring, including recommendations for corrective action, are produced and forwarded to senior management and worker representative(s) as appropriate.

> All workplace inspection programs need a mechanism for fixing the identified problems. Those undertaking the inspections (with specialist input if required) need to provide recommendations on how the adverse condition may be rectified. Senior management and worker representatives need to monitor the inspection process, and be aware of any specific issues or trends which occur at the workplace.

- Inspection reports which record the recommendations for corrective action.
- Distribution listing for inspection reports which includes senior management and the consultative committee(s).
- Minutes of consultative meetings which record the inspection reports as an item on the agenda.
- Minutes of senior management meetings which record discussion on inspection reports.
- Hazard registers or inspection summaries that are sent to senior management and the consultative committee.

- Who forwards the reports and how often?

3.6.4

Regular, timely reports on health and safety performance, including reports against health and safety objectives, targets and management plans are produced and distributed within the organisation.

(i)	All workers in the organisation can benefit from regular information about health and safety performance. It reminds them of the importance attached to the health and safety program, provides positive reinforcement to those who are taking an active part in the process and assists with the timely notification of trends, both positive and negative.
📄	• Health and safety performance reports.
?	• Can workers explain when, how and what type of incidents and hazards are reported and recorded?
↻	• Health and safety performance data displayed in the workplace.

3.6.5

Reports of audits and reviews of the health and safety management system are produced and distributed within the organisation.

(i)	Everyone in the organisation has a stake in the success or failure of the health and safety management system. Where comprehensive formal system monitoring takes place, it is only reasonable to provide reports of those activities to those who have been actively involved with the program's implementation – eg management, health and safety officers, worker health and safety representatives and the health and safety committee. The outcomes also need to be communicated and records kept so that progress can be monitored until the next review is held.
📄	• Audit reports. • Management system review reports. • Health and safety committee minutes which record discussion of results of audits and reviews.
?	• Can managers and worker representatives confirm that reports are distributed?
↻	• Reports displayed in the workplace.

3.6.6

The organisation's annual report or an equivalent document includes information about health and safety performance.

(i)	Health and safety performance indicators may include the highlights of the program, its major achievements, resources allocated, statistical results and plans for the future. By publishing information about health and safety performance, the organisation demonstrates that it ranks the health and safety of its workers with other important outcomes – eg profitability, quality, customer satisfaction and industrial relations. Where possible this should be made publicly available.
📄	• Copy of current annual report or equivalent which includes information on the organisation's health and safety performance.

3.7 Documentation

3.7.1
The organisation's health and safety policy, plans and procedures are documented in a planned and organised manner.

The key health and safety documents must be prepared and maintained so that they can be easily recognised and accessible to the users. It is not always practical to document everything in a single manual. Some information may overlap or be incorporated into other manuals, and some information may be presented in other formats including:

- electronic data
- chemical manifests
- charts and plans
- process information.

Recording and documenting the health and safety management system requires that its planning arrangements, procedures and instruments (tools and forms) should be documented and stored in a suitable print and/or electronic form.

If some of the health and safety documents are dependent on particular data or information in other manuals, the links and location of the references should be clear.

- Health and safety incorporated into quality, corporate or other similar manuals.
- Health and safety information with links to other manuals.

3.7.2

Specific instructions and safe work procedures associated with particular products, processes, projects or sites have been developed where appropriate.

> Sometimes specific instructions and safe work procedures are needed to address complex or detailed processes, products and projects – eg hazardous chemicals management or a particular production line. In other situations the corporate manual may need to be tailored to meet the local requirements of a particular site or facility.

- Specific instructions and safe work procedures should exist where:
  - there are activities carrying a health and safety risk (including those stated in legislative requirements). These may include hazardous work premises and processes, working environments, use of hazardous chemicals and construction work
  - the absence of such instruction would adversely affect health and safety performance
  - there are requirements for specific emergency procedures, the approval of processes and equipment or the certification of staff members to work on certain equipment or be involved in the conduct of certain processes.
- Safe work procedures should be documented in a manner that ensures those involved or exposed to a hazardous process are equipped to conduct work activities in a safe and healthy manner.
- Safe work procedures may include but are not limited to:
  - a description of the activity or process
  - the person or position that has supervisory responsibility for the activity or process
  - a clear explanation, in sequential order, of the steps or stages comprising the procedure or process, potential hazards or safety controls to minimise potential risk for any identified hazard
  - health and safety precautions to be exercised in the course of carrying out the work activities.

3.8 Document and data control

3.8.1
The organisation has a system for creating, modifying and approving health and safety documents and data, and notifying relevant persons of any changes. Obsolete documents and data are identified and retained (where required) for legal and/or knowledge preservation purposes and are removed from all points to prevent unintended use.

Documentation is prepared to assist and guide workers to put health and safety into practice at the workplace. There needs to be a process which ensures that the relevant staff members have input into the creation and approval of documents and data, before they become part of the operating system. Policies, safe work procedures and instructions are typical documents used for this purpose.

To ensure their integrity, any modifications to the documents or the data need to be similarly approved. The next step is to let all the relevant parties know about the new documents or the changes.

Obsolete documents kept for historical or legal purposes should be clearly identified and removed from use so that they are not confused with current versions.

- Procedures to control system documentation including policy, system planning arrangements, procedures and instruments (tools and forms) should be established and maintained. Such procedures ensure:
  - the creation, modification and approval of health and safety documents and data, and notifying relevant persons of any changes
  - documents are legible, dated (with dates of revision), readily identifiable and maintained in an orderly manner for a specified period.
- Responsibility and authority for the creation and modification of documents within the system should be designated to person(s) in authority or those charged with responsibility for particular work activities, operations or work areas. Such responsibilities should be documented in position descriptions, system planning arrangements, procedures and instruments (tools and forms).

- A written document control procedure.
- Procedures which have been signed off by relevant persons.
- Minutes of meetings which record discussion about modified procedures or data.
- Electronic or paper distribution lists which confirm that relevant persons/areas have been notified of, or received modified procedures.
- Documents stamped or otherwise identified as obsolete, under review or draft.

- Can managers/worker representatives confirm that they are informed about changes to documented standards?
- What does the organisation do with obsolete documents?
- How does the organisation determine what documents need to be retained?

- The only documents in user areas are the current versions

3.8.2
Documents and data critical to health and safety shall be clearly identifiable, duly authorised prior to issue, kept legible and include their issue status.

> Because documents and relevant data are subject to change, it is vital that only current versions are known and used. The information must be complete and legible – eg pages numbered. A draft procedure or new version should be easy to identify in comparison with the current authorised version.

- Changes to documented procedures are recorded and communicated to workers. A master list (document control register) or equivalent control procedure should be established and maintained to identify the current revision of documents.

- A document control procedure which defines the type of document covered by the procedure and the required format.
- Documents which are legible, identified, authorised and dated in accordance with the organisation's document control procedure.
- Numbered versions of documents.
- Draft documents appropriately identified.
- Documents which contain references to information such as the organisation's operating requirements for:
  - maximum levels of exposure to noise or hazardous substances in particular areas
  - maximum or minimum temperatures required for chemical storage
  - pressure levels
  - weight limits for racking.

- Can line managers/worker representatives explain how they ensure that they are working with the latest versions?

- Current copies of relevant documents in user areas.

3.8.3
The organisation provides workers with ready access to relevant health and safety documents and data and advises them of its availability.

> In the course of doing their work, staff will need to refer to the content of the organisation's health and safety documentation. The placement of that information must suit their needs, whether it is in hard copy or electronic format. Responsibility should be assigned for the provision and maintenance of this documentation to ensure that it is current and complete.

- A document control procedure that describes the storage and method of updating health and safety documents.

- Do workers know where the relevant health and safety documents are located?
- Have supervisors/workers been notified about relevant data and documents?

- Current copies of relevant documents in user areas.

3.8.4
Documents and data are regularly reviewed by competent persons to ensure their effectiveness, suitability and the currency of the information.

> ⓘ Changes to legislation, equipment, processes and technology will all impact on the information contained in the organisation's policies, procedures and work instructions. All of these documents need review on a regular basis to ensure they remain relevant and reflect the current working methods. Reviewers should not only understand the document and its contents, but be aware of any pertinent background information.

- System documentation including policy, planning arrangements, procedures and instruments (tools and forms) should be regularly reviewed for their compliance to document control requirements.
- Corrective action should be undertaken to address nonconforming documentation. The procedures implemented to control documents should be reviewed and the efficiency with which the system is maintained should be evaluated.
- Unsuitable documents should be removed from the system.
- Relevant position descriptions should contain responsibilities for the review of system documentation requirements.

- A document control procedure which describes the review process.
- Minutes of meetings which record reviews of documents or data.
- Circulation of draft documents which demonstrates input from competent persons.
- Documents reviewed in accordance with a predetermined schedule.

?
- How do you ensure that persons involved in health and safety document reviews are competent?
- How does the organisation ensure the effectiveness of information?

3.9 Health and safety risk management program

3.9.1
The organisation documents its methodology to reduce health and safety risks through hazard identification, risk assessment and development of risk control measures in accordance with the hierarchy of controls and legal requirements.

> ⓘ Uncontrolled hazards have the potential to cause injury or illness to workers and members of the public. The uncontrolled hazards must be identified before action can be taken to reduce the associated health and safety risks. Risk assessment means establishing whether there is a risk associated with the identified hazards. Having identified the hazards and assessed the risks, the organisation needs to establish effective control measures. Any process for controlling hazards should demonstrate consideration of the hierarchy of control.
>
> The organisation needs to establish what risk assessment models may be useful in qualifying and quantifying their risk exposures. Legislative requirements also need to be incorporated into the methodology – eg some jurisdictions mandate factors to be considered in risk assessment processes and prohibit certain control options. The organisation should integrate this formal, systematic process into their daily operations – eg tendering to supply services.

- Documented procedures for reduction of risk across the organisation and its operations using the process of hazard identification, risk assessment and risk control – eg to review plant, equipment and standard work procedures.
- Documented procedures for hazard identification, risk assessment and risk control across the various business activities in the organisation.
- A documented procedure which requires the use of the hierarchy of controls in the determination of control measures.

3.9.2

The organisation has identified the hazards, including public safety hazards that are associated with its activities, processes, products or services; assessed the risks involved; and implemented suitable control measures in accordance with the organisation's methodology.

To identify hazards, the organisation should look at where and how it does business and who could be affected. All foreseeable health and safety hazards should be identified – eg the organisation needs to evaluate the place where the work takes place, the related machinery, raw materials and how they are used in the production process. Hazardous manual tasks must be identified.

Hazards are not limited to the physical environment in which people work and may include psychosocial hazards. Hazards can be introduced through the actual type of work or working arrangements at an organisation. For instance, an organisation needs to examine whether there are sufficient people allocated to perform a task safely under all circumstances including tight time frames and emergency situations. Some monotonous tasks may increase worker frustration and anxiety.

For many workplace hazards, there is very comprehensive information readily available to assist organisations. Regulations, codes of practice, industry and technical standards will provide guidance.

Records of the risk assessment should be maintained to demonstrate how decisions are made on the suitability of risk controls (with reference to the hierarchy of controls). Particular engineering controls should be selected on the basis that they will eliminate or substantially lower the risk to workers. Where an effective hazard control is achieved through a specific work method, safe work practices should be documented in the form of procedures and/or work instructions. The training, supervision, qualifications and equipment needed for the job should be included in the procedure.

This isn't a one-off exercise. Once an organisation is up and running, the hazard identification, risk assessment and risk control process needs to be integrated into functions across the organisation – eg into the planning of new product lines and purchasing of new equipment.

- Procedures for the identification of hazards arising from the conduct of work activities, processes, products or services are implemented.
- Procedures for assessing risk associated with identified hazards are implemented.
- Risk controls are assigned, recorded and implemented.
- Risk controls for all identified hazards are commensurate with the assessed level of risk.

