

Seawolf Building Co. WHS Policy

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1. OVERVIEW

The Work Health and Safety (WHS) Management System is to apply to all sites and offices of Seawolf Building Co and any site under management by the company, along with any project involving its workers.

Failure to comply with the requirements of the WHS Management System will lead to disciplinary action.

The System uses ISO 45001:2018 as a framework to establish and maintain effective management of the WHS. It is also designed to provide compliance with all WHS legislative requirements and promote excellence in Work Health and Safety management through the Plan-Do-Check-Act approach to achieve continual improvement.

Seawolf Building Co has implemented a structured safety management system to achieve a consistently high standard of safety performance. In addition, it will serve to ensure Seawolf Building Co meets the obligations of its internal Work Health and Safety Policy and relevant Work Health and Safety legislation.

Seawolf Building Co will review this system regularly in order to provide guidance for internal/external consultation, development and improvement processes. More frequent reviews will take place in response to organisational and legislative changes.

Seawolf Building Co recognises that the success of the system depends on commitment from all levels and functions, particularly the leadership of management. Seawolf Building Co has defined a WHS Policy and Objectives, and plans to implement, monitor and evaluate its procedures which give effect to the WHS policy and objectives; and achieve conformance with such planned procedures.

The policy and procedures are formally authorised and approved by the Managing Director by signing the document.

The WHS Management System will be released as a controlled document and the controlling authority shall be the Managing Director.

This will be managed under the quality control system currently maintained by Seawolf Building Co.

The Managing Director has also been assigned custody to ensure the procedure is maintained and updated.

2. REFERENCES

Throughout this document we reference relevant legislation and standards as well as codes of practice, compliance codes and guidelines.

3. DEFINITIONS

Audit

A systematic examination against defined criteria to determine whether activities and related results conform to planned arrangements and whether these arrangements are implemented effectively to achieve the organisation's policy and objectives.

Confined Space

An enclosed or partially enclosed space that is at atmospheric pressure during occupancy and

- Is not intended or designed primarily as a place of work, and
- May have restricted means for entry and exit, and
- May have atmospheric contaminants or an unsafe oxygen level, and
- May cause engulfment due to (e.g. collapse, fumes, immersion, fire)

Consultation

Seeking views before making a decision.

Fatigue

The temporary inability, decrease in ability, or strong disinclination to respond to a situation because of previous over-activity, either mental, emotional or physical.

Hazard

A source or situations with potential for harm in terms of human injury or ill health, damage to property, damage to the environment, or a combination of these.

Hazard Assessment

The overall process of determining whether a hazard is significant.

Hazard Identification

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

Health Surveillance

Monitoring of individuals for the purpose of identifying changes in health status that may be due to occupational exposure to a hazard.

Incident

Any unplanned event resulting in, or having a potential for injury, ill health, damage or other loss.

Injury and/or ill health

Adverse effect on the physical, mental or cognitive condition of a person.

Notifiable Incident

The Work Health and Safety Act 2011, defines a notifiable incident as:

- The death of a person; or
- A serious injury or illness of a person; or
- A dangerous incident

Officer

An officer is a person who makes decisions, or participates in making decisions, that affect the whole or a substantial part of a business or undertaking or has the capacity to significantly affect the financial standing of the business or undertaking.

If a person is responsible only for implementing those decisions, they are not considered an officer.

Partners of a partnership are not officers but are PCBUs.

An officer of a PCBU must exercise due diligence to ensure that the PCBU complies with their duties under the WHS legislation.

You are considered to be an officer if you are - an officer within the meaning of section 9 of the Commonwealth Corporations Act 2001, an officer of the Crown or an officer of a public authority.

Opportunity

Opportunity to improve a process or environment that doesn't necessarily need to be a hazard or risk. This is simply encouraging the continual improvement of business operations eg survey.

Participation

Involvement in decision-making.

