



# Occupational Health and Safety Manual



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The policies contained in this manual apply to all employees, while they are present in any building, facility or grounds owned, occupied or managed by WA Sweeping and Scrubbing irrespective of their employment relationship with WA Sweeping and Scrubbing, inclusive of employees, contractors and employees of contractors.

These policies and procedures have been designed to work in conjunction with the Recording Centre Kit and Emergency Plan.

The content of this Occupational Health and Safety Management System (OHSMS) has been aligned with key elements from:

- AS/NZS 4801
- OHSAS 18001
- Occupational Health and Safety Act 2004
- Occupational Health and Safety Regulations 2007
- Relevant Compliance Codes and Codes of Practice

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## Purpose, Scope and Review

### Purpose:

The purpose of the OHS Manual is to outline the WA Sweeping and Scrubbing procedures for Occupational Health and Safety (OHS) in accordance with the requirements of the Occupational Health and Safety Act 2004 and Occupational Health and Safety Regulations 2007.

The Manual describes procedures covering processes for:

- Risk Management
- Employee Induction & Training
- Communication and Consultation
- Contractor Management
- Incident Management and Reporting
- Emergency Management
- Record Keeping, Auditing & Review

### Scope:

The Manual details important information for employees to enable them to follow procedures to ensure health and safety as far as is reasonably practicable. The Manual includes roles and responsibilities of key personnel (including managers/supervisors and Health and Safety Representatives), step-by-step guidelines and instructions and provisions for the regular review of procedures.

The procedures contained in this Manual apply to all employees, while they are present in any building, facility or grounds owned, occupied or managed by WA Sweeping and Scrubbing irrespective of their employment relationship with WA Sweeping and Scrubbing, inclusive of employees, contractors and employees of contractors. Visitors to WA Sweeping and Scrubbing sites are requested to cooperate and follow reasonable directions in respect of these procedures as given to them by WA Sweeping and Scrubbing employees.

### Review:

All procedures will be reviewed if:

- It is identified that there are changes in the workplace that affect the procedure
- It is identified that the procedure is not effective
- There are legislative changes that affect the procedure

All procedures will be reviewed at least annually.

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# Section 1 Consultation

## 1.1 Consultation Policy

OHS legislation requires an employer to consult with their employees and other relevant persons on matters that will or are likely to directly affect their health and safety. WA Sweeping and Scrubbing recognises the benefits that regular and effective communication and consultation can produce and is committed to fulfilling this duty.

### Objective

Ensure formal consultation methods are established so employees and other duty holders, such as contractors (and employees of contractors) are aware of health and safety matters relevant to them.

### Policy

WA Sweeping and Scrubbing will establish the following AGREED consultative arrangements in line with State legislative requirements:

- Health and Safety Committees and regular meetings
- Work Groups
- Elected Health and Safety Representatives
- Regular toolbox/safety meetings with OHS as a standing agenda item

Further to this, consultation will take place in the following ways:

- Formal Inductions
- Training
- Information on hazards and the existing OHS Management System
- Emergency Response
- OHS meeting minutes displayed
- Incident investigation and corrective actions
- Results of OHS evaluations including audits, non-conformances
- Review of OHS objectives
- Safe Work Procedures, Safe Work Method Statements
- Risk Assessments, Risk controls and feedback regarding long-term controls
- Material Safety Data Sheets (MSDS), product safety sheets, operating manuals etc.
- Reporting and keeping records in line with legislative requirements

WA Sweeping and Scrubbing will make every effort to ensure that the above information will be modified for languages other than English and persons with learning disabilities as relevant.

Consultation will be timely and allow for relevant persons to contribute their views and feedback. Feedback will be considered during hazard identification, risk assessment and implementation of risk controls.

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## 1.1.1 Consultation Procedure

### Responsibilities:

All employees, and others, are responsible for actively participating in consultation and for following reasonable directions in respect of OHS consultation procedures whilst working at WA Sweeping and Scrubbing.

Managers / Supervisors are responsible for:

- Informing employees & others about the requirement to actively participate in, and follow, the Consultation Procedure and associated mechanisms whilst working at WA Sweeping and Scrubbing.
- Ensuring that all people are adequately trained in how to consult in the workplace.
- Conducting, and enabling, regular consultation with all employees and work groups.
- Maintaining records required by legislation relating to consultation.

The HSR / OHS Manager / Co-ordinator is responsible for:

- Maintaining and reviewing the Consultation Procedure as required
- Ensuring all employees have access to adequate consultation mechanisms and that they actively participate in consultation in the workplace
- Informing and consulting with the business owner/CEO regarding consultation as necessary
- Maintaining formal, approved consultation mechanisms and records required by legislation

WA Sweeping and Scrubbing the employer is responsible for ensuring that:

- There is an effective Consultation Procedure and associated mechanisms in place that meet legislative requirements.
- All employees are trained and familiar with, have access to and participate in the Consultation Procedure and associated mechanisms while working at WA Sweeping and Scrubbing.
- Those other persons, who are impacted by OHS at WA Sweeping and Scrubbing, such as other employers, self-employed persons and visitors, are included in consultation as required.
- Review of the Consultation Procedure is conducted as required.

### Procedure:

WA Sweeping and Scrubbing has established the following AGREED consultative arrangements in line with State legislative requirements:

- Health and Safety Committee and regular meetings
- Work Groups
- Elected Health and Safety Representatives (HSRs)
- Regular toolbox/safety meetings with OHS as a standing agenda item. WA Sweeping and Scrubbing records the Minutes on the Toolbox Meeting Minutes Form.

Consultation mechanisms at WA Sweeping and Scrubbing include the following:

- Formal Induction Training following the Site Induction Procedure
- Training as outlined in the Training and Competency Procedure
- Information on hazards and the existing OHS Management System
- Emergency Response as outlined in the Emergency Plan
- OHS meeting minutes displayed
- Incident investigation and corrective actions as detailed in the Incident Reporting procedure
- Results of OHS evaluations including audits, non-conformances
- Review of OHS objectives
- Safe Work Procedures, Safe Work Method Statements
- Risk Assessments, risk controls and feedback regarding long-term controls
- Material Safety Data Sheets, product safety sheets, operating manuals etc.
- Reporting and keeping records in line with legislative requirements

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In the first instance, employees who identify OHS issues in the workplace, or who wish to communicate with WA Sweeping and Scrubbing in regard to OHS, should contact their supervisor or manager.

If it is not possible, or the employee feels uncomfortable to raise a particular OHS issue with their supervisor or manager, they should contact their work group's Health & Safety Representative (HSR) for assistance and/or consultation.

Employees who are HSR's are deemed to represent employees in particular work groups and as such, will undertake regular meaningful consultation with the employees in their work group. They will also respond to OHS issues raised with them by an employee or group of employees, in accordance with their duties as a HSR.

HSR's are then empowered to raise OHS issues formally at meetings with the supervisor or manager and may in certain circumstances contact the relevant State Authority for assistance and/or information.

The OHS Manager will co-ordinate, manage, resolve and document any formally raised OHS issues, in consultation with the relevant employees and HSR's involved with the issue. They will then report to the business owner/CEO to ensure they are fully consulted with regarding the nature and outcome of the OHS issue.

The business owner/CEO will be actively included and engaged with the consultation procedure in regard to OHS issues identified and raised at WA Sweeping and Scrubbing by the OHS Manager or HSR.

## 1.2 Remote or Isolated Work Policy

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WA Sweeping and Scrubbing has an obligation to manage risks to health and safety for their employees, including remote or isolated employees. Remote or isolated employees include those employees who may not have the adequate assistance from rescue or emergency service employees or medical treatments whilst performing duties for WA Sweeping and Scrubbing.

**Aim**

WA Sweeping and Scrubbing is committed to the development of a system to ensure an effective risk management for employees who may be at increased risk with working remotely or in isolation.

**Policy**

WA Sweeping and Scrubbing will develop a system to:

- Identify persons/tasks working remotely or in isolation.
- Assess the risk to persons working remotely or in isolation. Consideration will be given to the following:
  - Duration of task
  - Time
  - Existing communication systems
  - Location
  - Proximity to medical treatment facilities and emergency responders
  - Nature of work
  - Skills and Experience of employees
- Suitable controls will be selected for remote/isolated employees:
  - Reducing time spent working remotely/in isolation wherever possible
  - Develop list of tasks that are considered too risky for working in isolation
  - Provision of effective and functional communication equipment
  - Provision of distress alarms/beacons or other equipment as necessary
  - Mobile phones
  - GPS locators
  - Reporting /checking-in procedures
  - Other equipment specific to the tasks as required.
- All controls will be reviewed whenever:
  - Control is no longer effective
  - Before any change likely to introduce new or different hazards that current controls will not adequately address
  - A new hazard or risk is identified
  - Results of consultation indicate a review is needed
  - Requested by employees or Health and Safety Representative.

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## Section 2 Emergency Management

### 2.1 Emergency Management Policy

#### Aim

WA Sweeping and Scrubbing has an obligation to provide and maintain a safe environment for all people at the workplace, whether they are employees or not. WA Sweeping and Scrubbing is committed to the development of an Emergency Management Plan (EMP) to ensure an effective response to an emergency.

#### Policy

WA Sweeping and Scrubbing will determine likely emergency situations and develop and implement an EMP for action in the event of an incident or situation that could pose a threat to life, health or property. Including:

- Fire and/or explosion
- Dangerous chemical release
- Medical Emergency
- Bomb Threats
- Violence or Robbery
- Other relevant matters based on the nature of the work, hazards, size and location and number and composition of persons at the workplace

The EMP will ensure the health and safety of persons by including the following:

- Written instructions to ensure emergency service organisations are contacted at the earliest opportunity
- Written instructions for specific emergencies
- Site Plan displayed and accessible to all persons on site
- Evacuation procedures and assembly points clearly marked
- Alert /Warning Alarms/Systems
- Emergency Exits well lit and clear of obstructions
- Fire Protection that is accessible and in working order
- MSDS for all chemicals accessible and current
- Trained First Aid personnel and First Aid equipment
- Roles/Responsibilities, such Area Wardens
- Specialised training
- Specific procedures for mobility impaired persons
- Contact details for Emergency Services
- Reliable and functional communication equipment
- Instructions for notifying relevant Authorities
- Involvement with Emergency Response Organisations and neighbours as relevant

The EMP will be reviewed and tested to ensure its effectiveness.

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## 2.1.1 Emergency Management Procedure

### Responsibilities:

All persons employed or engaged by WA Sweeping and Scrubbing are responsible to ensure that they are familiar with the content of the Emergency Management Plan (EMP); that they are competent in carrying out the emergency response procedures contained within the EMP; and that they participate in consultation and emergency response drills when required to maintain emergency preparedness at all times.

### Procedure:

The Emergency Management plan includes details of the following that will be enacted during emergency & evacuation events:

- Facility (site and buildings) description and Site Plan
- Evacuation Plan
- Emergency contact numbers
- List of persons responsible for Emergency Response
- Evacuation communication procedures
- General emergency response procedure
- Emergency fire evacuation procedure
- Fire fighting use, equipment and procedures
- First Aid access/equipment details and First Aid staff register
- Medical emergency procedure
- Hazardous Substances/materials emergency procedure
- Bomb threat procedure
- Emergency response drill records

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## 2.2 First Aid Policy

First aid is the provision of initial care for an illness or injury and generally consists of a series of simple and in some cases, potentially life-saving techniques that can be done with minimal equipment. WA Sweeping and Scrubbing has a moral and legal obligation to provide first aid services to employees, visitors and others.

### Aim

To minimise the negative effects of an incident/injury by providing first aid resources and trained First Aid Officers (FAO's).