- Can workers confirm their involvement in the process?
- Has information from the organisation's injury/incident records been used to identify hazards?
- Has the organisation sought industry specific knowledge on hazards and causes of injuries and illness?

3.9.3
The hazard identification, risk assessment and risk control process is undertaken by persons competent in the use of the organisation's methodology.

> There are varied risk management methodologies available – eg qualitative risk assessment (using risk chart), risk calculation using a nomogram, process safety review, fault tree analysis, event tree analysis, cause-consequence analysis, failure modes and effects analysis, hazard and operability study (HAZOP), energy models or human reliability analysis. Whatever the methodology used, staff or consultants working with the organisation's methodology must understand how it is used and should have undertaken some instruction or training in the process. Different methodologies are useful for different purposes and the staff or consultants should be aware of the strengths and weaknesses of the methodologies used.

- Copy of internal training records confirming training in risk management.
- Instructions to contracted health and safety professional(s) indicating the type of risk management process(es) used by the organisation.
- Documentation confirming the knowledge of the risk management methodology being used by contracted health and safety professional(s).

?
- Can the relevant person(s) explain the application of the chosen methodology?

3.9.4
The organisation documents all identified hazards, risk assessments and risk control plans.

> In addition to compliance with legal requirements, the recording of risk management activities allows for easy referral, follow up and review. It would be almost impossible to ensure that hazard identification, risk assessments and risk control plans were comprehensive and complete – eg involved the relevant persons and looked at all relevant factors, without keeping some record of that process.

- A Health and Safety Risk Register(s) should be kept that lists all identified risks in the workplace.
- Records should be kept of identified hazards and the measures implemented to control such hazards commensurate with the assessed risk. Documents produced as a requirement of this element should be controlled and maintained in accordance with health and safety management system requirements.

- Hazard/risk register.
- Job safety analyses.
- Risk assessments and risk control plans.
- Safety Case documentation.
- Hazardous manual task risk assessments.
- Hazardous chemical risk assessments.
- Plant risk assessments.

3.9.5
Risks of identified hazards are assessed in consultation with workers having regard to the likelihood and consequence of injury, illness or incident occurring, taking into consideration:

a. legal requirements

b. evaluation of available information

c. records of incidents, illness and disease

d. the potential for emergency situations.

> Risk assessment involves deciding whether it is likely that someone could be hurt by being exposed to the hazards, and how serious the injury or illness might be. Risk assessment should also address the likelihood and severity of incidents associated with the potential for property damage. All the contributing factors need to be identified and examined. Usually, there is extensive information available to assist with this assessment from within the organisation and from external sources – eg other similar workplaces, industry groups or legislators and safety, medical or scientific technical journals. Any known instance where loss of control of the hazard has resulted in injury, illness or other serious outcomes needs review.

- Risk assessments that record or reference the current state of knowledge about the hazard and its potential effects.
- Risk assessments that refer to information in SDS.
- Risk assessments that follow codes of practice and/or advisory standard models.

3.9.6
The level of risk is assessed and used to prioritise the implementation of risk control measures.

> The purpose of risk assessment is to determine the organisation's and the worker's level of risk exposure. Clearly, the higher the level of risk exposure, the more urgent the action to be taken. Priority needs to be given to those risks at the more serious end of the scale, but the organisation needs, also, to discuss and document how and when all the risks will be reduced to an acceptable level. Timeframes for completing corrective actions based on the assessed level of risk are to be documented in the system.

- A risk control plan based on the determined level of risk of each hazard.
- Minutes of meetings that record discussion about priorities.

- Can worker representatives confirm that discussions have been held about the order in which hazards are to be actioned?

- Risk controls implemented according to a predetermined schedule.

3.9.7

Risk management methodology and its associated procedures shall be reviewed and revised where necessary to ensure relevance, adequacy and compliance to health and safety management system requirements.

Continuous improvement in the management of workplace hazards will only occur when questions are asked about the integrity, validity and effectiveness of the mechanisms and processes which are used to manage risk. The organisation needs to schedule regular opportunities to revisit the entire hazard identification, risk assessment and risk control process. When control measures fail to work as expected or incidents occur, there must be a check to determine whether the process was followed correctly, or whether the actual process itself is inadequate, inappropriate or otherwise flawed.

- Review and evaluation of procedures, process and outcomes should include:
  - hazard identification, risk assessment and risk control process
  - effectiveness of implemented control measures.
- Control measures should be reviewed to ensure outcomes of the risk management process are effective, do not introduce additional hazards and are implemented in accordance with legislative and health and safety management system requirements.

- Health and safety plans that schedule a review of the hazard identification, risk assessment and risk control process.
- Minutes of meetings that record discussion about the process used for a particular issue.
- Review documents that report on the effectiveness of the process.

- Can management explain what circumstances prompt the review of the hazard identification, risk assessment and risk control process/methodology?

3.9.8

The organisation has a program for identifying and managing change that may impact on health and safety.

An organisation is more exposed to risk during times of change in the workplace. A number of factors may influence this risk – eg unexpected situations, poorly considered changes to systems of work (either temporary or permanent), movement of workers to new or different tasks, training that lags behind the development of new processes/equipment, introduction of new or different materials and equipment, increased use of contractors during an installation or overhaul, additional pressure on supervisors to maintain outputs and time delays in preparing such things as revised documents, work procedures, or work instructions.

- Change management procedure which requires health and safety implications to be identified and strategies to be prepared.
- Project plans which identify interim arrangements to manage the health and safety risks associated with the introduction of changes.
- Training or workshop/meeting records that record discussions about managing change safely.
- Risk assessments.
- Contingency plans.

?
- What is the organisation's definition of change?
- Can managers explain how change is identified and managed?
- Can workers/representatives confirm that changes are managed safely?

↻
- Additional staffing to cover peak workloads.
- Interim engineering controls or administrative controls – eg fencing, signs or access controls.

3.10 Hazard identification, risk assessment and control of risks

3.10.1
The organisation determines those areas where access controls are required and ensures effective controls are implemented and maintained.

ⓘ Some areas of the workplace environment require restricted entry. Deciding which parts of the workplace need restrictions on access is part of the hazard identification, risk assessment and risk control process conducted at criterion 3.9.2. Restricted access may be required to control the level of exposure to such things as mobile plant, electrical hazards, hazardous chemicals, hazardous machinery and electromagnetic radiation. If an organisation has designated certain areas as restricted, it follows that procedures should be in place to ensure that conditions for entry are defined and access restrictions are enforced.

⚑
- The focus should be on access controls relevant to health and safety as some access controls may have only security implications.

📄
- Hazard identification, risk assessment and control documentation identifying restricted access areas
- Access control procedure and/or register of access controls.
- Site map showing restricted access areas.
- Records of checks done – eg inspection checklist, minutes of health and safety committee meetings or security guard reports.

?
- Can workers indicate the areas which have restricted access and why they are restricted?
- Can workers/representatives confirm that access controls are maintained?
- Do workers know the requirements to enter restricted access areas?

↻
- Sign-in books, security guards, authorised card access or key registers.
- Signs or systems which designate restricted access areas – eg pedestrian walkways and bollards to restrict vehicle access.
- Engineering controls – eg presence sensing devices, barriers and fences, conventional and time delay locks.

3.10.2

Health and safety requirements are identified, evaluated and incorporated into all purchasing specifications for services.

When an organisation engages the services of contractors to perform work on its behalf, it must give special consideration to the health and safety issues involved in the provision of those services – eg a contract may include reference to the people, processes and equipment to be used, the standard of work to be achieved, the legislative obligations to be met, the responsibilities of the various parties, and specify how the contractor is expected to comply with organisational procedures.

- The organisation's purchasing documentation should clearly define the required health and safety specifications for the services being procured. Where contractors or labour hire workers are to be admitted to site, documentation should include but is not limited to:
    - elements of the health and safety management system to be implemented
    - reference to site specific health and safety risk
    - provisions for health and safety induction
    - inspection, test or audit records
    - reports indicating a review of health and safety performance.

- A documented purchasing procedure that outlines how health and safety is considered prior to the decision to purchase services (which may be incorporated into a quality procedure).
- A preferred supplier listing, with information to demonstrate that all contractors on the list have been informed about the organisation's specific health and safety requirements.
- Contract documents that specify the health and safety requirements of the contractor's service delivery.
- A tender process which requires information to be provided about the potential service provider's management of health and safety.
- Information which describes how a service provider is expected to adhere to health and safety policy.

- Can the relevant contract manager/purchasing officer describe how the purchasing specifications are determined?
- What are the company expectations for service contractor's health and safety performance? Where is this documented?
- How is the benchmark for contractor health and safety performance defined?

- Contractors adhering to organisational requirements – eg wearing high visibility vests in designated areas.

3.10.3
The ability to meet health and safety requirements is assessed in the selection of contractors and labour hire employees.

> The organisation should have a process for the selection of contractors and labour hire workers which requires them to provide information about how health and safety is managed. The supplier's management system should address all health and safety issues relevant to the performance of the service required. Ideally the suppliers should provide evidence through audits or inspections that demonstrates an effective health and safety management system is in place.
>
> In some cases it may be necessary to visit the supplier's premises or work sites to assess the effectiveness of the health and safety management systems prior to engaging them to work for the organisation.

- Processes used to select suppliers of services and human resources may include but are not limited to:
  - the identification of applicable health and safety requirements in tender documentation
  - evaluation of submitted tenders for health and safety requirement compliance
  - ensuring health and safety requirements are clearly stated in contractual documentation
  - evaluation of health and safety documentation submitted by the successful tenderer prior to commencement of service delivery.
- Staff responsible for establishing health and safety specifications for services, and reviewing purchasing documentation, should be appropriately skilled and experienced, and where required, carry the necessary qualifications. Such skills, experience and/or qualifications should be defined.
- The competency of contractors and suppliers of labour hire workers to meet health and safety specifications should be assessed by management. Such responsibilities should be documented in position descriptions, system planning arrangements, procedures and instruments (tools and forms).

- A contractor/labour hire selection procedure which requires the provision of health and safety management system information.
- Tender documents for the supply of services which include requirements for the supplier to maintain an effective health and safety management system.
- Documents relevant to management of health and safety obtained from contractors or suppliers of labour hire workers.
- Records of health and safety induction for contractors.
- Records of contractor assessments conducted by the organisation.
- Minutes of meetings that record discussion of contractor health and safety management.
- Recommendations or referrals regarding contractors or suppliers of labour hire workers.

- Can the Contract Manager explain the process for selection of contractors?
- Can the organisation confirm that contractors completed their health and safety induction?
- Have the contractors completed necessary approvals to work on site?

3.10.4

Contractor health and safety performance is monitored and reviewed to ensure continued adherence to the organisation's health and safety requirements or specifications.

> Having documented the health and safety requirements with respect to the provision of services, it remains the responsibility of the organisation to ensure that the contractor provides what is stipulated. This makes good sense from a health and safety point of view and also from a financial viewpoint. Checks should be undertaken before the commencement of work and at defined intervals throughout the term of the contract or service period.

- The type and extent of health and safety control exercised by management should be dependent upon health and safety risk factors and evidence of the supplier's previously demonstrated capacity and performance.
- Records of contracted services health and safety conformance should be maintained.

- A purchasing or contract procedure which describes the methods by which services are to be evaluated for conformance with specifications – eg performance indicators.
- Minutes of contract review meetings that record discussion of health and safety issues.
- Audit reports of contractor safety performance.
- Correspondence with contractors about health and safety matters/noncompliance.
- Recommendations regarding change of preferred suppliers.

- Can the organisation confirm that the safety performance of contractors is checked and can describe how they are done?
- Can the organisation describe the consequences when a contractor does not meet prescribed health and safety requirements?

- Contractors observed to be operating safely.

3.10.5

The organisation determines its health and safety requirements prior to the purchase of goods, and communicates those specifications to the supplier.