PCBU

Person Conducting Business or Undertaking

A PCBU conducts a business or undertaking alone or with others. The business or undertaking can operate for profit or not-for-profit. The definition of a PCBU focuses on the work arrangements and the relationships to carry out the work.

Although employers are PCBUs, the term PCBU is much broader than this and may include a corporation, an association, partners in a partnership, a sole trader, a volunteer organisation which employs any person to carry out work, householders where there is an employment relationship between the householder and the worker.

Policy

Intentions and direction of an organisation.

Procedure

Specified way to carry out an activity or process.

Risk Assessment

The overall process of estimating the magnitude of risk and deciding what actions will be taken.

Safety

A state in which the risk of harm (to persons) or damage, is limited to an acceptable level.

Stress

The awareness of not being able to cope with the demands of one's environment, when this realisation is of concern to the person, in that both are associated with negative emotional response.

Top Management

Person or group of people who directs and controls an organisation at the highest level.

Work Health and Safety Coordinator

The Work Health and Safety Coordinator is the person in the company that has been assigned the task of managing the WHSMS.

Work Health and Safety Management System (WHSMS)

That part of the overall management system which includes organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the WHS policy, and so managing the WHS risks associated with the business of the organisation.

Work Health and Safety Objectives

An overall WHS goal in terms of WHS performance, arising from the Work Health and Safety policy that an organisation sets itself to achieve, and which are quantified where practicable.

Work Health and Safety Performance

The measurable results of the WHSMS, related to the organisation's control of health and safety risks, based on its WHS policy, objectives and targets. Performance measurement includes measurement of WHS management activities and results.

Work Health and Safety Policy

A statement by the organisation of its commitment, intentions and principles in relation to its overall Work Health and Safety performance which provides a framework for action and for the setting of its Work Health and Safety objectives and targets.

Work Health and Safety Representative

The Work Health and Safety Representative is elected to represent workers in a 'work group' on health and safety matters. The work groups are established first through consultation and agreement between the business or employer (or other PCBU) and the relevant workers, then nominees are called, and an election is held.

Work Health and Safety Risk

The chance of an adverse health and safety outcome occurring. It is measured in terms of consequences and likelihood.

Work Health and Safety Target

A detailed performance requirement quantified where practicable and pertaining to the organisation, that arises from the health and safety objectives and that needs to be met in order to achieve those objectives.

Worker

You are considered to be a worker if you carry out work for a PCBU, such as - a worker, a contractor or sub-contractor, a worker of a contractor or sub-contractor, a worker of a labour hire company, an apprentice or trainee, a student gaining work experience, an outworker or a volunteer.

You can also be a PCBU and a worker if you carry out work for another PCBU.

4. OUR ORGANISATION

4.1. Organisational Context

Seawolf Building Co determines relevant internal and external issues that can affect the operations of the business and success of its Work Health and Safety Management System

Seawolf Building Co identifies, analyses, monitors and reviews factors that may affect the safety of our workers, as well as factors that may adversely affect our management system's integrity.

4.2. Workers and Interested Parties

Seawolf Building Co determines the needs and expectations of our interested parties and addresses them when planning and establishing its policies and procedures for the WHS Management System. Legal requirements and other requirements are included in these needs and expectations of interested parties. We also understand that the needs and expectations of our interested parties change and develop over time, which need to be incorporated during the continual improvement process.

4.3. The scope of the Work Health and Safety Management System

Based on the analysis of the issues and requirements identified in Sections 4.1 and 4.2, Seawolf Building Co has established the scope of our Work Health and Safety Management system in order to implement our objectives, policies and procedures that are relevant to our context, workers and any interested parties.

4.4. Work Health and Safety Management System

Seawolf Building Co has developed and implemented a structured health and safety management system to meet its obligations and legislative requirements. This will also assist to achieve a consistently high standard of safety performance. Regular review of WHS at top level reinforces its importance to Seawolf Building Co's commercial objectives and legal obligations.