### Policy

WA Sweeping and Scrubbing will use the guidelines as outlined in the WorkSafe Compliance Code for First Aid to ensure the provision of a prompt, coordinated First Aid response in the following ways:

- Meet and/or exceed legislative requirements
- Identify and assess the potential for an injury/incident occurring by:
  - Observing tasks/work performed/work environment
  - Consulting with employees/Health and Safety Representatives/Officers
  - Reviewing near misses and past injury reports
  - Reviewing MSDS for hazardous substances
  - Other means as necessary
- Determine suitable resources based on the nature of the work, hazards, size and location and number and composition of persons at the workplace
- Specify minimum requirements based on risk. For example:
  - Type, contents and number of kits
  - Number and location of FAO (including remote locations)
  - Provision of First Aid rooms and specialist kits
- Advertise location of First Aid Kits, Rooms
- Advertise location and contact details for FAO's
- Regularly audit contents of kits and contact details
- Document all treatment, injuries and illness
- Appointing, training and replacing FAO as required
- Ensure FAO's:
  - Receive adequate training from Registered Training Organisation
  - Able to perform First Aid duties
  - Willing to provide First Aid treatment as required

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## Section 3 Hazardous Substances

### 3.1 Hazardous substances Policy

#### Aim

WA Sweeping and Scrubbing is committed to providing a safe environment for employees (including contractors and employees of contractors) visitors, members of the public and the environment in relation to hazardous substances.

#### Objective

WA Sweeping and Scrubbing will ensure that hazards associated with the use, handling, generating, storage and disposal of hazardous substances are identified, assessed and controlled as far as reasonable.

#### Policy

WA Sweeping and Scrubbing will ensure a systematic approach to managing health and safety risks associated with hazardous substances. Consideration will be given to the properties of the chemicals, physical reactions and health effects, nature of work and other plant or structures that may cause adverse reactions with the hazardous substances.

WA Sweeping and Scrubbing will implement a system to manage all hazardous substances to include:

- Register of hazardous substances
- Legislative requirements for quantities:
  - Manifest
  - Placarding
- Consultative approach to risk assessments
- Suitable storage facilities
- Substitution with less hazardous substances where possible
- Access to Information:
  - Correct Labelling
  - MSDS (accessible and current – within 5 year issue date)
  - Safe Work Instructions
  - Results of risk assessments
  - Training and Supervision
- Responsible persons
- Health monitoring
- Suitable Personal Protective Equipment
- Regular audits of system

WA Sweeping and Scrubbing will ensure risk controls are reviewed if there are changes to MSDS, health monitoring results indicate exposure, atmospheric monitoring reveals concentrations have exceeded the exposure standard for the chemicals.

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## Section 4 Hazardous Work

### 4.1 Hazardous Manual Tasks Policy

WA Sweeping and Scrubbing is committed to preventing injuries caused by manual tasks through the identification of hazardous manual tasks and implementation of suitable risk controls.

#### Objective

WA Sweeping and Scrubbing will endeavour to eliminate or reduce the number and severity of injuries caused by hazardous manual tasks by implementing procedures to manage hazards and the associated risks arising from hazardous manual tasks.

#### Policy

WA Sweeping and Scrubbing will take a consultative approach to manage risk associated with hazardous manual tasks. Steps include:

Identifying hazardous manual handling tasks:

- Discomfort surveys
- Observing tasks
- Breaking tasks down where required
- Seeking employee input
- Hazardous tasks can include use of force (high or sudden, repetitive, or sustained), repetitive movement and sustained or awkward postures
- If risk is well known and controls are generally accepted and available, a risk assessment will not be undertaken
- If a risk assessment is required, it will be documented and take the following risk factors into account:
  - Duration and frequency
  - Forces exerted
  - Sources of risk (such as layout of workplace, loads, tools, systems of work, environment)
- Implement controls using a hierarchy of controls. Example:
  - Eliminate task
  - Substitute for less hazardous options
  - Isolate persons from risk
  - Use engineering controls
  - Develop procedures and administrative controls
  - Provide Information, training and instruction
- Review risk controls whenever:
  - Control is no longer effective
  - Before any change likely to introduce new or different hazards that current controls will not adequately address
  - A new hazard or risk is identified
  - Results of consultation indicate a review is needed

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## 4.2 Health Surveillance Policy

WA Sweeping and Scrubbing acknowledges that it has specific obligations under OHS legislation to undertake Health Surveillance if employees may be exposed to hazardous substances and processes which have the potential to result in disease or adverse health effects upon exposure. Occupational health hazards requiring Health Surveillance may include, but are not limited to: noise, hazardous substances, dangerous goods, fumes, dusts, gases and pathogens.

### Aim

To reduce the risk to employees from adverse exposure to physical hazards and hazardous substances, by providing a framework to conduct and monitor Health Surveillance in the workplace.

### Policy

WA Sweeping and Scrubbing will ensure that Health Surveillance is carried out if:

- A employee is carrying out on-going work using, handling or storing hazardous substances and there is a significant risk to the employee's health because of exposure to a designated hazardous substance, as described in the OHS Regulation 2007
- If valid techniques are available to detect the effect on the employee's health or a valid way of determining biological exposure to the hazardous substances is available and it is uncertain, on reasonable grounds whether the exposure to the hazardous substances has resulted in the biological exposure standard being exceeded
- If it identified that employees may be exposed to noise levels in excess of the relevant Exposure Standard.

The following tasks will form the framework to identify the need to conduct Health Surveillance and the process involved with the conduct and monitoring of Health Surveillance:

- Identification of situations where a employee may have on-going exposure to hazardous substances and/or hazardous processes that may have a negative impact on their health
- Assessment of the extent of the risk associated with the work
- Establishment of control measures using the hierarchy of controls
- Establishment of a process for monitoring the health of employees, as per the relevant OHS Legislation and Australian Standard
- Regular consultation with employees who are required to participate in Health Surveillance, or who work in situations where their health may be negatively affected by on-going work with hazardous substances and/or processes
- Documented systems to monitor and evaluate the effectiveness of the risk control measures.

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## 4.2.1 Health Surveillance Procedure

### Responsibilities:

**Employees** are responsible to:

- Cooperate with reasonable directions in respect of Health Surveillance and monitoring processes
- Wear appropriate personal protective protection when it is required as per the relevant Safe Work Method Statements and site procedures
- Be familiar with, understand and follow this procedure.

At WA Sweeping and Scrubbing the HSR / OHS Manager is responsible to:

- Determine if and when Health Surveillance and monitoring is required
- Consult with employees during all phases of Health Surveillance
- Maintain accurate records including the Health Surveillance Record
- Familiarity and understanding of this and any other procedures associated with Health Surveillance and monitoring
- Liaison and coordinate with registered medical practitioners engaged by WA Sweeping and Scrubbing to perform Health Monitoring services
- Provide information and training to employees as required.

**The employer** is responsible to ensure there is a safe, effective system in place for employees who may be exposed to and processes, which have the potential to result in disease or adverse health effects upon exposure while undertaking tasks for WA Sweeping and Scrubbing, in accordance with the requirements of OHS legislation.

### Procedure:

WA Sweeping and Scrubbing will:

- Inform employees and prospective employees about Health Surveillance requirements
- Ensure Health Monitoring is carried out by or under the supervision of a registered medical practitioner with experience in Health Monitoring
- Consult employees regarding the selection of the registered medical practitioner as required
- Pay all expenses relating to health monitoring of WA Sweeping and Scrubbing employees
- Provide certain information about a employee to the registered medical practitioner
- Take all reasonable steps to obtain a report from the registered medical practitioner as soon as practicable after the Health Monitoring has been carried out
- Provide a copy of the report to the employee and State Authority, accompanied by a written explanation of the meaning and implications, if the report contains adverse test result or recommendations that remedial measures should be taken
- Provide the report to all other employer's who have a duty to provide Health Monitoring for the employee
- Retain reports as confidential records for at least 30 years after the record is made.
- Complete and maintain the Health Surveillance Record
- Not disclose the report to anyone without the employee's written consent unless required under the OHS Regulations.

The personal information of individual employees, including medical reports and Health Surveillance will remain confidential at all times between the relevant senior manager and the individual employee.

For employee exposure to noise, refer to the Hearing Protection and Audiometric Testing Procedure.

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## 4.3 Hearing Protection and Audiometric Testing Policy

WA Sweeping and Scrubbing acknowledges that it has specific obligations under OHS legislation to manage the risks of hearing loss associated with exposure to noise at the workplace.

### Aim:

To assist WA Sweeping and Scrubbing to comply with relevant OHS legislation in respect to Hearing Protection and Audiometric Testing by having systems in place to:

- Ensure the noise an employee is exposed to at the workplace does not exceed the Exposure Standard for noise.
- Provide audiometric testing to a employee who is frequently required to use personal hearing protectors to protect the employee from hearing loss associated with noise that exceeds the exposure standard.

### Policy

The following tasks will form the framework to identify and mitigate risks in respect of noise and hearing loss:

- Identification of situations where a employee may be exposed to noise exceeding the Exposure Standard
- Assessment of the extent of the risk associated with the work in respect of hearing loss
- Establishment of noise monitoring systems and interpretation of noise monitoring results
- Establishment of control measures using the hierarchy of controls
- Regular consultation with employees who are exposed to noise at the workplace
- Documented systems to monitor and evaluate the effectiveness of the risk control measures.

Noise Assessments and Audiometric Testing will be done by a suitably qualified person, and will be carried out in accordance with the legislative requirements and the procedures outlined in the relevant Australian Standard.

The personal information of individual employees, including medical reports and Audiometric Testing results will remain confidential at all times between the relevant senior manager and the individual employee. Employees will be given the results of Audiometric Testing accompanied by a written explanation of the meaning and implications.

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### 4.3.1 Hearing Protection & Audiometric Testing Procedure

This procedure applies to all WA Sweeping and Scrubbing worksites, where employees are required to work in areas where they may be exposed to noise that exceed the Exposure Standard.

**Responsibilities:**

**Employees** are responsible to:

- Cooperate with reasonable directions in respect of Noise and hearing loss prevention
- Wear appropriate hearing protection when it is required as per the relevant Safe Work Method Statements and site procedures
- Be familiar with, understand and follow this procedure.

At WA Sweeping and Scrubbing, the HSR / OHS Manager is responsible to:

- Determine if and when Noise Assessment (including Noise Monitoring) and Audiometric Testing is required
- Consult with employees during all phases of Noise Assessment and Audiometric Testing
- Maintain accurate records including the Audiometric Testing Record and Noise Monitoring Record
- Familiarity and understanding of this and any other procedures associated with Noise Assessment and Audiometric Testing
- Liaison and coordinate with persons engaged by WA Sweeping and Scrubbing to perform Audiometric Testing
- Provide information and training to employees as required.

The employer and Self Employed persons are responsible to ensure there is a safe, effective system in place for employees who may be exposed to excess noise while undertaking tasks for WA Sweeping and Scrubbing, in accordance with the requirements of OHS legislation.

**Procedure:**

Examples of how WA Sweeping and Scrubbing may isolate the source of noise from employees include:

- Building enclosures or sound proof covers around noise sources
- Using barriers or screens to block the direct path of sound
- Locating noise sources further away from employees
- Using remote controls to operate noisy plant from a distance

Administrative controls used to reduce the amount/length of time of employees are exposed to noise may include:

- Organising schedules so that noisy work is done when a minimum number of employees are present
- Notifying employees and others in advance of noisy work so they can limit their exposure
- Keeping employees out of noisy areas if their work does not require them to be there
- Sign-posting noisy areas and restrict access
- Provision of quiet areas for rest breaks for employees
- Limiting the time employees are allowed to spend in noisy areas

If using Hearing protection (PPE) is required, managers and supervisors will ensure:

- It is worn by all persons throughout the period of exposure to noise
- It is suitable for the type of working environment and the work tasks
- It is comfortable and correctly fitting for the employee
- It is regularly inspected and maintained to ensure it remains in good, clean condition
- Disposable ear-plugs are only worn once
- Signs are used to indicate “Hearing PPE must be worn” areas.

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When choosing hearing protection the following will be considered:

- Overprotecting by cutting out too much sound can cause difficulties hearing verbal instructions and other sounds needed to work safely. This is especially important when working near Mobile Plant and vehicles
- Ear-plugs are difficult to use hygienically for work that requires them to be inserted with dirty hands
- Ear-muffs can be uncomfortable to wear in hot, humid environments
- Wearing PPE can make it difficult for the employee to enter a confined space or to wear a helmet.