Health and safety issues should be considered prior to any purchase of equipment, materials or substances. The organisation needs to consider its legal requirements, relevant standards, the potential impact on affected workers, training requirements, changes to work procedures, personal protective equipment and any other relevant technical data or information.

This helps to anticipate hazards and avoid or minimise the risks connected with the use of the new equipment or materials. Those involved in the selection of new products should check the relevant available health and safety information before making the purchase. The purchase can also generate other health and safety needs at the workplace – eg an item of plant may require operator training, new procedures and work instructions, and perhaps extra supervision for a time. Similarly, a substance at the workplace may require training for users, specific personal protective equipment, modified storage areas, extra monitoring and sampling equipment, and documented procedures. Identifying these additional issues will reduce the likelihood of injury and illness and provide more accurate costing and ensure that resources are available to satisfy those needs.

After the organisation determines the health and safety component of the purchase, the next step is to communicate those requirements to the supplier of the goods.

- Procedures should be developed and implemented for measuring the capacity of suppliers of goods to comply with health and safety specifications as required by the organisation's health and safety management system, health and safety legislation, standards or codes of practice.

- Processes used to select suppliers of goods may include but are not limited to:
  - the identification of applicable health and safety requirements in tender documentation
  - submitted tenderer evaluation for health and safety requirement compliance
  - evaluation of health and safety documentation submitted by the successful tenderer prior to supply of the goods.

- Organisation of purchasing documents and records should clearly define the required health and safety specifications for the goods being procured.

- Where goods such as materials, plant and equipment are procured, the procedures for compiling detailed health and safety specifications should be implemented and should include any compliance requirements – eg those required by standards, legislation or organisational health and safety requirements.

- A documented purchasing procedure that outlines how health and safety is to be considered prior to the decision to purchase.

- A system or listing of relevant health and safety related information that can be accessed by those recommending a purchase.

- Examples of where health and safety has been examined prior to the decision to purchase, including risk assessments, completed pre-purchase checklists which prompt users to identify additional needs, records of meetings with suppliers and user trials of equipment.

- Copies of purchase orders that specify health and safety requirements.

- Purchase orders placed with approved suppliers, providing that approved suppliers have been selected on the basis of their ability to supply the selected products to the required standard.

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- Can workers recall any situations where equipment, goods or chemicals were introduced, and if the necessary changes were made at the same time – eg new instructions, training, changes to maintenance/cleaning routines?
- How are items purchased with petty cash or credit card assessed for health and safety requirements?

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- Products that comply with purchase specifications.
- New equipment purchases comply with relevant national standards.

3.10.6
Procedures shall be established and implemented for verifying that purchased goods meet health and safety requirements and any discrepancies identified are addressed before the goods are put into operational use.

ⓘ After informing the supplier of the required health and safety specifications of products, it is equally important to check that the supplier has delivered items that meet those specifications. Goods need to be checked against the health and safety specifications upon delivery, and before being made available for use. The checks may be done by the person who receipts the good, the purchase originator or the end user.

⚑
- The type and extent of health and safety control exercised by management should be dependent upon health and safety risk factors, and evidence of the supplier's previously demonstrated capacity and performance. Verification procedures should be implemented to ensure purchased goods conform to specified requirements.
- Procedures should be reviewed regularly. Review procedures should ensure relevance and currency of health and safety specifications, health and safety management system requirements, and procedures for identifying the conformance of goods to predetermined health and safety specifications. Corrective actions should be implemented where identified.
- Workers responsible for establishing health and safety specifications for goods and reviewing purchasing documentation should be appropriately skilled and experienced and, where required, hold the necessary qualifications. Such skills, experience and/or qualifications should be defined.

📄
- A purchasing procedure which includes a checking requirement to ensure that goods received match health and safety purchasing specifications.
- Records of checks of received goods against health and safety specifications.
- Checklists specific to goods received which include prompts for health and safety items to be inspected.
- Items received are checked for specific health and safety related faults – eg cracks, incorrect measurement or incorrect fire rating.
- Information on satisfactory/acceptable substitutions.
- Documentation associated with returning goods.

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- How are you made aware of the health and safety specifications?
- Can workers explain how the health and safety specifications are verified?
- How are goods not meeting health and safety specifications dealt with?

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- Central inward goods/receiving and holding area.
- Completed examples of goods received documentation including checklists which verify health and safety checks took place.
- Area for rejected goods to be separated/isolated for return or repair.
- Rejected goods labelled and associated documentation available.
- Records of returned goods.

3.10.7

Hazard identification, risk assessment and the development of control measures are undertaken during the design stage of plant, products, buildings or processes, or when the design is modified.

> Hazard identification and risk assessments should be undertaken whenever the organisation designs new or modified equipment, processes, products, buildings or work areas.
>
> Doing this at the design stage should not only ensure maximum safety, but should also reduce the number of modifications or alterations required during the manufacture, installation or commissioning phase.

- The control measures should incorporate any legal requirements in relation to the organisation's products including:
  - to classify dangerous goods and hazardous chemicals, and develop and supply SDS
  - provide information relating to the safe use of products, and safe operation and maintenance of plant.

- Procedures should be established and implemented to ensure hazard identification, risk assessment and the development of control measures are undertaken during the product or process design stage, or when the process is modified. Design procedures are implemented to ensure:
  a. adequate definition of health and safety requirements in design documentation
  b. designs and modifications meet specified health and safety requirements and verification obtained where applicable
  c. review of the design process.

- Design workers should be responsible (with authority and accountability established), for ensuring that health and safety requirements are incorporated in design processes. This includes ensuring that any products such as plant or facilities comply to legislative requirements and health and safety specifications. Verifiers should be appropriately skilled and/or qualified to identify risk associated with the design process. Their training, qualification, certification and/or experience should be defined in position descriptions, system planning arrangements and procedures.

- Where the design process involves the design of a facility, item of plant or equipment, the design process should be managed through implemented procedures that identify any risks associated with:
  - construction methods – including processes and materials
  - use and maintenance, especially risk arising out of the nature of the design itself
  - removal, demolition or decommissioning activities – especially where there is risk arising from the materials or processes used in the design.

- Project reports that record hazard identification, risk assessment and risk control activities at the design stage.
- Minutes of design review meetings that record discussion of health and safety issues associated with the proposed new work.
- A copy of the hazard and operability study for the design, construction and commissioning is available, signed and dated.
- Safe operating procedures and/or manuals for materials/equipment designed, produced and used in-house or sold by the organisation.
- SDS for substances produced and sold by the organisation.

- Can workers confirm that health and safety issues are examined prior to installation or commissioning of new equipment or other changes?
- Can the maintenance department confirm that new equipment is able to be safely maintained?
- Can plant operators confirm that equipment is designed safely and operates within safe operating parameters?

- Direct observation of newly designed equipment or new processes.

3.10.8
Competent persons verify that designs and modifications meet specified health and safety requirements.

Responsibility should be assigned to competent persons to ensure that all hazards are identified and risks assessed during design or redesign activities. The final design needs to meet the health and safety requirements which have been specified in the project documents.

- Appropriately qualified and competent persons should be allocated clear responsibilities to ensure health and safety requirements are satisfied. Their training, qualifications, certification and/or experience should be defined in position descriptions, system planning arrangements and procedures.
- Records – eg design verification, notification or registration in meeting health and safety requirements, should be maintained.
- The design process should be regularly reviewed to ensure a continuing requirement that health and safety matters are addressed and verified during the design phase.

- A design procedure which requires competent persons to sign off the project.
- Project documentation demonstrating input of competent persons.
- Minutes of project review meetings.

- What has the organisation determined as the necessary academic qualifications, design experience, skills, technical and health and safety knowledge for competent persons?
- How are the person's qualifications recorded/checked (particularly when a competent person is external to the organisation)?

3.10.9
There are procedures to ensure that materials and substances are disposed of in a manner that minimises risk of personal injury and illness.

The health and safety of persons must be considered when disposing of materials or substances. Procedures for the safe handling and disposal of waste materials and substances that address the hazards involved will aid in reducing the risks to workers and others.

- Examples of wastes that may be encountered include demolition materials (eg asbestos, concrete or steel), manufacturing by-products and wastes (eg chemicals, contaminated packaging or spoiled product), biohazards (eg blood, specimens, sharps, radioactive waste or drugs), and obsolete or damaged plant. There may be legislative requirements that need to be met for disposal of some materials and substances. There are also implications for public safety when waste materials are removed from the workplace for disposal that should be considered.

- Risk assessments.
- A procedure that details specific requirements for disposal of identified materials.
- Contracts with licensed asbestos removalists.
- Contracts with waste disposal companies.
- Records of disposal in accordance with procedures.
- Documents which confirm appropriate waste disposal – eg dispatch dockets.

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- Can relevant workers explain the safe methods for disposal?

- Sharps containers.
- Waste treatment plants.
- Spill kits.
- Bund valves and triple interceptor valves in default closed position.
- Appropriate storage methods and areas for surplus/damaged stock awaiting disposal.
- Observation of demolition work or dismantling of equipment which is consistent with safety requirements.
- Clearly marked/signed disposal bins/containers.

3.10.10
Facilities and amenities in the workplace conform, as a minimum, to relevant legislation, standards and codes of practice.

ⓘ An organisation must ensure that its facilities are of an acceptable standard and appropriate to the work undertaken. The facilities must also be maintained to a level which ensures ongoing health and safety. Facilities refer to washrooms, showers, lockers, dining areas and drinking water. There may be specific legislative requirements and details in building regulations and codes.

- Assessment of facilities and amenities required at the workplace.
- Reports that demonstrate assessment of facilities against requirements.
- Completed workplace inspection documents that include a check of the suitability of facilities provided.
- Cleaning/maintenance contracts which cover all amenities.

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- Can workers/representatives confirm that facilities are acceptable and appropriate?

- Observation of acceptable and appropriate facilities and amenities.

3.10.11
The organisation has a program for the safe use, handling, transfer, inventory management and transport of hazardous chemicals.

The risks associated with bulk and packaged hazardous chemicals will usually increase when they are moved or handled in some way. The way that substances are used, handled and their inventory is managed can dramatically influence the risk of illness, injury or damage. One way of reducing the risks is to maintain procedures and/or work instructions to control the work practices, processes, maintenance requirements and workplace conditions under which hazardous chemicals are handled. The safest methods must be determined after thorough assessment and, if relevant, documented to ensure that all workers can use them. Procedures can form the basis for the training of workers.

The hazards involved in the handling, transfer, and transport of hazardous chemicals include hazardous manual tasks, release, fire, explosion, unwanted reaction and personal exposure. Effective inventory management may limit the risks by reducing excessive quantities or unnecessary hazardous chemicals.

The handling, transfer and transport of hazardous chemicals are often regulated by government authorities. An organisation should have procedures which not only describe effective management of these activities but which also meet legal requirements.

This program shall consider the safe use, handling, transfer, inventory management and transport at site by all workers, including contractors.

- Conformance for this criterion requires both evidence that procedures/work instructions have been produced where relevant and that they are in use.

- Copies of relevant legislation.
- Relevant documented procedures – eg procedures or work instructions for decanting, spraying, mixing, or transfer.
- Labels available for application to decanting containers.

- Can workers/contractors/others explain the procedures for transfer/transport of particular substances?
- Can workers point to the location of the written instructions and explain the correct methods for handling particular substances?
- Can persons identify the location of containers available for decanting?
- How is this controlled for small quantities of substances – eg cleaning chemicals, oils or kerosene, that may be carried in service vehicles or sales representative's vehicles?

- Pictorial instructions at point of use.
- Decanted chemicals in marked containers.
- Control measures mentioned in documents are observed to be implemented.

3.10.12
Comprehensive health and safety information on all hazardous chemicals is readily accessible.

Comprehensive safety information needs to be available to all persons that handle or use hazardous chemicals. It should be easy to refer to when needed, so the actual location of the information is crucial. SDS which form part of this information must be less than five years old and contain the relevant safety information to meet legislative requirements. The organisation needs to consider the most effective way of providing the information to the workers and others.