To satisfy the requirements of ISO 45001:2018, Seawolf Building Co's Work Health and Safety Management System:

- Assigns responsibility to establish, implement, maintain and continually improve the WHS Management System
- Has procedures to ensure effective consultation and participation of workers
- Has procedures for hazard identification, and the assessment of risk and opportunities
- Encompasses current International and Australian Standards, professional guidelines and Government legislation.
- Ensures the provision of adequate resources to establish and maintain the WHS Management System.
- Evaluates the performance of the WHS Management System processes to ensure their effectiveness.
- Provides access for all employees to documented procedures; forms and any other work-related information pertaining to the work that they manage, perform, or verify.

5. LEADERSHIP AND WORKER PARTICIPATION

5.1. Leadership and commitment

Seawolf Building Co is able to demonstrate an active, consultative commitment to all areas of health and safety management in the workplace.

Seawolf Building Co has developed and implemented a structured health and safety management system to meet its obligations and legislative requirements. This will also assist to achieve a consistently high standard of safety performance. Regular review of WHS at senior level reinforces its importance to Seawolf Building Co's commercial objectives and legal obligations.

Policy Authorised by Top Management

The Managing Director will formally sign and date the current written policy and display it in the designated areas. The Managing Director will formally approve the policy and procedures.

The Managing Director reviews the documented Health and Safety Policy every year.

Policy Incorporates Management Commitment to Comply with Relevant Legislation

Seawolf Building Co's Health and Safety Policy will ensure compliance with legislative requirements and current industrial standards such as:

- The Statutory Health and Safety Acts.
- Various Codes of Practice.
- ISO 45001:2018 ~ Occupational Health and Safety Management Systems Requirements

Policy Includes Management Responsibilities

Seawolf Building Co has delegated general and specific health and safety responsibilities applicable to the various management levels of the organisation. The responsibilities are assigned to the levels of management as shown below and are based on the referenced legislative standards.

Further individual responsibilities are contained in particular procedures and position descriptions. Every level participates in the establishment and maintenance of the WHS controls as well as assisting in WHS planning.

Seawolf Building Co's WHS Policy is to inform workers and other interested parties that WHS is an integral part of its operations. All staff are actively involved in the review and continual improvement of WHS performance as this reinforces the company's objectives.

General Duties:

Managing Director and Executive Director

- Takes overall responsibility and accountability for the Health and Safety of the company.
- Formally approve the Work Health and Safety Policy.
- Assign custody and resources to ensure procedure is maintained and updated.
- Formally approve the Work Health and Safety Procedures.
- Review overall organisational health and safety performance.
- Participate where required in the resolution of safety issues.
- Review serious injuries/incidents and monitor corrective actions.
- Review health and safety performance of middle management.
- Ensure organisational compliance with health and safety legislation.

Supervisors

- Implement the WHS Policy, WHS Procedures and legislative requirements.
- Monitor health and safety performance within area of responsibility.
- Demonstrate commitment to health and safety through participation in formal and informal discussions, workplace visits and hazard inspections, etc.
- Participate, where required, in the resolution of safety issues.
- Investigate all injuries/incidents within area of responsibility.
- Ensure liaison with workers, particularly on any workplace changes which have a health and safety component.
- Initiate actions to improve health and safety within area of responsibility.
- Actively monitor the workplace to determine presence of hazards and take appropriate action to rectify any hazards found.
- Participate in consultation.
- Ensure all workers are inducted and receive regular training as required to perform jobs safely.
- Facilitate rehabilitation of injured workers.

Duty of Officers

If a person conducting a business or undertaking has a duty or obligation under the Act, an officer of the person conducting the business or undertaking must exercise due diligence to ensure that the person conducting the business or undertaking complies with that duty or obligation.