Authorised suitably qualified persons will carry out noise Monitoring and Noise Assessments and the requirements of the relevant Australian Standards will be strictly followed.

### Audiometric Testing

If Audiometric testing is required it will:

- Be provided within three months of the employee commencing work
- Be started before people are exposed to hazardous noise (e.g. new employees or those changing jobs)
- Provide a baseline as a reference for future audiometric test results
- Have follow-up tests carried out at least every two years
- Be carried out in consultation with employees and their health and safety representatives
- Be carried out by suitably qualified persons in accordance with the relevant Australian Standard
- Be carried out in accordance with the requirements of OHS legislation.

Employees will be provided with their personal results of audiometric testing accompanied by a written explanation of the meaning and implications. Comprehensive records will be kept, including the Audiometric Testing Record and the Noise Monitoring Record.

Audiometric Testing results will be maintained for as long as they are applicable  
Confidentiality will be maintained in respect of individual employee's Audiometric testing.

### Review:

This procedure will be reviewed if:

- It is identified that there are changes in the workplace that affect the procedure
- Results from Noise Monitoring or formal Noise Assessments indicate that additional controls and/or procedures are required
- It is identified that the procedure is not effective
- There are legislative changes that affect the procedure
- Results from Audiometric Testing indicate that an employee has sustained hearing loss injury.

This procedure will be reviewed at least annually.

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## Section 5 Health & Welfare

### 5.1 Drug and Alcohol Policy

WA Sweeping and Scrubbing is committed to providing a work environment for its employees, clients and visitors that is safe and without risks to health and safety. The misuse or abuse of alcohol and other drugs represents a significant problem to both employers and employees in terms of workplace incidents/near misses, absenteeism and other individual costs.

#### Objective

A work environment in which the safety and performance of employees is not adversely affected by the use of alcohol or other drugs.

#### Policy

Employees must not perform work duties under the influence of alcohol or any other drug, except where the drug is legally prescribed by a registered medical practitioner for the purposes of treating a medical condition.

Work duties include:

- Presenting at the workplace or off-site job
- Operating plant or equipment
- Use of company vehicles

Where an employee is on prescribed medication that may impair their judgement or performance, they must notify their supervisor and work will be modified to accommodate impairment.

Possession of, use, distribution or sale of alcoholic beverages or illegal drugs on the premises of WA Sweeping and Scrubbing, is not allowed.

On occasion, WA Sweeping and Scrubbing will host social functions, where the Managing Director may permit limited alcohol consumption. At these functions, people must always remember they are representing WA Sweeping and Scrubbing and must conduct themselves in an appropriate manner.

Where an employee presents for duty and appears not to be in a fit state to carry out their normal duties WA Sweeping and Scrubbing reserves the right to remove the employee from the work site and seek advice from a medical practitioner on the employee's fitness for duty.

Supervisors and employees are obliged to ensure that no person commences or continues duty if that person appears affected by alcohol, illegal drugs or medication that may lead to a health and safety risk.

Confidentiality is to be strictly observed in these matters.

A breach of this policy will lead to disciplinary action and may result in the termination of employment.

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## 5.2 Fatigue Management Policy

WA Sweeping and Scrubbing is committed to protecting the health, safety and welfare of our employees. We believe that fatigue can cause the potential for fatalities or serious injuries to employees (including contractors and employees of contractors), visitors or members of the public and as such, are committed to the effective management of fatigue risks.

### Objective

To identify and reduce risks in relation to fatigue and to provide adequate resourcing to prevent fatalities, injury or illness caused by fatigue.

### Policy

WA Sweeping and Scrubbing will:

- Develop and implement a documented Fatigue Management Plan (FMP) in the following situations:
  - Overnight shifts
  - Potential for extended shifts
  - Employee shifts that could exceed 48 hours in a consecutive 5 day period (including unplanned, on-call or emergency work)
  - Employees do not have a minimum of 2 days in a row without working in any 7 day period
  - Where fatigue has been identified as a potential health and safety risk
- FMP will be developed in consultation with relevant persons and include the following:
  - Allocation of responsible persons
  - Allocation of resources (including financial and personnel) to implement FMP
  - Identification of risk factors for fatigue. Including:
    - Mental / physical demands of work
    - Work schedules and planning
    - Environmental factors
    - Commute times
    - Work/home life balance / constraints
    - Existing health conditions that may contribute to fatigue
  - Assessment of risk
  - Development and implementation of suitable controls
  - Training for all relevant persons in importance and use of controls
  - Review of exposure standards and PPE requirements for extended work times
  - Review and audit of controls
- Adequacy of the FMP will be reviewed every 6 months, or if an incident or near miss occurs in relation to fatigue. The FMP will then monitored and reviewed accordingly

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### 5.3 Rehabilitation and Return to Work Policy

WA Sweeping and Scrubbing believes that its employees are WA Sweeping and Scrubbing’s greatest assets. WA Sweeping and Scrubbing is committed to assisting injured employees to return to work as soon as medically appropriate and work with the medical community to help injured employees regain quality of life.

**Objective**

WA Sweeping and Scrubbing will develop a program to ensure injured employees return to work in a timely and safe manner.

**Policy**

WA Sweeping and Scrubbing will undertake the following in the case of a workplace injury:

- Ensure the injured employee’s right to confidentiality of medical information
- Ensure that no information will be used to discriminate against the injured employee
- Nominate a Return to Work (RTW) Coordinator who has
  - Authority and time to adequately consult, liaise and make decisions with the relevant parties, subject to this policy and procedure
  - Ability to communicate across cultures, including ethnicity, gender and age,
  - No function in the role of a claims manager
  - Has completed training as a RTW Coordinator (approved by State Authority)
- Establish a return to work group, which will comprise the RTW coordinator, the injured employee (where medically able), the Health and Safety Representative and the union delegates
- Ensure RTW plans are completed within the legal timeframes
- RTW plans will:
  - Commence as soon as possible after the likely time off work is known
  - Be based on the advice of the employee’s own treating health practitioner/doctor, and the occupational rehabilitation service provider
  - Be developed with regard to the health and safety of co-employees
  - Be developed in adherence to the risk management plan
  - Be in compliance with the relevant legislation and agreed consultation procedures
  - Be written using the Return to Work plan agreed format and provided to the employee and their health care provider
  - Be regularly evaluated, monitored and updated by the RTW Group

WA Sweeping and Scrubbing will ensure the employees early return to work where it is safe to do so. Options for a RTW plan shall be in accordance with the following preferred order:

- Original duties within work area/shift, with modification of workstation and equipment where required
- Modified duties, hours, and/or work area
- Alternative duties with appropriate training
- Retraining or further training and/or education

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Employees of WA Sweeping and Scrubbing must participate in RTW by:

- Obtaining appropriate medical treatment
- For work related injuries, obtain a Medical Certificate from their treating medical practitioner and provide appropriate employees compensation forms and documentation
- Contacting the employer as soon as possible after injury/illness
- Maintaining communication
- Assisting to identify suitable modified duties
- Accepting modified duties where agreed/reasonable
- Actively participating in return to work plans

WA Sweeping and Scrubbing will:

- Maintain a register of acceptable modified duties
- Make offers for modified duties in writing (on the applicable forms) and provide these to the injured employee and healthcare practitioner. Not terminate the employment of an injured employee by reason of their injury or reasons that include their injury
- Educate employees in relation to the causes of the injury and subsequent risk controls
- Keep records as required by State Authority
- Display an “If you are injured” (or similar) poster for employees
- Ensure all employees are aware of responsibilities and rights in relation to RTW through training and education
- Manage disputes through agreed procedures and legislative requirements

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## 5.4 Smoke Free Workplace Policy

Under Occupational Health and Safety legislation employers must ensure that the working environment is safe and without risks to health. Smoking and passive smoking pose serious health risks therefore WA Sweeping and Scrubbing is committed to providing a smoke-free work environment.

### Objective

To achieve a smoke-free workplace to protect all employees, contractors and visitors from the effects of environmental cigarette smoke.

### Policy

Smoking is prohibited on the premises including:

- Enclosed or partially enclosed areas
- Any area that is within 4 metres of where food is being prepared
- Any vehicles belonging to XYZ Company
- Near doorways, windows or vent ducts
- Within 4 metres of any entrance to a building

Persons who wish to smoke during work hours must only do so outside the workplace and in their scheduled breaks or other approved times.

It is recognised that while this initiative will provide a positive benefit to all employees, some employees may have difficulty in adjusting, particularly those whose smoking habit is a long-standing one. It should be noted that smokers are being asked to restrict their smoking in the workplace rather than stop smoking altogether. Every effort will be made to assist smokers to adapt to working conditions under this policy.

WA Sweeping and Scrubbing may promote quit programs, provide assistance with advice and information to quit smoking.

Adherence to this policy is a condition of employment. Employees who breach this policy will face disciplinary action and in some cases, prosecution under any relevant legislation.

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## 5.5 Stress Policy

WA Sweeping and Scrubbing is committed to protecting the health, safety and welfare of our employees. We recognise that workplace stress is a health and safety issue and acknowledge the importance of identifying and reducing workplace stressors.

### Objective

To identify and reduce risks in relation to stress and to manage the negative impact of stress.

### Policy

WA Sweeping and Scrubbing Company will:

- Identify sources of workplace stressors
- Determine risks by describing the circumstances and exposure to risk and the potential effects
- Control risks by implementing risk controls to eliminate or reduce risks in relation to stress
- Consult with industry stakeholders, State Authorities, Health and Safety Representatives and employees in relation to stress risk controls
- Promote recognised stress management techniques
- Provide awareness raising and training for appropriate management of employees
- Establish reporting, issue and conflict resolution guidelines
- Recognise and support employees who may be experiencing work related stress
- Ensure injured employees receive treatment and assistance they require to return to work
- Reviewing systems work and risk control measures regularly, and in the event of an injury report in relation to stress.

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## 5.6 Sun Safety Policy

Australia has the highest incidence of skin cancer in the world - more than 380,000 people are treated for the disease every year. WA Sweeping and Scrubbing has a legal obligation to ensure the health and safety of all their employees, and that includes any employee who may be placed at risk when working outdoors.

### Objective

Minimise the harmful impact of UV radiation when performing work outdoors.

### Policy

To reduce the risk of injury from exposure to UV radiation, WA Sweeping and Scrubbing will develop a sun safety program to:

- Organise work to avoid the UV peak of the day wherever possible
- Provide natural or artificial shade wherever possible
- Provide appropriate protective clothing (covering as much skin as possible, UPF rating of 30+, protective glasses, broad-brimmed hats or caps with neck-flaps)
- Ensure all protective equipment meets sun protection factors/Australian Standards
- Provide sunscreen
- Develop training and awareness programs to include:
  - Health effects of exposure to UV radiation and why outdoor employees are a high risk group
  - Factors affecting levels of UV radiation
  - Correct use of sun protection measures, and
  - Early detection of skin cancer

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## 5.7 Workplace Bullying Policy

WA Sweeping and Scrubbing recognises the risk to employee health and safety from exposure to bullying and has adopted a ZERO tolerance policy.

### Policy

Bullying is defined as “repeated, unreasonable behaviour, directed toward employees, who may create a risk to health and safety in the workplace”

Bullying can include:

- Verbal abuse
- Demeaning language
- Threats
- Outbursts of anger or aggression
- Humiliation
- Physical or verbal intimidation
- Excluding or isolating employees
- Deliberately:
  - Assigning meaningless tasks
  - Unrealistic volume of tasks
  - Withholding information that prevents persons from working effectively
  - Changing rosters to inconvenience person

WA Sweeping and Scrubbing will engage a 3-part approach to bullying.