- Guidance relating to the contents of SDS can be found in relevant health and safety legislation.

- Minutes of meetings which record discussion about suitable content and placement of information.
- Responsibility assigned for maintaining currency of information.
- Documents – eg work instructions, which provide direction on accessing appropriate hazardous chemical websites.
- Documents – eg work instructions, which identify the location of hard copy health and safety information relevant to hazardous chemicals.

- Can the relevant workers point to where the information is kept and retrieve the information?
- Can relevant workers explain or refer to the relevant safety requirements for such things as handling, spillage and disposal, first aid or emergency?
- If they don't have direct access, can workers describe the process for obtaining information relevant to hazardous chemicals?

- Current SDS and other relevant information is readily accessible.
- Information is available at, or close to, point of test.

3.10.13

The organisation ensures that hazardous chemicals are stored safely and in accordance with legislative requirements.

> The correct storage of hazardous materials is essential for reducing the risks inherent with these materials. Once the hazards have been identified and the risks assessed, the organisation uses this information to ensure that appropriate control measures are implemented to ensure hazardous chemicals are stored in a manner that reduces the risks posed by those chemicals and complies with legislative requirements.

Comprehensive guidance relating to legislative requirements for storage and handling of hazardous chemicals can be found in the relevant state or territory legislation, Australian Standards and the Australian Dangerous Goods Code.

Examples of storage and handling requirements include but are not limited to:

- segregation of incompatible chemicals and provision for containment of spills
- storage in accordance with manufacturer's specifications in relation to temperature, pressure, atmospheric conditions and shelf life
- control of ignition sources – eg intrinsically safe electrical equipment, flame-proof vehicles, hot work permits, smoking bans
- protection from impact and unauthorised or accidental access
- bulk containers and ancillary equipment are fit for purpose and maintained in accordance with technical standards, and manufacturer's guidelines
- provision of fire protection equipment
- specific legal requirements are met.

- Manual or procedures that identify specific storage requirements for each class/type of chemical.
- Hazard alerts which identify issues associated with the storage of specific chemicals.
- Copies of legislation and associated standards relating to the storage of hazardous chemicals.
- Inspection records of hazardous chemical storage areas.
- Maintenance reports of tanks and spill containment/bunded areas.
- List of materials subject to deterioration and/or use by dates.
- Classification reports of hazardous areas.

- Do workers know which substances are to be kept separate?
- Can workers explain the safe storage requirements?
- How do workers determine if hazardous chemicals are incompatible?

- Impact protection.
- Designated areas designed to segregate incompatible classes of hazardous chemicals and dangerous goods.
- Evidence of spillage control systems in storage areas.
- Flammable liquid cupboards or rooms.
- Adequate ventilation.
- Flameproof and/or intrinsically safe electrical equipment.
- Containers/packages in good condition.
- No incompatible goods stored in close proximity

3.10.14
The organisation has permit to work procedures for use when required.

A permit to work procedure is an administrative control used to reduce the risk of illness or injury arising from particular work situations. They are usually associated with construction, maintenance or cleaning operations. A permit is a formal written authority given to appropriately trained workers, to carry out work in areas where particular hazards or adverse conditions may be present. The permit, issued by an authorised person (not the person doing the work), confirms that the job in question has been assessed and clearly defines the safety precautions to be taken. The procedure must be rigorously enforced. The success of these procedures relies on effective training, supervision and maintenance of any necessary personal protective equipment, access and testing equipment. Permits are typically issued for entry to confined spaces, hot work activities – eg welding, grinding, and introduction of ignition sources in areas where flammable vapours may be present, use of radioactive sources, roof access, working at heights, high voltage installations and digging or trenching operations.

- Permit to work procedures that describe the range of permits, and provide detailed instructions for each type of work, including the responsible persons.
- List of people authorised to issue and cancel permits.
- Completed permits.
- Standard operating procedures that reference the permit procedures.

- Are all relevant persons aware there are some circumstances where work permits are required?
- Can maintenance workers explain the permit procedures?
- Can the authorising officers explain the permit process?

- Copy of permit(s) available at site of work.
- Access/work in operation which demonstrate conformance to permit procedures.
- Signs that designate areas subject to access permit.

3.10.15

Where personal protective equipment is required, it is appropriate for the task, its provision is accompanied by suitable training or instruction, and it is used correctly and maintained in a serviceable condition.

> ⓘ Personal protective equipment (PPE) is sometimes chosen as a permanent or temporary control measure to reduce personal risk exposure to certain hazards in the workplace. It is often used in conjunction with higher order risk controls – eg engineering. The use of PPE should be supported by instruction, training, supervision, regular maintenance and replacement procedures. The effectiveness of PPE as a risk control relies on ongoing administrative processes. It is therefore a lower order, less desirable risk control option.

- Risk assessments.
- Work procedures that specify the type of PPE required for tasks.
- A record of supply and replacement of PPE.
- Records of PPE training and instruction provided to workers.
- PPE maintenance procedures and records – eg for self-contained breathing apparatus.
- Documented medical, physical or other requirements which apply to workers who are required to wear PPE.
- PPE replacement procedure – eg hard hats or goggles.

- Can the organisation explain the choice of PPE as a control measure?
- Can relevant workers explain the PPE procedures for use (including fit), storage, maintenance and replacement?
- Have relevant persons had instruction on the selection and use of appropriate PPE?

- Identification of areas – eg signs where PPE is required.
- Observation of PPE storage practices.
- Observation of correctly fitted PPE.
- Availability of single use PPE – eg earplugs, dust masks or hairnets.
- Fitting instructions provided where PPE is available.

3.10.16

Plant and equipment is maintained to ensure safe operational use and a record is kept which includes (but is not limited to) relevant details of inspections, maintenance, repair and alteration of plant.

> An organisation should be confident that plant and equipment will operate safely under all foreseeable operating conditions. A scheduled inspection and maintenance program will contribute to that aim, and also assist in the prevention of breakdowns and repairs. Schedules may be based on the manufacturer's recommendations, legislative requirements, technical standards, and industry or local experience with the plant and equipment. Keeping detailed records of all maintenance demonstrates compliance and provides hard evidence about equipment performance.

- Maintenance schedules that match manufacturers guidelines and legislative requirements.
- Detailed inspection procedures for all relevant items of plant and equipment including timetables, and checklists.
- A plant register or record for all relevant items of plant and equipment. The record(s) should include, as a minimum, inspection details, maintenance history, alterations and registration details where appropriate. The format could be hard copy – eg files, log books or card index, or it may be a computerised maintenance record system, depending on the needs of the organisation.

- How does the organisation satisfy itself that plant and equipment are safe?
- Can operators confirm plant and equipment is maintained?

- Plant and equipment free of physical signs that would indicate lack of maintenance – eg corrosion, oil leaks, mechanical stress and excessive wear or other damage.
- Completed checklists or logbooks.

3.10.17

There is a procedure for unsafe plant and equipment to be identified and quarantined or withdrawn from service.

> The procedure should ensure that workers and others can report plant or equipment that appears unsafe and which may be in need of maintenance or replacement. Once the plant is confirmed as unsafe, the procedure should enable the identification and timely removal of the item of plant or equipment from service. Methods of isolation may include using a quarantine area, tagging the equipment, attaching a locking device, or removing the energy source.

- Tagging may include reference to danger/do not use/out of service tags.
- Procedures should also identify when and where locks or tags shall be applied and the steps to be taken afterwards.

- A procedure that includes a reporting mechanism and tagging of unsafe plant for removal from service, including the removal of keys from mobile plant.

- Can persons explain how equipment is identified as being unsafe?
- Can persons explain how they would know if an item of plant was, or had been deemed unsafe?
- Can persons explain the process of isolating unsafe plant?
- Where are danger/do not use/out of service tags kept/available?

- Tagging or quarantine procedures in use.
- Appropriate and current tags available/in use.
- Keys removed from mobile plant.

3.10.18

Controls are implemented to ensure the safety of persons (including members of the public) while plant and equipment is in the process of being cleaned, serviced, repaired or altered.

Plant and equipment needs to be cleaned, serviced or repaired periodically and should be in a safe state before it is accessed by workers including cleaners, operators and maintenance workers. Controls should be implemented to reduce the risks associated with the particular plant or equipment and the work to be done on it.

Any such control devices/mechanisms fitted should not be able to be overridden easily – eg by inadvertent contact or deliberate misuse.

Controls may include but are not limited to:

- prevention of inadvertent or accidental start-up, lock-out, disconnection, isolation or blanking
- de-energisation – eg release of potential/stored energy, charge, pressure
- removal of hazardous chemicals or other materials – eg hot water or steam
- environmental monitoring – eg hazardous gases, lack of oxygen, radiation or dust
- barricading, guarding or signage.

- Isolation and lockout procedures for maintenance activities.
- Maintenance access permit system.
- Records – eg logbook of lock out/tag out activities.

- Can maintenance/operations workers describe the isolation and lock out procedures?
- Can workers explain what situations require atmospheric testing prior to entering for cleaning/maintenance purposes?
- What controls are used to protect people from plant and equipment that have stored energy?

- Engineering controls such as teach mode on robot installations, time delay limited movement or inching controls, captive key systems, mechanical movement prevention – eg props, pins or chains.
- Lock out stations.
- Lock out procedures displayed on individual items of plant.
- Locks in use.
- Designated areas for working on mobile plant or barriers available to isolate work area in the event of breakdown.

3.10.19
Competent persons verify that plant and equipment is safe before being returned to service after repair or alteration.

> Repairs or alterations should be completed as specified and normal operating conditions and safety features checked before plant is returned to service. A competent person should be authorised and delegated with the responsibility for ensuring that the above conditions are met.

- Documents which describe the procedure for signing-off repairs including notification of affected persons.
- Lock out procedures which describe the checks to be made before re-start, including the persons responsible for those checks.
- Service records that confirm checks of plant made by designated persons after repair/alteration.

- Can the relevant workers explain what checks are required before plant/equipment is returned to operation?
- Can workers/representatives confirm that plant/equipment is checked for safety before it is returned to operation?
- How are people notified that plant is safe to use after repairs or maintenance?

3.10.20
Safety signs, including regulatory, hazard, emergency information and fire signs, meet relevant standards and codes of practice, and are displayed in accordance with legal and organisational requirements.

> Signs are used to assist with the communication of information about hazards at the workplace and to provide advice about responding in emergency situations. Certain warning signs are required to assist emergency staff and authorities to effectively respond at an incident. An organisation needs to establish which safety signs are required to meet legislative requirements, industry and internal standards.

To ensure a consistent approach and standard of presentation for all safety related signs, organisations should comply with the relevant legislative requirements and/or standards.

- Workplace assessments that report on the standard and type of signs required in the workplace – eg exit signs, pictorial signs, dangerous goods class labels and placards.
- Purchasing procedures that ensure that signs comply with the relevant standard.
- A procedure for review of sign requirements in response to changes of legislation and/or workplace arrangements.
- A report indicating that standards of workplace signs are maintained.
- Workplace inspections which include a check of signs.

- Well maintained signs that meet organisational requirements and are located in the appropriate areas.

3.10.21
There are procedures to ensure that materials are transported, handled and stored in a safe manner.

Inappropriate transport, handling or storage of materials can increase the risk of injuries and illnesses. All aspects of materials handling within the organisation should be managed to reduce the risk to health and safety arising from its operations. The hazards associated with mobile plant are well documented. The organisation should aim for procedures to manage mobile plant which are consistent with legal requirements, industry leading practice and latest technology.

Note: This criterion does not refer to hazardous chemicals as they are covered in criteria 3.10.11 to 3.10.13.

Aspects of an organisation's operations that may be examined under this criterion include:

- loading/unloading operations and use of mobile plant – eg forklifts and cranes
- transfer of materials around a site
- storage in racking (eg safe working load, condition and access) or stockpiles (eg stack height and stability)
- manual handling
- traffic management
- use, storage and maintenance of lifting equipment (eg slings, chains and shackles).