1. Prevention:
  - a. Training employees about what constitutes bullying behaviour
  - b. Creating awareness of the health and safety risks associated with bullying
  - c. Encouraging reporting
2. Investigation:
  - a. All reports will be investigated by suitably trained persons
  - b. All cases will be investigated in a fair, unbiased manner following set guidelines
3. Control
  - a. Control strategies will be put in place that include (where relevant):
    - i. Re-assigning tasks/shifts/work locations
    - ii. Mediation (internal or external)
    - iii. Counselling
    - iv. Disciplinary action that could result in termination of employment

### Responsibilities

Principal Contractors/Management:

- Be familiar with bullying policy and investigation procedure
- Remain impartial and treat all cases fairly
- Manage each case in a confidential and timely manner
- Respond to all reported cases
- Ensure prompt referral to support/mediation
- Oversee controls and follow-up as required

Employees:

- Report bullying to supervisor and/or complete bullying report form

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## 5.7.1 Workplace Bullying Procedure

### Responsibilities:

All employees are responsible to ensure their behaviour in the workplace is appropriate for the work environment at all times and are to not act in a manner which could be considered or interpreted as being workplace bullying against other person/s. Employees are required to follow reasonable directions in respect of workplace bullying whilst working at WA Sweeping and Scrubbing.

Managers / Supervisors are responsible for:

- Identifying any inappropriate behaviour in the workplace that may lead to workplace bullying
- Assisting relevant employees with informal notifications and resolutions of workplace bullying incidents
- Informing and consulting with the OHS Manager or HSR regarding any reported workplace bullying matters or concerns as necessary

The OHS Manager or HSR is responsible for:

- Maintaining and reviewing the Workplace Bullying Procedure and records as required by legislation
- Ensuring all employees understand and are familiar with the Workplace Bullying Policy & Procedure
- Assisting relevant employees with informal or formal notifications and resolutions of workplace bullying
- Informing and consulting with the business owner/CEO regarding any reported workplace bullying matters or concerns as necessary

At WA Sweeping and Scrubbing the employer is responsible for ensuring that:

- There is an effective Workplace Bullying Procedure and supportive mechanisms in place
- All employees are trained and familiar with the Workplace Bullying Procedure
- Review of the Workplace Bullying Procedure is conducted as required

### Procedure:

A person who has been the subject of conduct which they believe constitutes workplace bullying may make a formal complaint or may seek to have the matter resolved on an informal basis. Information provided will be kept confidential and will not be shared with any other person without the consent of the employee involved.

Use the Workplace Bullying Report Form in conjunction with this procedure.

### Informal Complaint:

1. Directly approach the person who is bullying and ask that they stop.
2. If direct communication is not possible, or does not resolve the bullying, then discuss the matter with the OHS Manager or HSR, who will explain possible strategies for dealing with the bullying.
3. In consultation with OHS Manager or HSR, decide on a course of action to attempt a resolution
4. Once a satisfactory resolution is achieved, the matter will be monitored by *Person Responsible* to ensure there are no re-occurrences or further concerns.
5. Person Responsible and the employee will keep documentation during the resolution process.

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**Formal Complaint:**

1. Where attempts to resolve a complaint informally have failed, then a formal complaint can be made.
2. The employee should complete a Workplace Bullying Report Form, with supporting statements or documents attached, and submit the documents to *Person Responsible*
3. *Person Responsible* will investigate the complaint in consultation with the relevant persons.
4. Once the investigation has been completed, *Person Responsible* will make a finding as to whether workplace bullying has occurred, or whether it is likely to have occurred.
5. *Person Responsible* will then submit a detailed report with a recommended course of action to the appropriate decision-maker in senior management.
6. An appropriate course of action will then be decided and implemented, inclusive of consultation.
7. Where formal disciplinary action against a employee is required, it will be initiated in accordance with the relevant WA Sweeping and Scrubbing policies and procedures.
8. If required, and in accordance with relevant legislation, assistance to achieve an acceptable resolution will be initiated by WA Sweeping and Scrubbing management from the appropriate external Regulator.
9. State Authority will provide advice and guidance to relevant persons to assist the resolution process.
10. *Person Responsible* will then implement strategies following the guidance of State Authority to reach a satisfactory resolution.
11. *Person Responsible* will monitor the outcomes, document and maintain records.

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## Section 6 Incident & Hazard Reporting

### 6.1 Incident Reporting Policy

WA Sweeping and Scrubbing is committed to reducing the impact and severity of incidents in the workplace.

#### Objective

WA Sweeping and Scrubbing will identify and record all OHS incidents, whether or not these cause injury or damage, to ensure potential for harm is minimised and to prevent recurrence.

#### Policy

An incident can include injury, illness, fatality, near miss or dangerous occurrence.

WA Sweeping and Scrubbing will ensure the provision of coordinated Incident reporting by implementing documented procedures for:

- Emergency Response and harm minimisation action
- Notification to relevant Authorities for serious incidents/dangerous occurrence
- Incident reporting
- Responsible persons
- Incident investigation
- Consultation with relevant persons (confidential where applicable)
- Identification of root causes
- Corrective and Preventative Actions
- Review of effectiveness of corrective/preventative actions
- Regular review of all incidents to identify any trends
- Report and action identified trends
- Meet legislative requirements for record keeping

Comprehensive Incident Reporting and Incident Investigation forms will be provided.

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## 6.1.1 Incident Reporting Procedure

### Responsibilities:

All employees are responsible for the initial reporting of incidents.

Managers / Supervisors are responsible for:

- Informing employees & others (when applicable) about the requirement to report incidents promptly
- Ensuring that the Incident Report Forms are readily accessible for employees
- Complying with the Incident Reporting Procedure for incidents reported to them

The HSR / OHS Manager is responsible for:

- Maintaining and reviewing the Incident Reporting Procedure as required
- Ensuring all employees know about the procedure and are trained in how to follow the procedure
- Assisting managers, supervisors and employees to follow the procedure when required
- Informing and consulting with the business owner/CEO regarding incidents, in particular, Notifiable Incidents
- Notification of Notifiable Incidents to the relevant Regulator, within the prescribed timeframes
- Ensure, so far as is reasonably practicable, that the site where the incident occurred is not disturbed until an inspector arrives at the site or any earlier time that an inspector directs
- Maintaining records required by legislation relating to incidents, including the Register of Injuries

At WA Sweeping and Scrubbing the employer is responsible for ensuring that:

- There is an effective procedure in place for the immediate response to and management of incidents
- There is an Incident Reporting Procedure in place for the notification and management of incidents
- All employees are trained and familiar with the Incident Reporting Procedure and have easy access to the report forms and procedure
- State Authority is notified immediately after becoming aware that a Notifiable Incident has occurred
- So far as is reasonably practicable, that the site where any Notifiable Incident has occurred is not disturbed until an inspector arrives at the site or any earlier time that an inspector directs
- Review of the Incident Reporting procedure is conducted as required

### Procedure:

- Follow the Incident Response Procedure to ensure that employees are cared for and the incident area is cleared of people and secured to prevent further incident
- Report all incidents as soon as possible to *Person Responsible*
- When a Reportable Incident has occurred, *Person Responsible* determines whether the site needs to be preserved for investigation by the relevant Regulator
- Person involved with the incident completes an Incident Report Form
- If the person involved with the incident is not able to complete the form, *Person Responsible* will complete the form, in consultation with the involved person, if possible.
- A copy of the Incident Report form is provided to – the person involved and to *Person Responsible*
- *Person Responsible* records the incident on the Incident/Near Miss/Hazard Register
- A copy of the Incident Report is provided to any Principal Contractor, as required
- *Person Responsible* reports all Notifiable Incidents to the relevant Authority, within the timeframe required by legislation
- *Person Responsible* keeps records of incidents and injuries in accordance with Statutory requirements
- Follow the Incident Investigation procedure, if required

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## 6.2 Reporting Policy

WA Sweeping and Scrubbing is committed to the provision of a functional and effective OHS management system and as such, understands the value in seeking feedback on certain elements of this.

### Objective

To provide direction for nominated persons to provide feedback via reports submitted to Senior Management on selected OHS management system elements.

### Policy

WA Sweeping and Scrubbing will select nominated persons to report on the following:

Legislative:

- Injury reporting
- Notifiable incidents
- Health Monitoring
- Other legislated matters as relevant (such as Asbestos Removal Process, Plant registration etc)
- Reviews of risk controls
- Consultative arrangements

Non-legislative:

- OHS performance
- Results of audits
- Incident reports and investigation
- Corrective Actions
- Lost Time Injuries rates and times
- Return to Work statistics
- Hazard Identification
- Risk Assessments
- Safe Work Method Statements
- Preventative actions

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## Section 7 Induction & Training

### 7.1.1 Site Induction Procedure

#### Responsibilities:

All employees are responsible for actively participating in and completing the Site Induction and for following reasonable directions in respect of safety procedures whilst working at WA Sweeping and Scrubbing.

The HSR / OHS Manager is responsible for:

- Maintaining and reviewing the Site Induction Procedure as required
- Ensuring all employees complete their Site Induction prior to commencement of work
- Informing and consulting with the business owner/CEO regarding Site Inductions
- Maintaining employee induction records, including the Site Induction Checklist and the Site Induction Register

Managers / Supervisors are responsible for:

- Informing employees & others about the requirement to participate in and complete a Site Induction prior to commencement of work
- Ensuring that all people complete their Site Induction within the required timeframe

At WA Sweeping and Scrubbing the Employer is responsible for ensuring that:

- There is an effective Site Induction procedure and system in place
- All employees are trained and familiar with the Site Induction procedure and complete their Site Induction as required by the procedure
- Review of the Site Induction procedure is conducted as required

#### Procedure:

1. The inductee (new employee) will be informed that they are required to participate in and complete the Site Induction
2. *Person Responsible* will allocate a time and place for the site induction to be carried out, giving adequate notice to the new employee and in consultation with managers.
3. *Person Responsible* works through the induction with the inductee, step by step, and ensures that all the necessary site inspection and information is provided during the induction.
4. In consultation with the inductee, *Person Responsible* completes the Site Induction Checklist, as each part of the induction is successfully completed.
5. The Site Induction checklist is given to the inductee to sign and a signed copy is provided to:
  - a. The inductee (the employee)
  - b. The Human Resources Manager
  - c. The OHS Manager or HSR
6. Additional Site Induction will be provided if there are any changes to the work site that affect the health and safety of employees that requires new information / training to be given to employees.
7. A refresher of the Site Induction will be provided if it becomes evident that the employee is unfamiliar with any aspects of the induction or if they are determined to be deliberately non-compliant with site safety procedures by the appropriate manager
8. A Site Induction Register is maintained by *Person Responsible*.

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## 7.2 Training, Competency and Awareness Policy

Training is vital to assist employees to perform their work safely. WA Sweeping and Scrubbing will arrange training, which covers health and safety issues related to tasks being performed, as well as training in the overall approach to health and safety taken by our organisation.

### Objective

To provide training to all employees and contractors to ensure they have the skills and competencies to work in a manner that is safe and without risks to health.

### Policy

WA Sweeping and Scrubbing will:

- Conduct training needs analysis across the organisation
- Develop formal training needs and competencies for position requirements at all levels, including management
- Provide formal induction programs for new and transferred employees and contractors
- Use Registered Training Organisations (RTO) and appropriately accredited and approved courses/trainers
- Ensure training is competency based
- Record all training
- Review effectiveness of training
- Provide training for languages other than English and other relevant learning barriers

Training will include:

- All health and safety policies and procedures for the organisation
- Licenses and competencies to perform tasks
- Specific hazards and risk controls
- Consultation and communication arrangements
- Incident reporting and corrective actions
- Emergency Response

All managers and supervisors will be provided with additional training to ensure that they are aware of their responsibilities under the OHS Management System. This training includes legislative responsibilities for managers and supervisors, health and safety representatives training plus training in the principles of risk management.

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## 7.2.1 Training and Competency Procedure

### Responsibilities:

All employees are responsible for actively participating in and completing training and competency assessments (on-the-job, internal/external courses, formal qualifications, licenses) relevant to the performance of their position whilst working at WA Sweeping and Scrubbing.

Managers / Supervisors are responsible for:

- Informing employees about the requirement to participate in and completion of training and competency assessment as per the normal requirements of their position
- Ensuring that all employees complete training and are assessed as being competent to perform their duties within the required timeframe
- Ensuring adequate allocation of time and resources for employees to complete training as required
- Assisting with the co-ordination of the training of employees they are responsible for with the HSR / OHS Manager.

The HSR / OHS Manager is responsible for:

- Sourcing training and licensing service provision from qualified and suitable training service providers and the co-ordination of timetabling of training delivery for employees
- Maintaining and reviewing the Training and Competency Procedure as required
- Ensuring all employees complete training and competency assessments as required
- Informing and consulting with the business owner/CEO regarding employee training and competency as necessary
- Maintaining records required by legislation relating to employee training and competency, such as the Employee Training & Competency Register, the Plant Licence & Training Register for WA Sweeping and Scrubbing

At WA Sweeping and Scrubbing the employer is responsible for ensuring that:

- Provision of budget, resources and time allocation to enable employees to undergo training and competency assessment in accordance with the requirements of the legislation
- There is an effective employee training & competency assessment procedure and system in place
- Review of the Training & Competency Procedure is conducted as required

### Procedure:

WA Sweeping and Scrubbing will:

- Conduct training needs analysis across the organisation
- Develop formal training needs and competencies for position requirements at all levels, including management
- Provide formal induction programs for new and transferred employees and contractors
- Record all completed Induction Training in the Site Induction Register
- Determine, assess & record the training & competency needs and levels of contractors
- Use Registered Training Organisations (RTO) and appropriately accredited and approved courses/trainers
- Ensure training is competency based
- Record all training in the Employee Training & Competency Register and the Plant Licence & Training Register as appropriate
- Utilise the High Risk Work Licence Reference List for employees involved with High Risk Work
- Review effectiveness of training
- Provide training for languages other than English and other relevant learning barriers
- Provide managers and supervisors with additional training to ensure that they are aware of their duties & responsibilities under the WA Sweeping and Scrubbing OHS management system and the OHS legislation.

A refresher of Training or Re-Certification will be provided if it becomes evident that an employee is unfamiliar with any aspects of their training or if they are determined, via assessment & consultation, to be no longer competent to perform their job tasks by the business owner/CEO.

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## Section 8 Monitoring & Reviewing

### 8.1 Compliance Evaluation Policy

WA Sweeping and Scrubbing is committed to the development and implementation of an OHS Management System and understands the importance of evaluating the OHS Management system to ensure it is effective.

#### Objective

WA Sweeping and Scrubbing will establish an annual audit program to identify any areas for improvement and embrace any legal obligations that may arise from inspections undertaken by Regulatory bodies.

#### Policy

WA Sweeping and Scrubbing will implement the following:

- In-house inspections as required
  - Pre-operational
  - Daily
  - Weekly
  - Monthly
  - 6 monthly
  - 12 monthly
- Routine maintenance programs
- Internal audits
- External audits
- Health Surveillance Monitoring where required
- Resourcing for Inspections by Regulatory bodies

Audits to evaluate compliance will be undertaken in line with:

- Legal obligations
- OHS Act 2004 & OHS Regulations 2007
- XYZ Company OHS policies and procedures
- AS/NZS 4801: Occupational Health and Safety Management Systems
- OHSAS 18001:2007 Occupational Health and Safety Management Systems Requirements

Results of audits/inspections will be analysed, corrective actions identified and rectified in a timely manner.

Results of audits, inspections and any corrective actions will be communicated to employees and relevant contractors.

Regular meetings will take place with Senior Management to report on progress of Corrective Actions and to identify trends/areas for improvement.

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## 8.1.1 Document & Record Keeping Procedure

### Responsibilities:

All employees are responsible for being aware of, understanding and following the Document and Record Keeping Procedure when undertaking tasks involving workplace safety and the OHSMS whilst working at WA Sweeping and Scrubbing.

Managers / Supervisors are responsible for:

- Informing employees and others about the requirement to appropriately record, store, and manage OHSMS information and documents in accordance with the Document and Record Keeping Procedure whilst working at WA Sweeping and Scrubbing.
- Ensuring that all people are adequately trained in how to access, record, store and manage OHSMS information and documents in the workplace.
- Ensuring that suitable tools and resources are available to all employees to enable readily accessible and effective document and record keeping to occur.
- Maintaining and managing documentation and records required by OHS legislation relating to OHS and Employee's Compensation.

At WA Sweeping and Scrubbing the EMPLOYER is responsible for ensuring that:

- There is an effective Document and Record Keeping Procedure along with associated tools and resources in place and that they meet OHS and Employee's Compensation legislative requirements
- All employees are trained and familiar with, have access to, and follow the procedure required for aspects of document and record keeping for which they are personally responsible for while working at WA Sweeping and Scrubbing
- That other persons who are impacted by OHS at WA Sweeping and Scrubbing, such as other employer's and visitors, are included in or consulted about document and record keeping at WA Sweeping and Scrubbing any as required
- Review of the Document and Record Keeping Procedure is conducted as required.

### Procedure:

1. Prior to creating new documents consider:
  - a. Approval – employees should first determine if they are the most appropriate person to create or revise a OHS Management System (OHSMS) document and if they require approval to do so before proceeding.
  - b. The need for the document – purpose, legislative requirement, availability of existing document in the OHSMS that has the same / similar purpose & scope, consultation required
  - c. The contents – scope, context and technical content.
  - d. Compliance – legislative requirement, related notifications.
  - e. References – legislation, Compliance Codes, Codes of Practice, Australian Standards, relevant information.
2. Select the type of OHS documentation required – Policy, Procedure, Risk Assessment, Safe Work Method Statement, Safe Work Procedure, Safety Alert, Record, Register, Tools (forms, checklists, templates, guidelines) etc.
3. Creating new or revised documents:
  - a. Use the standard format, content and templates that has been developed and approved.
  - b. Headings within templates are not to be removed and are required as a minimum when adding contents.
  - c. Headers and footers are not to be removed.
  - d. Compulsory actions are to be indicated by the word “shall”.
  - e. Agreed text format should be used (font type and size).

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- f. Documents in Draft form are to be clearly identified.
  - g. Version numbers and the date of issue are to be identified on the document.
  - h. The naming protocol should be determined prior to development and should follow the existing OHSMS naming protocols.
4. OHSMS documents are to be saved and edited as agreed.
  5. Approval and Authorisation – documents are to be submitted to *Person Responsible* for consultation, approval and authorisation.
  6. Notification:
    - a. Employees will be notified of changes and additions to OHSMS documentation in accordance with the Consultation arrangements at WA Sweeping and Scrubbing.
    - b. The appropriate OHS Manager/HSR will maintain a record of all notifications.
    - c. It is the responsibility of managers and supervisors to ensure all employees are informed of the changes and additions to OHSMS documentation.
  7. Accessibility:
    - a. Documentation shall be available to employees electronically and/or in hard copy at all work locations.
    - b. If documentation is supplied in electronic form, all employees are appropriately trained and are readily able to access the documentation.
    - c. Employees who have been provided with a hard copy of documentation are responsible to ensure it is up to date and is not damaged so as to make reading or using the documents difficult.
    - d. A back-up system for both electronic and hard copy documentation is in place.
  8. Superseded documents are to be removed from the OHSMS and stored in the WA Sweeping and Scrubbing archives.
  9. Notifiable Documentation and records – are submitted to appropriate Authorities as and when required and within the necessary timelines.

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## 8.1.2 External Auditing Procedure

### Responsibilities:

All employees are responsible for participating in and co-operating with External Audits when required by the OHS Manager / HSR in respect of being interviewed and providing information as required.

Managers / Supervisors are responsible for:

- Informing employees & others about the requirement to participate and co-operate with the audit process as required. Consulting with employees about audits
- Ensuring that employees are made available for participation in audits when required
- Liaison with the auditor and the OHS Manager / HSR to ensure the smooth conduct of audits
- Participating in and co-operating with the audit process as required. Attending audit meetings
- Assisting with implementation of Corrective Actions and follow ups as required.

The OHS Manager/HSR is responsible for:

- Maintaining and reviewing the External Auditing Procedure as required
- Appointment of suitably qualified External Auditors, negotiating the Terms of Engagement and determining the Scope of the External Audit with the proposed auditor, in consultation with the employer
- Ensuring that appropriate Audit documentation is available and used to conduct the External Audit
- Assisting managers, supervisors and employees to participate in audits and/or Corrective Actions when required
- Informing and consulting with the business owner/CEO regarding the audit process, in particular, the scheduling of audits, audit outcomes, and the address of Corrective Actions
- Coordinating the completion of corrective actions and follow up meetings and audits as required
- Maintaining adequate records in respect of all External Audits

At WA Sweeping and Scrubbing the employer is responsible for ensuring that:

- WA Sweeping and Scrubbing Company carries out External Audits as per legislative requirements
- There is an effective External Auditing Procedure and supportive mechanisms in place
- The auditors who are engaged to co-ordinate, conduct and document Audits are adequately trained and qualified to undertake such tasks
- All employees who are required to appoint, liaison with and assist auditors are trained and familiar with the External Auditing Procedure
- Review of the External Auditing Procedure is conducted as required

### Procedure:

1. The OHS Manager/HSR determines the need for an External audit and submits information and recommendations to the employer, for approval of an External Audit to proceed.
2. Upon approval to proceed, the OHS Manager / HSR:
  - a. Determines the nature and scope of the audit
  - b. Investigates a suitable experienced and qualified Auditor
  - c. Negotiates the Terms of Engagement of the Audit
  - d. Engages the Auditor
3. The OHS Manager/HSR will consult with relevant Managers and employees to schedule in the audits and to arrange for employees to be allocated time to participate in the audit process as required.

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4. Information will be collected via:
  - a. Interviews:
    - i. Interviews of a cross section of employees including managers, supervisors, team members
    - ii. Interviews will be conducted in a manner that provides individuals to provide information without being influenced by other team members, supervisors or managers
  - b. Observation of Activities:
    - i. This may involve taking photographs for inclusion in audit reports
  - c. Review of documents
    - i. Including Employees' Compensation records, Incident / Hazard Reports & Register
5. Information gathered during audit will be categorised into levels of compliance:
  - a. Compliant - minimum requirement met
  - b. Non-Compliant - legislative requirement is NOT met, corrective action required
  - c. Unknown - lack of evidence or information to enable verification during the audit
  - d. Not Applicable - not applicable for this workplace / task
6. Information and evidence collected during the audit will be documented in a detailed External Audit Checklist and Summary Report by the auditor
7. Notes from interviews and original photographs will be kept with the External Audit Summary Report as evidence collected by the auditor
8. The External Audit Checklist and Summary Report will be submitted to the OHS Manager/ CEO inclusive of a list of Recommended Corrective Actions for the management to address
9. Follow up meetings between the OHS Manager/CEO will occur to ensure the Corrective Actions are completed in a suitable timeframe.

Note:

Should any evidence collected during the External Audit suggest an extreme risk exists, this information must be communicated directly to OHS Manager/CEO immediately. Work tasks involving the identified extreme risk must stop until effective control measures have been implemented.

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## 8.1.3 Internal Auditing Procedure

### Responsibilities:

All employees are responsible for participating in and co-operating with Internal Audits when required by the OHS Manager / HSR, in respect to being interviewed and providing information as required.

Managers / Supervisors are responsible for:

- Informing employees and others about the requirement to participate and co-operate with the audit process as required. Consulting with employees about audits.
- Ensuring that employees are made available for participation in audits when required.
- Liaison with the auditor and OHS Manager / HSR to ensure the smooth conduct of audits.
- Participating in and co-operating with the audit process as required. Attending audit meetings.
- Assisting with implementation of Corrective Actions and follow-ups as required.

The HSR / OHS Manager is responsible for:

- Maintaining and reviewing the Internal Auditing Procedure as required.
- Conducting Internal Audits including response to Corrective Actions as identified during the audit process.
- Assisting managers, supervisors and employees to participate in audits and/or Corrective Actions when required.
- Informing and consulting with the business owner/CEO regarding audits, in particular, the scheduling of audits, audit outcomes, and the address of Corrective Actions.
- Maintaining adequate records in respect of all Internal Audits.