- Risk assessments in accordance with relevant standard.
- A warehousing procedure that identifies safe stacking heights, storage areas, speed limits and lift truck operations.
- Safe mechanical and hazardous manual task procedures for movement of materials.
- Records of inspection and maintenance of racking, pallets, pallet trucks, trolleys and other mechanical aids.
- Records of checks that materials are stored in designated storage areas.
- A procedure for traffic management and an associated traffic management plan.

- Can the relevant workers explain the procedures for safely moving and storing materials?
- Can relevant persons explain how weights of the material they handle are, or can be, determined?

- Designated storage areas.
- Separation of pedestrian traffic from mobile plant operations.
- Safely stacked material.
- Pallets in good condition.
- Safe working loads marked on racking.
- Well designed and well organised storage and retrieval systems, including loading and unloading areas.
- Appropriate access and materials handling equipment available.
- Data plates/load charts appropriate to mobile plant and any associated attachments.
- Safe working loads marked on portable work platforms/ladders.
- Availability of material handling aids – eg pallet lifters, pallet jacks, shrink wrappers, conveyers and hand trolleys.
- Load shifting equipment used in a safe manner.

3.10.22

Workers are supervised according to their capabilities and the degree of risk of the task they are undertaking, to ensure that tasks are performed safely and work instructions and procedures are followed.

> Workers require differing levels of supervision depending upon the complexity of the assigned tasks, the risks associated with those tasks and the knowledge and capability of the individual. Workers who have experience performing the task are likely to be more capable than those just starting out. All these factors should be considered when determining the degree of supervision required.
>
> Adequate supervision will provide some confidence that tasks are performed in accordance with work instructions or procedures. The organisation should determine the resources, the arrangements and individual competencies required to deliver the necessary level of supervision.

- Risk assessments/task analyses that identify the level of supervision required for tasks.
- Evaluations of worker competency to perform assigned tasks, including training records.
- Logbooks.
- On-the-job training procedures that identify the level of supervision required.
- Organisation chart with all reporting lines.
- Job descriptions include the requirement for supervisors to ensure tasks are performed safely.
- Supervision/team rosters which demonstrate resources in appropriate areas at appropriate times – eg for new workers or for high risk tasks.
- Manager and supervisor health and safety performance appraisals.
- Procedural compliance audits.
- Job competency profiles are available for tasks performed by workers.
- Assessments of competency against the job competency profile for all workers.

?
- Can the managers/supervisors explain how the supervisory arrangements have been determined?
- Can workers/representatives confirm that supervisory arrangements are suitable across all shifts and for all types of work?

3.10.23

The organisation has a program to effectively manage the safety of its workers when working at workplaces not under the control of the organisation.

> Organisations that supply their goods or services to external parties, under contract or otherwise, need to consider the health and safety implications of the proposed work. The organisation needs to ensure the health and safety of its workers and others is not put at risk as a result of its activities, whether or not the workplace is under the control of the employer.

Examples of workers relevant to this criterion are community care workers, sales representatives and service technicians. Some of these workers may travel to remote areas or work remotely where communication methods and emergency response arrangements need to be documented and tested for effectiveness. Workers may also use their own vehicles and equipment.

The organisation needs to consider requirements for persons using vehicles or working in short-term locations – eg at the road side to carry out repairs or attend breakdowns, private residences when installing appliances or other product or house calls for medical professionals. Vehicles may need to be fitted with equipment to cope with emergencies – eg fire extinguishers, first aid kits or flashing warning lights. The type and size of vehicle required to carry display items, tools of trade, or product items to and from site should also be considered. Risk assessments to determine vehicle specifications and other requirements for persons working remotely should be undertaken.

Public safety issues need to be included in these considerations, as do the suitability of plant and equipment, training of workers, site specific hazards and legislative requirements.

The organisation may need to liaise with the customer to determine the necessary health and safety arrangements and to assess the environment in which the workers will be expected to work – eg information may be gathered on environmental or other local hazards, what site induction and specific training will be provided, permit to work systems, status of equipment to be used, what supervision will be provided, the name of the manager to liaise with regarding health and safety, the restricted areas and emergency and first aid response provisions.

- Completed risk assessments or checklist-type documents that identify health and safety requirements at customer workplaces.
- Supporting instructions for workers about actions to be taken if a customer workplace fails to meet safety standards defined in checklists.
- Records of training for relevant workers in how to identify health and safety hazards at customer workplaces, and action to be taken.
- Contracts or agreements with customers that include requirements for health and safety.
- Incident/hazard reports, correspondence, records of meetings that deal with customer safety issues.
- Health and safety audits/inspections of customer workplaces – eg checks of host employers for apprenticeship training schemes.
- Checklists around site assessment for persons expected to work in locations beyond the organisation's control on a one-off or short-term basis.

- Can workers explain how their health and safety is considered when they are providing services to their customers off site?
- Can the contract managers explain how health and safety is included in the contract review process?
- What is the process for assessing risk at short term remote worksites such the side of the road or private residences?

- Completed risk assessments/checklists for site visits.
- Emergency equipment fitted to vehicles.

3.10.24

Customer-supplied goods and services used in the organisation's work processes are subject to hazard identification, risk assessment and control prior to use.

ⓘ Customer-supplied goods and services are those which are supplied to the organisation by a customer. The organisation then performs work on that product or uses that service as part of another task.

Examples are raw materials or components supplied by a customer who requires the organisation to mix or process the materials into a product. Repair type industries routinely perform work on customer-supplied goods or products. Testing laboratories provide services involving customer samples, including substances that are hazardous or infectious.

When customer-supplied goods or services are received they need to be assessed for safety in the same way as any other goods or services used by the organisation. This may involve undertaking a hazard identification and risk assessment prior to use. If necessary, customer-supplied product should be quarantined from other products until suitably assessed. Systems are needed which would identify any damage, deterioration, or changes in composition which could impact on health and safety at the workplace.

📄
- A documented procedure which requires that customer-supplied goods and services undergo hazard identification and risk assessment.
- Records of hazard identification and risk assessment for customer-supplied goods and services.
- Procedures and work instructions for safe handling of customer-supplied goods and services.

?
- How does the organisation verify that customer-supplied goods or services always meet the agreed specifications?
- Can the workers/representatives describe the health and safety specifications of the customer-supplied goods or services – eg labelling, packaging, test results or material?
- Can workers/representatives explain what happens with customer-supplied products or services that don't conform to health and safety requirements?

↻
- Quarantine areas for customer-supplied goods or products.

3.10.25
All substances in containers and transfer systems are identified and clearly labelled to avoid inadvertent or inappropriate use.

It is important that raw materials and other products can be easily identified to avoid incorrect use and subsequently any potential harm to people or damage to plant or property. Where this is likely, the packages, containers, tanks and pipelines should carry appropriate labels or other markings to meet the relevant standards and ensure the contents can be identified. In particular, hazardous chemicals must be clearly and durably labelled to ensure the safety of persons required to handle those substances.

Where appropriate, non-hazardous chemicals should be clearly labelled to distinguish them from those that are hazardous. Where substances are decanted into smaller containers, the container must be suitable for the contents and clearly labelled. Labelling must include the relevant safety information.

The organisation should also ensure that any substances which are stored on site are known and labelled appropriately – eg cleaning materials or gardening chemicals which might be stored for use by contractors.

- A purchasing procedure which incorporates checks of all incoming substances to ensure correct supply and clear, durable labelling.
- A procedure to ensure that all substances are appropriately identified and, where necessary, labelled throughout the production process.
- Labels are produced to comply with legislative requirements.
- Records of hazard/quality inspections which check suitability and integrity of labels.

- Can workers correctly identify the contents of all containers and receptacles?
- How is this controlled for small quantities of substances – eg cleaning chemicals, oils or kerosene, that may be carried in service vehicles or sales representatives vehicles?

- Clear identification, labelling and marking on all packages, containers, tanks and pipelines.

3.11 Emergency preparedness and response

3.11.1

Potential emergency situations have been identified and an emergency plan is:

a. developed for the organisation and its workplaces

b. in accordance with legislative requirements

c. regularly reviewed.

Potential emergency situations, which could originate both on and off site, need to be identified so that a suitable emergency plan can be developed. An emergency plan is a mitigative control intended to reduce the risks to health and safety for workers and others and to reduce damage to property in the event of an emergency. Review of the emergency plan ensures that the information on which it is based is current and that it remains effective.

The organisation must ensure that an emergency plan is prepared for the workplace, that provides for the following:

- emergency procedures, including:
  - an effective response to an emergency
  - evacuation procedures
  - notifying emergency service organisations promptly
  - medical treatment and assistance
  - effective communication between the authorised person who coordinates the emergency response and all persons at the workplace.
- testing of the emergency procedures, including the frequency of testing
- information, training and instruction to relevant workers in relation to implementing the emergency procedures.

When preparing and maintaining an emergency plan, the organisation must consider all relevant matters including:

- the nature of the work being carried out at the workplace
- the nature of the hazards at the workplace
- the size and location of the workplace
- the number and composition of the workers and other persons at the workplace.

On-site emergency situations may include:

- a hazardous chemical leak
- a fire
- a bomb threat or other threatening situation
- a medical emergency.

Off-site emergency situations could include:

- a building or a grass fire on an adjoining property
- a chemical leak from a nearby premises
- a company vehicle involved in a road accident.

Documented arrangements must at least cover evacuation procedures and should be developed where possible with the help of expert advice. Workers working alone on or off-site should be considered.

A regular review process will ensure that the procedures remain appropriate to the likely emergencies. It is logical to review procedures when alterations are made to the site or in response to changes in the business environment – eg security alerts. The frequency of reviews may also depend on the complexity of the procedures.

- Risk assessments.
- Emergency procedures manual.
- Schedule of reviews of emergency procedures.
- Emergency procedures which record dates of review.
- Minutes of meetings which record discussion about the suitability of the emergency plan.
- Correspondence/records of meetings with industry experts in the emergency management.
- Documented off-site emergency procedures observed in vehicles or available at the affected site.

- Do persons know the emergency procedures for situations that may be applicable to them?

3.11.2
The organisation has allocated overall responsibility for control of emergency situations to specified individuals and communicated this information to all workers.

When emergency situations arise, there should be persons appointed and ready to manage the situation. The organisation should consider which persons are best suited to take on these responsibilities and let all workers know who they are.

- Responsibility, authority and accountability should be defined for persons performing health and safety activities – eg safety officers, first aid officers or fire emergency wardens. These responsibilities may reside outside of position descriptions.

- An emergency plan showing the names of wardens or emergency controllers.
- Induction process that includes introducing workers to local fire wardens.

- Are workers able to recognise the fire wardens and first aiders in their work areas?
- How is responsibility allocated in off-site situations?
- Is the appointment of fire wardens applicable to off-site situations?
- Are first aid persons available off-site?
- How are persons working alone catered for?
- Are emergency situations in the field able to be handled remotely and what is the procedure?

- Identification apparel for responsible persons – eg helmets or armbands.
- Notices posted of the names of persons with emergency control responsibilities.

3.11.3
Workers receive training and practice in the emergency plan appropriate to their allocated emergency response responsibilities.

To ensure an effective response to emergency situations, all workers need to be trained in the relevant emergency procedures – eg rescue and first aid procedures need to be rehearsed by workers who are required to work in confined spaces. Persons who are appointed to manage an emergency should receive training that will enable them to discharge those responsibilities confidently and competently. Workers also need to have the knowledge and confidence to take immediate action. Practices and rehearsals should cover all emergency situations – eg mock fire situations, medical emergencies or bomb threats.

Consideration should be given to situations unique to working off-site – eg vehicle fire or leakage of chemical from a road tanker.