At WA Sweeping and Scrubbing the employer is responsible for ensuring that:

- WA Sweeping and Scrubbing carries out adequate and regular Internal Audits as per legislative requirements.
- There is an effective Internal Auditing Procedure and supportive mechanisms in place.
- The employees who are required to co-ordinate, conduct and document Audits are adequately trained and qualified to undertake such tasks.
- All employees who are required to conduct and/or participate in audits are trained and familiar with the internal Auditing Procedure.
- Review of the Internal Auditing Procedure is conducted as required.

### Procedure:

1. The OHS Manager / HSR conducts an Internal Audit at (time of year / intervals).
2. The OHS Manager / HSR must be suitably trained and experienced in the conduct of OHS audits.
3. The Internal Audit will include Desk Top Audits and Site Audits.
4. At least one (1) Internal Audit will be conducted annually.
5. The OHS Manager / HSR will consult with relevant Managers and employees to schedule in the audits and to arrange for employees to be allocated time to participate in the audit process as required.
6. Information will be collected via:
  - a. Interviews:
    - i. Interview of a cross section of employees including managers, supervisors, team members
    - ii. Interview will be conducted in a manner that provides individuals to provide information without being influenced by other team members, supervisors or managers.
  - b. Observation of Activities:
    - i. This may involve taking photographs for inclusion in audit reports.
  - c. Review of documents
    - i. Including Employees' Compensation records, Incident / Hazard Reports & Registers.

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7. Information gathered during audit will be categorised into levels of compliance:
  - a. Compliant – minimum requirement met
  - b. Non-Compliant – legislative requirement is NOT met, corrective action required
  - c. Unknown – lack of evidence or information to enable verification during the audit
  - d. Not Applicable – not applicable for this workplace / task
8. The auditor will document information and evidence collected during the audit in an Internal Audit Report.
9. Notes from interview and original photographs will be kept with the Internal Audit Report as evidence collected by the auditor.
10. The Internal Audit Report will be submitted to the *OHS Manager/CEO* inclusive of a list of Recommended Corrective Actions for management to address.
11. Follow up meetings between the *OHS Manager/CEO* will occur to ensure the Corrective Actions are completed in a suitable timeframe.

Note:

Should any evidence collected during the Internal Audit suggest an extreme risk exists, this information must be communicated directly to *OHS Manager/CEO* immediately. Work tasks involving the identified extreme risk must stop until effective control measures have been implemented.

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## 8.2 Legislative Change Policy

WA Sweeping and Scrubbing is committed to providing a safe and healthy workplace for employees, contractors and visitors that embraces opportunities to improve knowledge about new legislation and best practice solutions.

### Objective

WA Sweeping and Scrubbing will proactively seek out advice, education and industrial knowledge to foster continual improvement in OHS systems and updates of relevant legislation.

### Policy

WA Sweeping and Scrubbing will endeavour to manage legislative change by:

- Assigning responsibilities for researching legislative changes with State and Federal Authorities
- Participate in learning opportunities such as information sessions provided by Industry Stakeholder Groups, Unions, and relevant Authorities
- Seek advice from suitably qualified persons where required (such as Occupational Consultants)
- Attending conferences, trade shows etc. where possible
- Ensuring refresher training is undertaken where required
- Liaising with local Authorities as required

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## 8.3 Management Review Policy

WA Sweeping and Scrubbing recognises the importance of reviewing the adequacy and effectiveness of the OHS Management System and objectives to identify opportunities for improvement.

### Objective

Establish a Management Committee to review the OHS Management System and identify areas for improvement.

### Policy

Management meetings will be held at regular intervals and will include the following agenda items:

- Review of internal and external audit results, inspection and other compliance programs
- Evaluation of legal compliance issues
- Results of participation and consultation from all levels - management, employees and contractors
- Performance evaluation of the OHS management system and objectives
- Status of incident reports, investigations, corrective and preventive actions
- Communication from interested parties, complaints - action taken status and suggestions
- Management of change
- Corrective Actions, Accountability and Timeframes
- Follow-up on previous management reviews

Meeting intervals/timeframes will be determined on a risk basis.

Meeting minutes will be recorded and results of these will be provided to Senior Management/ Directors/ Board Members.

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## 8.4 Records and Document Management Policy

WA Sweeping and Scrubbing is committed to the provision of a written OHS management system and keeping records that meet legislative requirements.

### Objective

To provide direction for the implementation of OHS document and record control at WA Sweeping and Scrubbing to ensure all legislative requirements are met and that all persons are using the latest OHS documentation.

### Policy

WA Sweeping and Scrubbing will establish the following for the generation and management of OHS documents and records:

- Create an administration system (such as TRIM files) to contain documents
- Create a record control register to capture the following information:
  - TRIM (or other file system) number
  - Document number
  - Document title
  - Initial issue date
  - Current version number
  - Current version issue date
  - Next review date
  - Responsible officer

All printed documents are considered uncontrolled.

The documents are to be approved by the Managing Director and only nominated people shall have the authority to create and modify documents.

External documents such as Law Guides, Standards and Legislation are controlled through subscription to on-line databases, which maintain up-to date versions of all documents.

Health and safety records are controlled in accordance legislative requirements. Nominated persons shall have responsibility for holding, storing, retaining and disposition of OHS related records.

WA Sweeping and Scrubbing will ensure records are kept in line with specific legislative requirements for health monitoring data, injury records, Risk Assessments, Safe Work Method Statements, Notifiable Incidents and other specified matters. Records will be kept for the required timeframe and will be accessible for review by Regulatory bodies and/or Health and Safety Representatives as appropriate.

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## Section 9 Plant, Equipment & Structures

### 9.1 Personal Protective Equipment (PPE) Policy

The purpose of PPE is to protect the employees of WA Sweeping and Scrubbing from exposure to workplace hazards. WA Sweeping and Scrubbing will provide employees with suitable PPE for the site or where required for certain tasks at no cost to the employee.

PPE is not a substitute for more effective controls and it will only be considered when other means of protection are not reasonably practicable.

#### Objective

WA Sweeping and Scrubbing will endeavour to provide protection from workplace hazards by developing a system to manage the selection, use and maintenance of PPE where required.

#### Policy

WA Sweeping and Scrubbing will:

- Ensure PPE is suitable with regard to:
  - Nature of the work
  - Hazards associated with work
  - Suitable size and fit
  - Reasonably comfortable to wear for type of task and intended duration of task
  - Maintained, repaired and replaced to ensure it remains effective in minimising risk to employees
- Select quality PPE to meet legislative requirements and relevant Australian Standards
- Provide training, guidance, and assistance to supervisors and employees on the proper selection, use, care, and cleaning of approved PPE
- Develop and make accessible, instructions for selection, use, maintenance, cleaning of PPE
- Clearly designate areas where PPE is required and display signs
- Periodically re-evaluate the suitability of previously selected PPE
- Develop a system to inspect PPE to ensure it is clean, hygienic and in good working order
- Conduct inspection and checks as required to ensure PPE is being used by employees
- Review, update and conduct PPE suitability assessments whenever
  - A job changes
  - New equipment is used
  - There has been an incident
  - A supervisor, employee or Health and Safety Representative requests it
  - Or at least every year
- Maintain records on PPE assignments and training

Employees of WA Sweeping and Scrubbing are required to wear PPE as instructed, not misuse or deliberately damage PPE, and inform management of any damage, defect or contamination of PPE that may render the PPE unusable.

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## 9.2 Plant and Equipment Policy

WA Sweeping and Scrubbing recognises its responsibility to provide and maintain a safe workplace, including the identification of hazards and control of risks associated with plant.

### Objective

WA Sweeping and Scrubbing will take a consultative approach to ensure risks associated with plant, whether owned, leased or hired, are eliminated or reduced as far as practicable, and injuries to employees (including contractors and employees of contractors), and visitors are minimised.

### Policy

WA Sweeping and Scrubbing will endeavour to prevent injury and eliminate hazards associated with plant by ensuring:

- No plant is bought onto site and commissioned unless health and safety risks are controlled
- Plant is installed/commissioned by suitably qualified persons and risks during these activities are monitored
- Plant is used only for its designed purpose unless an assessment has been carried out by a suitably qualified person for any other proposed use
- Plant complies with OHS legislative requirements for guarding, operator controls, cleaning, maintenance and testing and other requirements as required
- A documented system is developed and implemented to identify hazards, conduct risk assessments where required, and select suitable controls for installation, commission, use, cleaning/maintenance and decommission/dismantling. Risk controls will be selected following a hierarchy of control:
  - Elimination
  - Substitution
  - Engineering Controls
  - Isolation
  - Administrative Controls
  - Safe work procedures
- Adequate training, information, instruction and supervision as required
- All persons obtain Licences to Perform High Risk Tasks where required
- Risk controls are reviewed whenever:
  - Control is no longer effective
  - Before any change likely to introduce new or different hazards that current controls will not adequately address
  - A new hazard or risk is identified
  - Results of consultation indicate a review is needed
  - Where requested by employees or Health and Safety Representative
  - As per manufacturer's instructions

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## 9.2.1 Management of Plant & Equipment Procedure

### Responsibilities:

Employees who are required to use, operate and /or maintain plant and equipment must ensure they follow the steps listed below and, as required, to follow those instructions at all times. Employees will be provided with information and training to enable them to comply with the procedure.

Managers / Supervisors are responsible to ensure that the Management of Plant and Equipment Procedure is implemented within their department, that all employees are familiar with the procedure, and that the procedure is followed.

The CEO or General Manager is responsible to ensure there is a safe system in place for all aspects of the management of plant and equipment which meets both the purpose of this procedure and the requirements of OHS legislation.

### Procedure:

- Acquisition:
  - Follow the WA Sweeping and Scrubbing Purchasing Procedure for the acquisition of all plant and equipment.
- Licensing and Certification:
  - Determine the Certification requirements of plant and equipment, and Licencing requirements for operators, as required by the relevant Authorities. This must be done prior first use at WA Sweeping and Scrubbing.
- Employee Training and Qualification – Plant requiring Certification:
  - Ensure that employees who will be responsible for the management, operation, use, maintenance and disposal of plant and equipment that requires Certification hold current operator’s licenses and are fully trained and competent as required by the relevant Authorities.
- Employee Training – Equipment not requiring Certification:
  - Employees must be trained to safely operate the equipment by a person who is suitably competent / experienced in its operation.
  - If an experienced person is not available, the employee’s manager must ensure the manufacturer’s operating instructions are available, read and understood by the employee before operation commences.
  - A Safe Work Procedure shall be explained and demonstrated during training, including any Risk Assessment for the equipment.
  - The employees must be able to demonstrate the safe operation of the equipment under supervision before being allowed to operate the equipment unsupervised.
- Maintenance and Pre-start checks:
  - Before any plant or equipment is cleaned, serviced, repaired or modified appropriate control measures, including engineering controls where applicable, must be implemented to prevent accidental or deliberate operation. For example: isolation from electricity, removal of keys, lock out and tag etc.
  - Pre- operational checks must be conducted on all plant prior to use. These may be daily, weekly, monthly, 6 monthly and annual checks as recommended by the manufacturer.
  - All plant and equipment will be stored, cleaned, serviced, repaired and maintained as per the manufacturer’s recommendations.

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- Return of plant or equipment to service:
  - A record of any inspection, maintenance, repair or alteration to plant is to be made on the Plant & Equipment Register.
  - A qualified person is to verify and approve that the plant or equipment is safe for use, prior to it being used again after having been taken out of service.
  - If plant or equipment has been locked out or tagged, the qualified person will re-commission the plant or equipment and advise employees that it is back in service and is safe to use.
  
- Testing and Tagging:
  - Plant will be inspected / checked by an Authorised Person and will have inspection tags / labels placed on them as required by the relevant Authority.
  - Equipment will undergo regular checks to ensure it is fully functional and safe to use.
  - Plant or equipment that fails testing, or is found to be unsafe, damaged, will be removed from service and will be locked out / tagged as appropriate.
  - Records shall be kept of all testing and tagging of plant and equipment.
  