- Attendance records for general emergency training – eg included in induction.
- Outline of warden training program.
- Attendance records at warden training.
- Schedule of tests, drills or other rehearsals of emergency procedures.
- Records of emergency tests or drills.
- Records of attendance at mock emergency practice drills.

- Can workers/representatives explain what to do in the event of a specific emergency?
- Can workers/representatives confirm that emergency procedures are practised?

- Emergency evacuation plan posted.
- Emergency instructions posted.

3.11.4
Competent persons have periodically assessed the suitability, location and accessibility of emergency equipment, including where changes to layout, equipment or process have occurred.

ⓘ	Appropriate emergency equipment needs to be readily accessible in the event of an emergency. Advice about the type and location of equipment should be sought from competent professionals – eg organisations such as the fire brigade. These persons can advise about the performance of particular equipment and which type will best cope with the range of potential situations, whether for fighting fires, dealing with chemical spills or alerting others where there are threats to personal security.
⚑	• There may be specific legislative or other requirements regarding the provision of emergency equipment and how often assessments of these arrangements are carried out.
📄	• Emergency equipment assessment reports prepared by competent professionals or organisations.
?	• Can the organisation demonstrate that the emergency equipment assessment is still current – ie have any changes been introduced that would affect the location and type of emergency equipment needed?
↻	• Specified emergency equipment located in accordance with assessment. • Spill kits provided with instructions, suitable absorbent material and appropriate personal protective equipment. • Emergency showers and/or eye wash stations are operating and maintained. • Location of emergency equipment is clearly identified. • Access to emergency equipment is not blocked.

3.11.5
Emergency and fire protection equipment, exit signs and alarm systems are inspected, tested and maintained at regular intervals.

ⓘ	Emergency systems need to be regularly inspected and tested to verify that they are working effectively or will activate as required. Emergency equipment may include smoke detectors, fire extinguishers, sprinklers, fire hoses, emergency lighting, evacuation warning devices, spillage containment materials and duress alarms.
⚑	• The inspection and testing intervals for many emergency and fire protection items are specified in Australian and other standards. The standards required by the relevant authority will need to be determined.
📄	• Contracts for inspection and maintenance of emergency equipment, systems and exit signs. • Records of inspection and maintenance in accordance with contracts. • Test results or logbook of alarm tests. • Emergency lighting test logbook. • Records of workplace inspections which check operation of smoke detectors. • Plan that shows location and type of all emergency equipment provided.

- ? • Can the organisation explain the schedule for inspection and testing of all emergency equipment that ensures it remains in operational condition?

- ↻ • Service tags on extinguishers and hose reels.
  - Illuminated emergency exit signs.
  - Records of tests in sprinkler main control rooms.
  - Clearance maintained to emergency equipment, including sprinkler heads.
  - Spill kits complete.

3.11.6
The organisation has a system in place to ensure emergency authorities are informed of relevant hazards on-site (including hazardous chemicals) when attending an emergency.

ⓘ Members of the emergency services may be exposed to any of the hazards present at a site when attending in an emergency. The availability of reliable information relating to the full range of relevant hazards present at the site will assist in reducing health and safety risks and in determining an appropriate response to the emergency situation.

⚐ The organisation should provide information regarding the quantities and locations of hazardous chemicals – eg a hazardous chemical manifest or inventory, SDS and emergency resources available.

Other site-specific hazards that emergency services may need to be informed of – eg electrical hazards, dangerous plant, radiation sources, restricted access or egress, or systems that may activate automatically.

- 📄 • A hazardous chemical inventory database in accordance with relevant legislative requirements.
  - Correspondence with emergency authorities regarding the quantity and classes of dangerous goods/hazardous substances on site.
  - Regular reviews of inventory are conducted.
  - A site plan showing location of confined spaces, drains, excavations, asbestos, unstable ground, and any other local hazards which may be of concern for emergency authorities.
  - Documentation is available for notification to the relevant authority.

- ? • Can relevant workers explain how the inventory is managed?

- ↻ • A copy of the current hazardous chemical manifest in an emergency information box at the vehicle entry to the site.
  - A copy of the current site plan showing the location of all hazards in an emergency information box at the vehicle entry to the site.

3.11.7
The organisation has assessed its first aid requirements and the first aid program is in place.

ⓘ Prompt first aid will minimise the effects of an injury or illness and promote quicker recovery. A proper assessment of first aid requirements will ensure that adequate first aid arrangements are identified. Trained first aiders, first aid equipment and facilities appropriate to the nature of the likely risks should be available.

- There must be consideration for persons working off-site particularly those working alone.

- A current documented assessment of workplace first aid requirements – eg number of first aiders, level of first aider training, number of first aid kits, first aid equipment, special requirements such as antidotes.
- Records of inspections that check first aid facilities.
- Records of first aid treatment.
- Records of first aider training.
- A current documented assessment of off-site workplace first aid requirements – eg level of first aid training, provision of first aid kits, special requirements such as antidotes.

?
- Can the organisation demonstrate the factors taken into account in the first aid assessment – eg previous injuries or illnesses at the workplace?

- First aid kits (including in work vehicles).
- First aid room.
- Eye wash facilities.
- Emergency showers.
- Resuscitation equipment.

3.11.8
The organisation has a procedure(s) to assist workers who are exposed to critical incidents at work.

> A critical incident is any incident which directly or indirectly causes significant distress to a person, either at the time it occurs or later. Critical incident stress management is required in many industries including banking, emergency services and health care.
>
> As part of the hazard identification and risk assessment process, an organisation should identify the tasks or areas where workers may be exposed to critical incidents as a result of their work.
>
> There should be a procedure in place to support and assist workers. Effective system components will include policy, procedures, staff training and the provision for defusing, debriefing and counselling services by appropriately trained staff.

- Risk assessment documentation showing persons or areas where there is a likelihood of work related critical incidents.
- Critical incident stress management policies and procedures.
- Contract with debriefing and counselling services.
- Training program for at-risk workers and records of training.
- Statistics or records of critical incident debriefing and counselling services provided.

?
- What is the organisation's definition of a critical incident?
- How does the organisation become aware of a critical incident?
- Can workers/representatives confirm that the organisation provides support to workers after critical incidents?

- Posters that advertise critical incident services for worker assistance/peer support.
- On-site facilities for counselling/peer support.

Element 4: Measurement and evaluation

4.1 Monitoring and measurement – General

4.1.1

There is a health and safety inspection, testing and monitoring program that incorporates timely and effective corrective action processes.

Regular inspections will identify uncontrolled hazards and unplanned changes occurring in the workplace including plant. Once identified, they must be reported. An assessment will then determine the appropriate corrective action. Responsibilities must be assigned to ensure that corrective actions are implemented and monitored.

Checklists, developed as part of the initial risk assessment activity, provide a useful prompt and promote consistency of approach to the inspections. A checklist needs to be tailored to the particular workplace or site. Generic documents often contain irrelevant items and can overlook vital issues specific to particular areas or operations. For this reason it is a good idea to consult about the development of the checklist with those workers who work in the areas exposed to the hazards.

Inspections should check more than physical hazards in the workplace. The inspection program should:

- check whether the workplace meets legislative obligations – eg appropriate worker facilities and licensed drivers
- check all control measures for effectiveness, particularly those that have been recently introduced as a result of corrective actions for incident investigations or workplace inspections.

- The test and inspection system planning arrangements, procedures, instruments (tools and forms) should be reviewed regularly to ensure ongoing relevance and maintenance in accordance with health and safety management system requirements. Corrective actions should be implemented where identified.
- The inspection, testing and monitoring program may use statistical measures of health and safety management system performance. The cause of adverse trends should be analysed and health and safety program priorities revised to ensure adequate resources and processes to reverse such trends.
- Procedures for the review of testing and inspection records should be implemented to ensure conformance verification and identify corrective actions where nonconformance is recorded.
- Inspection, testing and monitoring procedures should be planned and implemented at key times in the operational cycle and according to procedural requirements – eg materials procurement, routine maintenance, plant installation and commissioning, and standard operating procedures.

- Documented procedures for inspection that include schedules and checklist(s) covering all locations (including mobile and temporary) and hazards, and which requires that persons are assigned responsibility for ensuring that corrective actions are implemented.
- Records of inspections undertaken at regular intervals.
- Plant maintenance/inspection matrix.
- Inspection reports which include details of corrective actions to be taken and by whom.
- Inspection documents which cover checks of safe operating procedures and relevant legislative requirements.
- Minutes of meetings that record discussion on the evaluation of corrective actions arising from inspections.

?	• Can the organisation explain the rationale for the inspection frequency/inspection schedule?
	• Can workers/representatives confirm that an inspection, testing and monitoring program is in place and undertaken?
↻	• Workplace standards appear to be maintained.

4.1.2

Inspections seek input and involvement from the workers who are required to undertake the tasks being inspected.

ⓘ	Workers have valuable on-the-job experience and can provide useful information about the hazards associated with particular tasks. This information is easily obtained if those workers are involved in the inspection process or have the opportunity to provide information to the inspection team.
📄	• A workplace inspection procedure which includes a requirement to consult with workers performing the work.
	• Records of workers' input during inspections – eg minutes of meetings or notes on inspection checklists.
?	• Can workers confirm that they are involved in the inspection process?

4.1.3

Engineering controls, including safety devices, are regularly inspected and tested (where appropriate) to ensure their integrity.

ⓘ	Where engineering controls are used to reduce risk, they should be regularly checked to ensure that they continue to maintain the expected level of safety – eg fixed guards and barriers may be damaged or missing a fixing screw or bolt, interlocked guards may be worn or disconnected, presence sensing systems may require adjustment, emergency stop buttons, trip wires and duress alarms may malfunction, and automatic shutdown or pressure relief devices may fail to operate at critical levels. Ventilation systems may fail to provide the recommended level of performance.
📄	• Maintenance contracts to inspect and test specific engineering controls.
	• Procedure that includes a checklist and schedules for inspection of engineering controls.
	• Completed checklists of plant guarding status.
	• Records or log of tests undertaken on safety devices.
	• Service records of presence sensing systems.
?	• Can workers/representatives confirm that there are regular checks of engineering controls, including safety devices – eg guards and exhaust systems?
↻	• Well maintained machine guarding in place.
	• Other engineering controls appear to be functioning.

4.1.4

Monitoring of the workplace environment (general and personal) is conducted where appropriate and records of the results are maintained.

(i)	The need for workplace monitoring of hazards – eg noise, fumes, gases, vapours, dusts, radiation, cold and heat should be identified during the hazard identification and risk assessment process. Such monitoring may include personal dosimeters as well as static area monitors. The monitoring should be conducted by competent workers and records maintained. Additional monitoring requirements may exist where contaminated air, insufficient oxygen or flammable vapours may be present in a confined space.
⚑	• Records of health and safety inspection, testing and monitoring should be maintained and made available to personnel. Persons responsible for the keeping of testing and inspection records should be identified and their responsibilities defined.
📄	• Procedures for workplace environmental monitoring, including confined space entry. • Records of workplace environmental monitoring.
?	• Can the organisation explain the reasons for the monitoring and how acceptable exposure levels have been determined? • Can the organisation explain the reasons why particular types of monitoring equipment have been selected for use? • Does the organisation's procedure cover the frequency of monitoring and what happens when a deviation from the required level is detected?
↻	• Static monitors in appropriate locations. • Personal dosimeters being worn appropriately – eg radiation badges.

4.1.5

Inspection, measuring and test equipment related to health and safety monitoring is appropriately identified, calibrated, maintained and stored.

(i)	Where specialised equipment is used for health and safety related inspection, measuring or testing, – eg sound level meters, there needs to be a documented process to ensure that the equipment will function as designed and provide accurate and relevant readouts. The equipment needs to meet relevant standards and be calibrated and adjusted accordingly. Storage environments can also affect the integrity of the equipment and its calibration. If the equipment is supplied and used by external consultants, there should be confirmation that the equipment has been correctly calibrated and maintained.
📄	• Documented procedures for the management of health and safety related inspection, measuring and test equipment. • Records of calibration of equipment performed by competent persons in accordance with manufacturer's specifications. • Records of scheduled maintenance in accordance with the manufacturer's specifications. • Storage facilities designed to prevent damage and maintain equipment accuracy.
?	• Can workers/representatives confirm that measuring equipment is checked regularly?
↻	• Current calibration stickers on equipment. • Current calibration certification is available.