- Operation:
  - All plant and equipment must be used or operated as per the manufacturer's recommendations.
  - Employees will follow the guidance provided in Safe Work Method Statements, Safe Work Procedures, Risk Assessments and as outlined by on-the job training and/or supervision as required when using or operating plant and equipment.
  - Under no circumstances is faulty or damaged plant or equipment to be used.
  
- Disposal:
  - Before disposal plant and equipment may need to be rendered inoperable, or de-commissioned to leave it safe for disposal. This may be required to prevent the potential of injury to persons and pollution or damage to the environment during or after disposal.
  - All plant and equipment that is to be disposed of must be disposed of in an environmentally suitable manner and in accordance with Local Authority requirements.

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## 9.3 Purchasing Policy

The most effective way of reducing risks to health and safety in the workplace is through elimination. WA Sweeping and Scrubbing is committed to eliminating hazards before they are introduced into the workplace by the implementation of a OHS purchasing policy.

### Objective

WA Sweeping and Scrubbing will ensure suitable consideration is given when purchasing equipment, materials, facilities, chemicals (substances) or contractors, which may have an adverse impact on health and safety.

### Policy

WA Sweeping and Scrubbing will implement a purchasing policy that incorporates the following:

- Specific guidelines for any person who purchases, leases or hires goods and services
- Training provided for any person responsible for the above
- Consideration of the following:
  - Consultation
  - Specify OHS requirements with supplier before purchasing
  - Determine OHS risks
  - Conduct risk assessments
  - Obtain OHS information, manuals, instructions, design specifications
  - Compliance with legislation, Australian Standards etc
  - Employee capability/training/licensing requirements
  - Appropriate risk control strategies in place for use, transport and storage
  - Choosing best practice/least hazardous options
  - Review purchased item prior to accepting admission into workplace
  - Adequate documentation/records are kept
  - Documentation for the hiring of contractors or labour hire employees must include reference to site specific OHS risk, provision for OHS inductions, and records for the review of OHS performance

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## 9.3.1 Purchasing Procedure

### Responsibilities:

Employees who are required to acquire equipment, materials or chemicals (substances) must ensure they follow the steps listed below and, as required, to follow those instructions at all times. Employees must be provided with information and training to enable them to comply with this procedure.

Managers / Supervisors are responsible to ensure that the Purchasing Procedure is implemented within their department, that all staff are familiar with the procedure, and that the procedure is followed.

The OHS Manager/CEO is responsible to ensure there is a safe system in place for the purchase, acquisition and procurement of equipment, materials and chemicals (substances) which meets both the purpose of this procedure and the requirements of OHS legislation.

### Procedure:

1. Determine need for item to be purchased and the potential supplier/s.
2. Gather information about the item in respect of safety (use, storage and disposal) including potential hazards or risks. Information can be obtained from: Compliance Codes, Codes of Practice, Material Safety Data Sheets, Operational Manuals, Safe Work Procedures, Australian Standards, Industry Standards, suppliers, manufacturers etc.
3. Use information to determine if there are any associated hazards or risks for the item.
4. Conduct a formal Risk Assessment if appropriate.
5. Submit all information regarding the purchase of the item, including any Risk Assessment to the OHS Manager/HSR.
6. The OHS Manager/HSR assesses the information and determines if the purchase will proceed or not.
7. If purchase is not approved to proceed – investigate an alternative item which is less hazardous, and/or seek further information as to what would be required for safe acquisition of the item.
8. If purchase is proceeding - attempts to eliminate any new hazards from being introduced into the workplace should be attempted prior to supply. Where this is not possible, risk control measures shall be determined and implemented to minimise the risk of injury or illness.

All staff who are required to use, store, handle the item must be trained in the safe use of the item, ensuring they are aware of the hazards and risks associated with the item. This must be completed prior to first use of the item, and with supervision as required.

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## Section 10 Risk Management

### 10.1 Contractor Management Policy

All contractors, sub-contractors and employees of contractors, engaged to perform work on XYZ Company premises or other nominated locations, are required to comply with relevant Legislation, Standards, Compliance Codes, Codes of Practice, WA Sweeping and Scrubbing’s health and safety policies, procedures and programs and to maintain current public liability and employees compensation insurance.

#### Objective

To incorporate OHS requirements into every stage of contractor selection, approval, work processes and completion.

#### Policy

WA Sweeping and Scrubbing will allocate responsibilities as follows:

- WA Sweeping and Scrubbing Contract Managers:
  - Review OHS considerations for job
  - Review contract to ensure OHS requirements are met, including any additional controls
- WA Sweeping and Scrubbing Site Management:
  - Induction for contractors
  - Permits to work
  - Licenses, competencies
  - Safe Work Method Statements
  - Hazard identification, risk assessments and risk controls
  - Supervision
- Contractor:
  - Evidence of OHS management system in place
  - Evidence of licenses, training and competency to perform work
  - Development and implementation of Safe Work Method Statements and hazard identification, risk assessments and risk controls
  - Compliance with above
  - Compliance with OHS legislation, site rules and participate in government inspections where required
  - Participate in site OHS/toolbox meetings and site consultative arrangements

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## 10.1.1 Contractor Management Procedure

### Responsibilities:

WA Sweeping and Scrubbing Contract Managers:

- Review OHS considerations for job
- Review contract to ensure OHS requirements are met
- Provide contractors with the XYZ Company OHS Management Plan and access to all relevant documentation and systems to enable them to operate safely during the project

WA Sweeping and Scrubbing Site Management:

- Induction for contractors
- Permits to work, Licences, competencies
- Safe Work Method Statements, hazard identification, risk assessments and risk controls
- Supervision
- Complete a Contractor Evaluation Form and ensure contractor requirements have been met
- Periodically conduct spot inspections and complete a Spot Inspection Form

Contractor/ Sub Contractor/Employees of Contractor:

- Provide evidence of OHS management system in place, before commencement of work
- Provide evidence of licenses, training and competency to perform work
- Development and implementation of Safe Work Method Statements and hazard identification, risk assessments and risk controls
- Compliance with above
- Compliance with OHS legislation, site rules and participate internal or external inspections and investigations where required
- Participate in site OHS/toolbox meetings and site consultative arrangements

### Procedure:

Prior to the allocation of contracts, prospective Contractors must supply:

- Copies of relevant permits, licences, certificates
- Public liability insurance information and other insurances as relevant
- Safe Work Method Statements or documented safety instructions for intended tasks
- Evidence of an adequate OHS Management System in place and job ready

On award of contract:

- Copies of site-specific Safe Work Method Statements, Risk Assessments and other documented safety information relevant to the project
- SWMS must meet the criteria outlined in the SWMS Checklist
- Relevant training records for any person working onsite (e.g. General Construction Induction Cards)
- Evidence of the method of supervision for all employees
- Existing health and safety consultative arrangements (including any existing work groups, elected HSRs and Deputy HSRs)
- Contact numbers for management representatives

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During project work all Contractors, Subcontractors and their employees must:

- Follow site safety rules
- Follow traffic management plans for site
- Follow site-specific SWMS and Safe Work Procedures
- Ensure all activities performed are in line with OHS legislation
- Conduct their work in a manner that does not put others at risk from their action or inactions
- Participate in consultative arrangements and inform others of potential OHS hazards that may arise from their activities
- Cooperate with spot checks and internal or external inspections and / or investigations
- Report any near-miss, injury or illness that occurs as part of the project
- Not bring any items onto site that are not maintained adequately or are unsafe in any way
- Complete all documentation as and when required
- Treat all shared amenities with respect
- Behave in an appropriate manner at all times when on the work site, being aware that WA Sweeping and Scrubbing has a ZERO tolerance policy for Workplace Bullying, Harassment and Discrimination

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## 10.2 Environmental Policy

### Aim

WA Sweeping and Scrubbing is committed to conducting our business in an environmentally aware and responsible manner. We seek the co-operation of our employees and business partners in ensuring our organisational practices are conducted with minimal environmental impact.

### Objective

To work with employees, visitors and business partners to achieve compatibility between economic development and the maintenance of the environment to minimise harm.

### Policy

WA Sweeping and Scrubbing will endeavour to minimise impact on the following:

- Atmospheric emissions
- Site contamination and spills
- Noise Emission
- Damage to flora and fauna
- Storm water management
- Unnecessary energy consumption

To fulfil this commitment, WA Sweeping and Scrubbing, will observe all environment laws and promote environmental awareness among all employees to increase understanding of environmental matters.

WA Sweeping and Scrubbing will actively take part in the following:

- Assess Eco-footprint to identify environmental impacts and move towards more sustainable practices
- Identify waste streams and options for effective waste management
- Improve purchasing (buy recycled materials, reduce waste, use less harmful/volatile chemicals)
- Improve storage (reduce quantity, waste and spills, reduce odours by keeping containers closed)
- Conserve energy (eco-friendly lights, turn lights off, emergency efficient equipment, greener fuel sources – such as LPG and methane)
- Conserve water (install water saving accessories, repair leaks)
- Preserve waterways (clearly mark and protect storm water drains)
- Emergency planning and spill response
- Seek appropriate licenses/permits from State Environmental Protection Agencies and other relevant Authorities
- Improve education/awareness
- Notify relevant authority in the event of a major environmental impact

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## 10.3 Objectives and Targets Policy

WA Sweeping and Scrubbing is dedicated to providing a workplace that is free of injury and illness and promotes a culture of safety first. WA Sweeping and Scrubbing is committed to making OHS an integral part of decision making in all operations.

WA Sweeping and Scrubbing will measure objectives based on the following:

- Reduction in Lost Time Injury rate annually
- Reduction in Lost Time Injury – average days lost
- Inspections/audits completed within specified timeframes
- Corrective Actions completed within specified timeframes
- Legislative Requirements met
- Emergency Management Plan practices undertaken within specified timeframes
- Employee satisfaction survey
- Review of consultative arrangements

Performance targets will be set specific to the workplace and incorporated into Position Descriptions and Performance Evaluation for individuals and organisation.

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## 10.4 Risk Management Policy

Risk is inherent in all WA Sweeping and Scrubbing functions. All WA Sweeping and Scrubbing personnel are responsible for managing the risks that relate to their particular area of work. Risks should be managed in a way that derives the best outcomes for XYZ Company and its stakeholders.

### Objective

To embed principles of effective risk management into existing practices all levels of the organisation.

### Policy

The following structure for risk management will apply:

- Where specific Regulations require certain controls, XYZ Company will ensure compliance with those matters In consultation with relevant persons (including Duty Holders/Contractors):
  - Hazard Identification:
    - Identify reasonably foreseeable hazards that may pose risks to health and safety
  - Manage risk
    - Where risk cannot be eliminated, it will be minimised so far as is reasonably practicable
  - Evaluate risks where required
    - Compare estimated levels of risk against pre-established criteria (such as a risk matrix) and consider the balance between potential benefits and adverse outcomes
  - Implement risk controls
    - Selection of controls will follow a hierarchy:
      - Substitution with less hazardous options
      - Isolate persons from the hazards
      - Use of engineering controls
    - Where risk still remains:
      - Implement administrative controls
    - Where risk still remains:
      - Use of Personal Protective Equipment
    - Any one or combination of these controls will be used as appropriate.
  - All controls must be fit for purpose, suitable for the nature and duration of task and installed, set-up and used correctly
  - Risk controls will be reviewed whenever:
    - Control is no longer effective
    - Before any change likely to introduce new or different hazards that current controls will not adequately address
    - A new hazard or risk is identified
    - Results of consultation indicate a review is needed
    - Where requested by employees or Health and Safety Representative.

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## 10.4.1 Risk Management Procedure

### Responsibilities:

All employees are responsible for working safely and for following reasonable directions in respect of the OHS Risk Management Procedure and associated mechanisms whilst working at WA Sweeping and Scrubbing.

Managers / Supervisors are responsible for:

- Informing employees & others about the requirement to actively participate in risk management strategies and to follow risk management policies and procedures whilst working at WA Sweeping and Scrubbing.
- Ensuring that all people are adequately trained in how to participate in risk management activities in the workplace.
- Maintaining records required by OHS legislation relating to risk management.