4.2 Monitoring and measurement – Health surveillance

4.2.1
The organisation has identified those situations where workers' health surveillance should occur and has procedures to conduct this surveillance. The health of workers exposed to specific hazards is monitored, recorded, reported and action is taken to address any adverse effects.

Legislation may prescribe health surveillance for workers exposed to specified hazards.

Health surveillance, which includes biological monitoring, can assist in evaluating the risk to health from hazardous substances and other hazards – eg noise for which there are known and acceptable health surveillance procedures by:

- determining the dose of hazardous substances absorbed
- detecting the early signs of adverse health effects that may occur due to exposure.

Legislation may require the monitoring of workers who have been identified as having exposure to a scheduled hazardous chemical and where the exposure to the hazardous chemical is such that it is likely that an adverse effect on the worker's health may occur under the particular conditions of use.

It is important that biological monitoring is not used as an alternative to the implementation of control measures. However, monitoring needs to be considered in situations where:

- the risks to health are largely controlled through the lower order controls – eg PPE or administrative controls
- symptoms have been reported which are likely to be related to the use of a workplace substance
- incidents or near misses have occurred
- control measures have deteriorated significantly as a result of poor maintenance.

Results are used as a baseline against which any changes in worker health can be readily identified and appropriate action taken. Legal requirements may also apply to the maintenance and retention of the test results. Individual results must be treated as confidential medical records.

- There may be situations where health surveillance should occur beyond any locally prescribed requirements – eg drug and alcohol testing, hepatitis, eyesight, fitness levels or lung function tests.

- Risk assessments which identify the need for health surveillance.
- Documented policy or procedure for health monitoring/health surveillance program.
- Schedule for screening and testing.
- Records of health monitoring/health surveillance which match scheduled arrangements.
- Records that health monitoring is conducted by competent, and where applicable, approved persons.
- Records that include details – eg name and position of workers, type of monitoring conducted, testing procedure, test provider, and requirements specified in the relevant legislation.
- Records demonstrating that workers are informed of the need for the monitoring and the results.
- Contracts with providers of health monitoring services.

- How has the organisation determined the requirements for health surveillance?
- Can workers confirm that results of medical tests are provided and explained to them?

4.3 Incident investigation and corrective action

4.3.1

There are procedures (incorporating appropriate methodologies) for investigating and implementing corrective action following injuries, illnesses, incidents and other systems failures impacting on health and safety.

> Injuries, illnesses and incidents, including those which are notified to authorities, should be investigated. This is to determine the contributing factors so that similar occurrences can be prevented. Incident investigations should focus on corrective actions, not the allocation of blame. The investigation should involve management representatives – eg supervisors, who have direct knowledge of the relevant work area and work processes.

- The investigation and corrective action procedures may include but are not limited to:
  - hazard reporting
  - reporting of accidents and incidents and their subsequent investigation
  - analysing all health and safety management system processes, work operations, records, service reports and complaints to detect and eliminate potential causes of nonconforming systems
  - implementing corrective action procedures to deal with prioritised health and safety management system failures
  - applying controls to ensure that corrective actions are undertaken
  - establishing procedures for assessing the nonconformances and the effectiveness of implemented control measures
  - implementing a procedure for recording changes in health and safety management system resulting from corrective actions.

- Investigation procedure.
- Fully completed investigation documents which show the involvement of line managers in the process.

- Can the organisation explain who is involved in investigations?
- Can line managers confirm their involvement in investigations?

4.3.2
Investigations shall:

a. be undertaken by a competent person(s) in accordance with the organisation's procedure

b. identify the factor(s) that led to the injury, illness, incident or other system failure

c. review the identified hazards, assessed risks and effectiveness of the control measures

d. recommend appropriate control measures and corrective actions.

> When an incident or more serious situation occurs, there needs to be a re-examination of the system which is implemented to manage the hazard, and whether it is suitable. To do this, the organisation's system needs to ensure incident investigation review the situation from first principles – ie recheck that all the hazards were initially identified, and whether the risks were correctly assessed before the control measures were selected. Investigations too often seek someone to blame when things go wrong, instead of trying to find out what really caused or contributed to the unexpected outcome. The choice of risk controls, system of work, standard of training, supervision and reporting of previous incidents are some of the factors that might need to be considered.
>
> The incident investigation outcomes should specify what remedial action is needed to prevent similar incidents occurring in the future. As some recommended actions may take time to implement – eg training, each recommendation should have an allocated time frame to allow those responsible to schedule their tasks. It would be expected that recommendations would, where possible, concentrate on systems and processes rather than on the deficiencies of individual workers.

- List of competent persons/positions who do investigations.
- Investigation procedures/documents that require examination of root causes.
- Investigation reports that focus on systems rather than personal failure, contain recommendations and refer to checks of existing control measures.
- Review of existing hazard identification and risk assessment documentation.
- Investigation procedures and/or the incident form include provision for recording recommended actions.
- Minutes of meetings that record reviews of control measures and discussions about recommendations arising from investigations.

- Can workers/representatives confirm that investigations try to find out why things have gone wrong rather than blame someone?

4.3.3

Corrective actions are:

a. determined in consultation with affected workers

b. implemented in a timely manner

c. assessed for their effectiveness by assigned personnel.

To ensure corrective actions arising from an incident investigation are appropriate and realistic, it is important to get the input of workers who will be directly affected by those actions. The people closest to the situation may raise issues which had not been considered by the parties recommending the corrective action. There should be a mechanism to inform the affected workers of the corrective action undertaken.

The investigation process will only be effective if prompt corrective action is taken to rectify the identified deficiencies. This is more likely to occur if particular individuals are given the responsibility of making sure recommended action is taken. The control measures also need to be followed up to ensure that they achieve the desired result.

- Corrective action responsibilities should be designated to competent persons and statements of responsibility, authority and accountability established. Responsibilities should include development and implementation of corrective action, review of processes and follow through on identified nonconformances. Management should ensure through implemented processes of review, that corrective action responsibilities are met and that procedural outcomes are properly actioned and followed through.

- Investigation procedures which include a requirement that consultation take place with affected workers prior to implementation of corrective action(s).

- Evidence that affected workers are consulted prior to implementation of corrective actions – eg minutes of meetings.

- Investigation procedures and/or the incident form include provision for assigning individuals to implement corrective actions.

- Records of corrective actions assigned to individuals.

- Records of implementation of corrective actions – eg minutes of meetings.

- Records of review on the effectiveness of implemented control measures.

- Are workers/representatives asked for their opinion on proposed changes after incidents have occurred in their work area?

- Can worker representatives confirm that corrective actions are checked to see if they work?

4.4 Records and records management

The organisation has a program for management of health and safety records including:

a. identification and traceability

b. collection, indexing and filing

c. access and confidentiality

d. retention and maintenance

e. protection against damage, deterioration or loss

f. retrieval

g. disposal.

> An organisation needs to identify what health and safety records it requires to be kept and to determine how they will be collected and stored. The safe and organised storage of records will ensure that they are readily available when required to those who are authorised to look at them. The disposal of the records will depend on the organisation's needs and any specific legislative requirements for their retention – eg health surveillance and risk assessment documentation.

- Some examples of records that should be kept by an organisation are listed below:
    - qualifications, skills, knowledge, competency and certifications
    - induction and training
    - inspection and test reports
    - audit reports
    - internal management system review reports
    - minutes of management review meetings
    - incident/accident reports and investigations
    - minutes of health and safety meetings, including health and safety executive meetings relating to health and safety
    - statistical analysis of health and safety data
    - health and safety action plans
    - safety equipment records
    - dangerous goods and hazardous chemicals inventories
    - design reviews and approvals
    - risk management documentation
    - records pertaining to the engagement of contractors and their compliance with health and safety requirements
    - records associated with supplier compliance including suppliers of goods, services and labour hire.
- The privacy of individuals and confidentiality of records should be accounted for in the procedures implemented for the indexing, filing, storage and retrieval of records. Procedures should be developed for obtaining access and/or releasing an individual's confidential records.

- Responsibility for the identification of record keeping compliance requirements and record keeping provisions should be documented in position descriptions, system planning arrangements, procedures or instruments (tools and forms).
- Procedures for the identification, collection, indexing, filing, storage, maintenance and disposal of health and safety records should be reviewed at appropriate intervals.

- Relevant documented procedure for record keeping.
- Automatic computer backup facilities for electronic records.

- What health and safety records does the organisation keep?
- Where are the health and safety records (eg audiometric testing) kept?

4.5 Health and safety management system audits

4.5.1
There is a health and safety management system audit program to verify the effectiveness of the organisation's health and safety management system. The audit program takes into consideration health and safety risks and the results of previous audits.

Periodic audits of the health and safety management system are necessary to determine whether the system has been properly implemented and maintained and whether the organisation has met the performance objectives set within its health and safety policy.

The health and safety management system audit program should cover:

- audit scope
- audit frequency
- audit methodologies
- auditor selection, independence, competencies and responsibilities
- input from a representative sample of workers
- the reporting of results.

For consistency and reliability, audit procedures need to state what audit standard is to be used, where, when and how audits will be conducted and who will undertake them – eg a review of the entire health and safety management system may be conducted every two years and in the ensuing period, surveillance audits of higher risk areas may be conducted to verify that the systems in those areas continue to be implemented and are effective. It may be that the organisation designs a particular format or checklist for auditors to follow.

Persons selected as health and safety management system auditors should have the relevant technical knowledge as well as training and understanding of auditing techniques. This includes technical competence in health and safety. A proficient auditor must be able to organise the work and adequately document all findings, as well as have good interpersonal skills.

Auditors should be able to carry out their work freely and objectively, a requirement that is difficult to achieve if they have been directly involved in the areas or systems under review. Therefore auditors may be selected from different departments or locations, or the organisation may choose to use external auditors. There are advantages and disadvantages with using external providers. The quality of the independence, objectivity and fresh viewpoint gained from using an external auditor needs to be weighed against the opportunity to enhance internal skills and the use of the in-house knowledge.

The audit procedures should require that the auditors confirm aspects of the system by observation and discussion with the people who work within the system. To provide confidence, those discussions should involve a reasonable number of the relevant workers, including the worker health and safety representatives for the area. However, it is important to include safeguards that will allow for workers to speak freely. The audit process must test the performance of the system, not target individuals.

The auditing procedures also need to state who carries the responsibility for the various stages of the audit activity and the standard of reporting required.

- Documented health and safety management system audit procedures that include the requirements for worker verification and workplace observations.
- An auditor selection process.
- Records of auditor training and/or competence.
- Audit records that demonstrate that decisions were based on a combination of written, physical and verbal evidence.
- Audit reports which demonstrate that appropriate auditors have been selected.

?

- What is the health and safety audit standard used by the organisation and what audit procedures have been developed?
- Why was this standard chosen?
- How did the organisation select the auditors to undertake the audit program?
- What training has the organisation provided to internal auditors?
- Can workers confirm that they were able to provide input to the audits?

4.5.2

The organisation ensures that scheduled audits are performed to verify that:

a. workplace activities comply with health and safety procedures

b. procedures are properly implemented and maintained

c. procedures are effectively implemented across the organisation.

> An organisation should have an internal mechanism to verify that all aspects of the health and safety management system are effectively operating as planned. This verification could be achieved by conducting a complete system audit or audits of parts of the system at more frequent intervals.
>
> Audits should focus more regularly on those areas which carry the greatest risk exposure, the highest level of administrative controls, where problems have been identified in the past and how worker behaviour matches their expected safety performance, and whether the standard operating procedures need to be reviewed. The audit schedule should also take into account the complexity of the systems and the organisational structure.

- The audits should provide assessment and evaluation of health and safety management systems, importance of activities audited and health and safety performance outcomes.
- Management should ensure that there is a comprehensive system of planned and documented health and safety management system audits to verify the established health and safety management system:
  - effectively meets organisational health and safety policy as well as objectives and targets for injury/illness prevention and continuous improvement
  - conforms to any legislative and/or industry codes of practice or standards
  - is being implemented in accordance with the requirements of the system procedures
  - has been properly implemented and maintained.

- Audit schedules.
- Audit reports, audit tools, supporting criteria documents and worksheets.
- Audit schedules based on risk level and results of previous audits.
- Follow up audits for problem areas.

- How often does the organisation conduct audits of the health and safety management system?
- How does the organisation's audit program take into account health and safety risks?
- How often does the organisation audit higher risk areas?

4.5.3

Deficiencies highlighted by the audits are prioritised and progress monitored to ensure corrective action is implemented.

> A follow-up or surveillance audit should be used to monitor the implementation of corrective actions resulting from the findings of an audit.

- Audit results should be documented and communicated to workers, including workers in the area where the audit was undertaken.

- Records or minutes which include a priority list for corrective actions.
- Surveillance audits which verify implementation of corrective actions.
- Records of corrective actions taken.

- Can the organisation explain how health and safety deficiencies are prioritised and the implementation of corrective actions monitored?

Element 5: Management review

5.1.1

The organisation has a health and safety management system review program to ensure the continuing suitability and effectiveness of the system. The review program is undertaken with senior management and officer involvement and takes into account:

a. health and safety management system audit results

b. objectives, targets and performance indicators

c. changing circumstances

d. opportunities for continuous improvements.

Senior management have a responsibility to ensure that the systems in place within an organisation continue to meet the needs of that organisation. This can only be successful if the management system is reviewed on an ongoing basis like other aspects of the business. The review program must be documented and detail how the program will be applied. While senior management may not conduct the review themselves, they should closely manage the process and be accountable for the results.

The review program must also ensure that duty holders can demonstrate that they have discharged their legislative obligations effectively.

The review should use what is known about the current health and safety performance of the organisation to set future direction. Senior management are also in a position to foresee or plan any other issues which may impact on the health and safety management system – eg changing suppliers, opening new outlets, setting up new production lines or decommissioning older areas. Any upcoming legal and industry requirements also need consideration.

The organisation's health and safety policy and objectives provide the framework for the system. It is the senior management's prerogative and responsibility to alter that policy and the associated objectives where necessary, to better match the health and safety needs of the organisation.

- The capacity of the health and safety management system to achieve health and safety targets and objectives should be assessed. The processes for addressing system gaps should be documented and implemented.

- Senior management should be responsible for interpreting the results of statistical analysis associated with the reviews and ensuring initiatives to promote performance improvement and prevention of adverse trends are established and implemented.

- Comprehensive health and safety management system review program.

- Schedule of reviews.

- Records of reviews.

- Business continuity plan/contingency plan.

- How does the organisation ensure that senior management oversees the review process?

- When is the health and safety management system scheduled for review?

- How does the organisation determine the frequency for review of the health and safety management system?

5.1.2

Recommendations arising from health and safety management system reviews generate actions to improve performance and those actions are implemented.

> Areas identified as deficient need to be actioned. The process of management system review must ensure that the principles of continuous improvement are applied and that the system is effective in reducing workplace injuries.

- Records should be used to review and evaluate the effectiveness of the health and safety management system to prevent injury and illness in the workplace.
- The outcomes of the review process should be used to modify and amend system's criteria – eg policy, objectives, responsibilities, planning arrangements procedures and instruments (tools and forms) to ensure relevance, currency and continuous improvement.
- Review outcomes should be used to implement performance improvement strategies and ensure continuous improvement.

- Reports of health and safety management system reviews which include recommendations for action.
- Minutes of health and safety management system review meetings which record the discussion of health and safety issues raised by audit results, business, industry or supplier/customer requirements, legal issues and the overall health and safety performance of the organisation.
- Health and safety plans which schedule activities/actions arising from recommendations
- Evidence of changes made as a result of management reviews – eg organisation restructure, changes to assignment of responsibilities, changes to policy or reallocation of resources.

- What factors were considered in the last review of the health and safety management system?
- What actions have been planned or implemented, by the organisation, as a result of the last management review of the health and safety management system?

Appendix – Definition of terms used in this document

Audit
A systematic and independent examination against defined criteria to determine whether health and safety activities and related results comply with planned arrangements, whether these arrangements are implemented effectively and whether they are suitable to achieve the organisation's policy and objectives.

Audit report
A written record of the audit, which accurately and concisely documents the objective evidence and clearly communicates the findings of the auditor(s) for each of the criteria included in the audit.

Audit team
The auditors whose collective competence is appropriate to the activities to be audited and the related health and safety issues. The team is to be selected in accordance with the relevant regulator's procedures.

Competent person
A person who has acquired, through training, qualifications or experience (or a combination of these) the knowledge and skills enabling that person to perform the task required. The relevant knowledge and skills must be defined and documented.

Conformance
A judgment made by an auditor that the activities undertaken and the results achieved fulfil the specified requirements of the audit criteria. While further improvements may still be possible, the minimum requirements are being met.

Consultation
The sharing of information and the exchange of views between duty holders and the persons that must be consulted and the genuine opportunity for them to contribute effectively to any decision-making process that impacts on health and safety.

Continuous improvement
The process of enhancing health and safety to achieve improvements in overall health and safety performances, in line with the organisation's health and safety policy.

Dispute
A difference of opinion between two or more parties on a health and safety issue and which remains unresolved.

Facilities
Refers to things like washrooms, showers, lockers, dining areas and drinking water. There may be specific legislative requirements and details in building regulations and codes.

Hazard
A source or a situation with a potential for harm in terms of injury or illness, damage to property, damage to the environment or a combination of these.

Hazard identification
The process of recognising that a hazard exists and defining its characteristics.

Hazardous chemical
A substance, mixture or article that satisfies the criteria for a hazard class in the GHS* but does not include a substance, mixture or article that satisfies the criteria solely for one of the following hazard classes:

- acute toxicity – oral – category 5
- acute toxicity – dermal – category 5
- acute toxicity – inhalation – category 5
- skin corrosion/irritation – category 3
- serious eye damage/eye irritation – category 2b
- aspiration hazard – category 2
- acute hazard to the aquatic environment – category 1, 2 or 3

- chronic hazard to the aquatic environment – category 1, 2, 3 or 4
- hazardous to the ozone layer.

Note: The schedule 6 tables replace some tables in the GHS.

*The Globally Harmonised System of Classification and Labelling of Chemicals, Third revised edition, published by the United Nations as modified under schedule 6.

Health and safety objectives	Overall health and safety goal in terms of health and safety performance, arising from the health and safety policy that an organisation sets itself to achieve, and which are quantified where practicable.
Health and safety policy	Statement by the organisation of its intentions and principles in relation to its overall health and safety performance which provides a framework for action and for the setting of its health and safety objectives and targets.
Health and safety target	A detailed performance requirement, quantified wherever practicable and pertaining to the organisation, that arises from the health and safety objectives, and that needs to be met in order to achieve those objectives.
Hierarchy of controls	A series of control methods that can be used for the minimisation of risks to health and safety if elimination, so far as reasonably practicable, cannot be achieved. Typically:

- substitution
- isolation
- engineering controls
- administrative controls
- personal protective equipment.

Note: A combination of these measures may be applied if a single control is not sufficient. The hierarchy may vary in some jurisdictions.

Incident	An unplanned event resulting in, or having the potential for injury, ill health, damage or other loss.
Interested parties	Individual(s) or group(s) concerned with, or affected by the health and safety performance of an organisation, may, depending on circumstances, include health and safety representatives, health and safety committees, contractors, suppliers, other duty holders, regulatory authorities, community groups, non-government organisations, special interest groups and others.
Nonconformance	A judgment made by an auditor that the activities undertaken and the results achieved do not fulfil the specified requirements of the audit criterion. This may be caused by the absence or inadequate implementation of a system or part of a system, documented systems or procedures not being followed or a minor or isolated lapse in a system or procedure.
Not able to be verified	A situation where a relevant system procedure has been developed, but because of the infrequent need to use the system procedure there are no recent records or other form of verification available.
Not applicable	A judgement made by an auditor that the requirements of a particular audit criterion do not need to be met, because of the nature of the client organisation's operations.

Objective evidence	Qualitative or quantitative information that can verify the existence and effective operation of an aspect of an OHSMS. The information may be in the form of documents, electronic information, documented records, visual observations and discussion with workers and others. The audit records should provide enough information to allow evidence to be identified, located and independently verified by another auditor. Evidence of a system being in operation for at least three months is required to verify conformance to an audit criterion.
Observation	A system deficiency of a minor nature that, in the auditor's opinion, does not warrant the issue of a nonconformance report.
Officer	A broad term that applies to people who can make decisions that significantly affect a business or undertaking.

An officer may be, depending on the jurisdiction:

- an officer within the meaning of section 9 of the *Corporations Act 2001*, namely:
  - a director or secretary of a corporation
  - any person who can make, or participate in making, decisions that affect the whole, or a substantial part, of the business of the corporation
  - a person who has the capacity to significantly affect the corporation's financial standing
  - a receiver, or receiver and manager, of the property of the corporation
  - an administrator of a corporation
  - an administrator of a deed of company arrangement executed by a corporation
  - a liquidator of a corporation
  - a trustee or other person administering a compromise or arrangement made between the corporation and someone else.
- an officer of the Commonwealth within the meaning of section 247 of the *Work Health and Safety Act 2011 (*WHS Act)
- an officer of a public authority within the meaning of section 252 of the WHS Act.

Note: Under the WHS Act, the definition of an officer excludes:

- a partner in a partnership
- a Minister of the Crown
- an elected member of a local authority. |
OHS management system	That part of the overall management system which includes organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the health and safety policy, and so managing the health and safety risks associated with the business of the organisation.
Organisation	Company, corporation, firm, enterprise or institution, or other legal entity or part thereof, whether incorporated or not, public or private, that has its own function(s) and administration.
Performance indicator	A selected indicator of how effectively a process is operating against objectives. These indicators can be quantitative or qualitative and the choice is dependent on the type of element they are used to measure, as appropriate to the organisation.

Personnel	A body of persons employed in an organisation or place of work.
Procedure	A document in text or graphic format that describes the reason, scope, steps to be followed and responsibilities for a component of the health and safety management system. It may also include definitions and references to other documents. It must be implemented effectively.
Process	A set of inter-related resources and activities that transform inputs into outputs.
Program	A planned component of an organisation's business management system for health and safety. A program can also be a collection of procedures that have a common purpose.
Record	Document that furnishes objective evidence of activities performed or results achieved.
Relevant	Connected with the matter in hand – eg legislative requirements and/or other identified needs of the organisation.
Resources	Resources include financial (eg money and time), physical (eg equipment, reference library) and human resources (eg health and safety coordinator, health and safety representative, health and safety consultant).
Risk	The combination of the frequency, or probability of occurrence, and consequence of a specified hazardous event.
Risk assessment	The overall process of estimating the magnitude of risk and deciding whether the risk is tolerable.
Senior management	May consist of an individual, or a group of individuals, with executive responsibility for the organisation.
System	A coordinated and interacting group of policies, procedures and processes created to carry out a specific activity, perform a duty or address an issue.
Verification	Confirmation by examination and provision of objective evidence that the specified requirements of the audit criteria have been met.
Worker	A broad term that includes:

- an employee
- a contractor or sub-contractor
- an employee of a sub-contractor
- an employee of a labour-hire company who has been assigned to work in the organisation
- an outworker
- an apprentice or trainee
- a student gaining work experience
- a volunteer
- a person of a prescribed class.