At WA Sweeping and Scrubbing the employer is responsible for ensuring that:

- There is an effective Risk Management Procedure and associated mechanisms in place and that they meet OHS and Employee's Compensation legislative requirements.
- All employees are trained and familiar with, have access to, and participate in Risk Management policies, procedures and activities while working at WA Sweeping and Scrubbing.
- Those other persons who are impacted by OHS at WA Sweeping and Scrubbing, such as other employers, self employed persons and visitors, are included in risk management strategies as required.
- Review of the Risk Management Procedure is conducted as required.

### Procedure:

WA Sweeping and Scrubbing has implemented a step-by-step mechanism to provide the required system and tools to ensure effective risk management in the workplace. As follows:

1. Communication – the Consultation Policy and procedure is in place to enable risk management to be implemented in a systematic and effective manner, involving all people impacted by OHS at WA Sweeping and Scrubbing. Effective consultation and planning is important during every phase of the Risk Management Procedure and associated activities.
2. Hazards are identified and reported via the following:
  - a. Consultation – OHS Meetings, Health & Safety Representatives, briefings, direct discussions
  - b. Workplace inspections
  - c. Audits – internal & external (photos, observations, checklists, reports)
  - d. Reporting – Incident Forms & Incident Register, Hazard Report Form, Hazardous substances/DG Register etc.
  - e. Research – information is gathered and interpreted from State & Local Authorities, Manufacturers, Suppliers, Industry groups, other employers & employees
3. Risk Assessment – site specific, task specific, chemical Risk Assessments are conducted as required by suitably trained and experienced employees.
4. Actions Prioritised – once risk levels have been assessed, a list of action priorities is determined.
5. Risk Control – identified hazards are systematically eliminated or reduced by implementing practical control measures. A Hierarchy of Controls is used.
6. Monitor & Review – regular checks are carried out to ensure that suitable control measures have been implemented, that they continue to be adequate, and that no new hazards have been introduced into the workplace either by implemented control actions or by changes to the workplace.
7. Documentation – all risk management activities conducted and the outcome of those activities, in particular, those outlined in this procedure, are fully documented and records maintained.

It is important that employees continue to look for hazards in the workplace at all times, not just during risk management activities. All hazards that cannot be eliminated immediately must be reported to the Person Responsible using the Hazard Reporting Procedure.

The potential for the introduction of new hazards in the workplace should be considered when planning or changing work tasks, equipment etc. in the workplace.

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## 10.5 Roles, Responsibilities and Accountabilities Policy

Successfully managing health and safety in the workplace relies on commitment, consultation and co-operation. Everyone in the workplace needs to understand the need for health and safety, what their role is in making the workplace safer, and how they can fulfill their responsibilities and duties

### Policy

WA Sweeping and Scrubbing allocates the following responsibilities:

Employer – Officer (Board Member, Managing Director or other):

- Approval of OHS documentation
- Communication of OHS policies and objectives
- OHS Leadership
- Allocating sufficient OHS resources
- Reviewing OHS performance
- Providing direction for increasing OHS performance
- Establishing and promoting a OHS culture
- Legal obligations to provide and maintain a safe workplace

Employer - Management:

- Integration of OHS into all decision making
- Consult with employees and other duty holders/contractors
- Plan, develop, implement, monitor and review OHS policies and programs
- Control risks
- Support OHS Committees
- Provide OHS Communication
- Discuss OHS at toolbox meetings
- Identify training needs and enable training as required
- Reporting and recording
- Liaise with relevant Regulatory Authorities
- Legal obligations to provide and maintain a safe workplace

All employees:

- Comply with OHS policies, procedures and programs
- Work in a manner that is safe and does not create risks to themselves or others
- Report and assist to rectify hazards
- Participate in consultative arrangements
- Legal obligations to not endanger others by their acts or omissions

OHS Committees:

- Develop, monitor and review OHS policies and procedures
- Monitor and report on OHS performance
- Monitor changes in legislation
- Review Corrective Actions
- Provide OHS information to employees.

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## 10.6 Occupational Health and Safety Policy

WA Sweeping and Scrubbing recognises its moral and legal responsibility to provide a safe and healthy work environment for employees (including contractors and employees of contractors), clients and visitors to site. This commitment extends to ensuring that operations do not place the local community at risk of injury, illness or property damage.

Our OHS objective is to actively work towards elimination of injuries and fatalities. Our target is to have an **(insert percentage) annual reduction** of all injuries and incidents.

### Responsibilities

Management are committed to:

- Integrating OHS into all aspects of WA Sweeping and Scrubbing operations
- Doing everything reasonably practicable to ensure the health, safety and welfare of its employees while they are at work
- Compliance with legislative requirements, current industry OHS standards and co-operation with Regulatory bodies, as far as is reasonably practicable
- Identifying any hazards in the workplace that may be a risk to health and safety and eliminating or controlling those hazards
- Exceeding legislative requirements and aiming for best practice systems of work
- Measurable targets to ensure continued improvement reflected in accountability/key performance indicators at all levels
- Provision and maintenance of a work environment that is safe and without risks to health
- Consultation with employees and other parties to improve decision-making on OHS and environmental matters
- Development, implementation and review of written safe work procedures
- Distribution and communication of safety information and safe work procedures
- Information, training and supervision to employees contractors, clients and visitors to ensure safety
- Support and assist employees in effective injury management and rehabilitation
- Review and assessment of OHS policies

Employees are expected to:

- Take reasonable care for the health and safety of themselves and others at work
- Co-operate with WA Sweeping and Scrubbing to enable compliance with OHS legal obligations
- Participate in consultative arrangements
- Assist management to meet OHS targets/key performance indicators
- Participate in return to work programs
- Comply with all reasonable instructions from managers in relation to health and safety issues at work
- Ensure that they know how to use equipment safely and that they use all equipment in a correct manner.

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## Section 11 Employee Policy Agreement

I \_\_\_\_\_ (Employee's name) have read the policies and procedures in the WA Sweeping and Scrubbing OHS Manual. After reading the OHS Manual I have had the opportunity to raise any questions or issues that required clarification with my employer. I confirm that I understand the policies and procedures in the OHS Manual and that I am aware that breaches of these policies will be subject to disciplinary action, including possible termination of employment.

Employee's Signature \_\_\_\_\_ Date \_\_\_\_\_

Witness' Name \_\_\_\_\_ Date \_\_\_\_\_

Witness' Signature \_\_\_\_\_

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## Section 12 Glossary

**Act** - A law (legislation) passed and enacted by a state or territory parliament, also commonly known as an Act of Parliament. Acts are the principal pieces of law covering, in this case, health and safety in the workplace.

**AS/NZS 4801** - The joint Australian and New Zealand standard for Occupational Health and Safety management systems – Specification with guidance for use, published by Standards Australia International Ltd and Standards New Zealand.

**Compliance Code (CC)** - A CC provides practical guidance to those who have duties under the OHS legislation. It shows how to comply with those duties or obligations. Relevant duty holders need to use the CC in conjunction with the OHS legislation. A CC is not mandatory, however, a relevant duty holder who complies with a relevant CC may be considered to have complied with their duties and obligations. If conditions or way work is done at the workplace raise different or additional risks not covered by a CC, compliance needs to be achieved by another means.

**Code of Practice (COP)** – These documents have the purpose of providing practical guidance to employers, self-employed persons and employees to assist them with achieving the standards of OHS required under OHS legislation. A COP does not have the same legal force as Regulations. Failure to observe a provision of an approved COP is not, in itself a breach of the OHS Act 2004.

**Contractor** - A contractor is a person (other than a WA Sweeping and Scrubbing employee) engaged to perform work for, or on behalf of WA Sweeping and Scrubbing. See **Employee**.

**Controlled document or record** - Any document for which distribution and status are to be kept current by the issuer to ensure that authorised holders or users have available the most up to date version.

**Corrective Action** - A corrective action is an action, which is taken to eliminate the cause of an identified compliance breach or a hazard.

**Dangerous Goods** - Dangerous Goods within the meaning of the Dangerous Goods Act 1985.

**Emergency service -**

- a. Country Fire Authority; or
- b. Metropolitan Fire and Emergency Services Board; or
- c. Metropolitan Ambulance Service; or
- d. Rural Ambulance Victoria; or
- e. Victoria State Emergency Service Authority; or
- f. Victoria Police.

**Employee** - A person employed under a contract of employment or contract of training. An employee includes any independent contractor engaged by an employer and any employees of the independent contractor

**Employer** - A person who employs one or more other persons under contracts of employment or contracts of training.

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

**Hazardous Substance** - means a substance that meets the criteria for classification as being hazardous according to the OHS Regulations 2007 (Part 1.1 Definitions). A **Substance** is any natural or artificial substance, whether in the form of a solid, liquid, gas or vapour.

**Hierarchy of Control** - A hierarchical structure of actions that can be used to control risk, listed in order of effectiveness.

**Incident** - An incident is any unplanned event resulting in, or having a potential to result in injury, ill health, damage or loss.

**Lost Time Injury (LTI)** - An injury or illness that occurs in the workplace as a result of an activity, or exposure to a hazard and results in at least one full day absence from work.

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**LTI Average Days Lost Rate** - The average days lost per LTI.

**LTI Incident Rate** - The rate of LTI injuries or illnesses expressed as per 100 employees

**Manifest** - A manifest is different from a Chemical Register. A manifest is a written summary of specific types of dangerous goods that are used, handled or stored at a workplace. Its purpose is to provide the emergency services organisations with detailed information they require and includes site plans and emergency contact details. A manifest must be prepared when the quantity of dangerous goods exceeds the quantities listed in the "Manifest Quantity" column in Schedule 2 of the OHS Regulations 2007.

**Material Safety Data Sheet (MSDS)** - A document containing important technical data and information regarding the chemical properties, hazards, risks, uses, storage, disposal, first aid and emergency requirements associated with a specific substance or material. The manufacturer, supplier or importer of the substance must provide a MSDS to the employees who work with that substance. MSDS must be current – within 5 years of the issue date and meet specific legislated format requirements.

**OHSAS 18001** - International audit tool system intended to audit OHS management systems and provide international OHS benchmarks.

**OHS Documents** - Include, but not limited to policies, procedures, guidelines, programs, agreements, forms, checklists, templates, risk assessments and safe work procedures.

**OHS Records** - Include, but not limited to audit reports, workplace inspections, risk assessments, safe work procedures, training plans and registers, OHS meeting minutes, emergency evacuation reports, health monitoring reports, document control registers, inspection testing and monitoring reports and corrective action registers.

**Placard** - A sign or notice that is displayed in a prominent place, next to a container or storage area for Dangerous Goods at a workplace. It contains information about the Dangerous Goods in containers or in a storage area. Placards are placed on trucks / vehicles transporting Dangerous Goods.

**Plant** includes -

- a. Any machinery, equipment, appliance, implement and tool; and
- b. Any component of any of those things; and
- c. Anything fitted, connected or related to any of those things.

**Regulations** - Regulations are law that is created under the authority of an Act. Regulations are subordinate to an Act and are the secondary level of law covering, in this case, health and safety in the workplace.

**Relevant OHS legislation** - means any one or combination of the following:

- a. Occupational Health and Safety Act 2004
- b. Occupational Health and Safety Regulations 2007
- c. Dangerous Goods Act 1985 or any regulations made under that Act
- d. Dangerous Goods Regulations (Explosives) 2011
- e. Dangerous Goods (Storage & Handling) Regulations 2012
- f. Equipment (Public Safety) Act 1994 or any regulations made under that Act.

**Risk** - Risk is a combination of the likelihood and consequences of any injury or harm occurring.

**Self-employed person** - means a person, other than an employer, who works for gain or reward otherwise than under a contract of employment or training.

**Volunteer** means a person who is acting on a voluntary basis (irrespective of whether the person receives out-of-pocket expenses).

**Workplace** – means a place, whether or not in a building or structure, where employees or self-employed persons work.

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|   |              | Signature                   |                           |
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## Section 13 References

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- Victorian State Government (2012): *Equipment (Public Safety) Act 1994*
- Victorian State Government (2012): *Equal Opportunity Act 2010*
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