Duties of Workers and other persons at the workplace:

Workers

- Take reasonable care for his or her own health and safety; and
- Take reasonable care that his or her acts or omissions do not adversely affect the health and safety of other persons; and
- Comply, so far as the worker is reasonably able, with any reasonable instruction that is given by the person conducting the business or undertaking to allow the person to comply with this Act; and
- Co-operate with any reasonable policy or procedure of the person conducting the business or undertaking relating to health or safety at the workplace that has been notified to workers.

Other Persons at the workplace will:

- Take reasonable care for his or her own health and safety; and
- Take reasonable care that his or her acts or omissions do not adversely affect the health and safety of other persons; and
- Comply, so far as the person is reasonably able, with any reasonable instruction that is given by the person conducting the business or undertaking to allow the person conducting the business or undertaking to comply with this Act.

Reporting and Recording of Workplace Incidents, Injuries, hazards, risks and opportunities

Seawolf Building Co has procedures in place for internal and external reporting and recording of work-related incident, injury, hazards, risks and opportunities. Workers are encouraged to report all incidents, injuries, identified hazard, risks and opportunities, without any risk of reprisal.

Manager's Understand Health and Safety Management

Seawolf Building Co's management team are responsible for the development, promotion and implementation of WHS policies and procedures and therefore have a thorough understanding of the scope and structure of health and safety management. They are also responsible for communicating and training workers in all aspects of WHS management.

Various seminars, briefings, conferences and training sessions are attended as and when are necessary and available.

Management Support Early RTW of Injured Worker

Seawolf Building Co supports the early return to work (RTW) of injured workers provided this has been endorsed by a medical physician that the injured worker is capable of RTW. A RTW plan will be developed including suitable alternative duties, which will be identified after consultation with relevant parties and will be in writing. Appropriate assistance will be given to workers from a non-English speaking background and to those permanently unable to return to pre-injury duties.

5.2. Health and Safety Policy

The Work Health and Safety policy provides the direction and framework for establishing a Safe and Healthy workplace, as well as related objectives and targets. Top management ensures that our company policies are established and documented, and that the policies are available to all interested parties.

The Work Health and Safety policy is communicated to all employees at all levels throughout our organisation via induction, training and regular internal communications.

Work Health & Safety Policy

Commitment

Seawolf Building Co is committed to providing a safe and healthy workplace for all our workers. Seawolf Building Co further recognises its responsibilities to provide a safe and healthy work environment for subcontractors, clients, visitors and the public.

Scope

This policy covers all activities and persons working within any premises of Seawolf Building Co.

Objective

The objective of this policy is to ensure all workers are able to work in an environment which doesn't cause harm to them and where they contribute to continual improvement of work health and safety within the Seawolf Building Co business.

Policy

Seawolf Building Co provides, maintains and promotes a safe work environment and safety management system that is characterised by:

- A systematic approach to identifying, assessing and controlling health and safety hazards and risks through the development and implementation of suitable procedures
- Ensuring as far as practicable all operations conducted by workers are in accordance with relevant legislation and regulatory requirements and relevant industry standards
- Effective management demonstrated by commitment and direct involvement at all levels of the company
- Effective two-way communication as an integral part of every job
- The provision of appropriate facilities, equipment, education, training and supervision for workers to ensure healthy and safe working conditions and methods.

Responsibilities

Creating a safe work environment and care for the environment is the responsibility of all Seawolf Building Co's workers.

To achieve the stated policy objective, the commitment and contribution of each and every worker is required through:

- Taking responsibility for the health and safety of themselves and their fellow workmates
- Not compromising personal health and safety in the mistaken belief that other requirements are more important
- Considering health and safety as an integral part of their work.

Seawolf Building Group's Management are required to:

• Facilitate continual improvement through periodic review of objectives and performance measures, systems, practices and procedures to ensure their continued effectiveness and relevance.

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5.3. Organisational roles, responsibilities and authorities

Seawolf Building Co has delegated responsibilities within the organisation.

Responsibility and authority for management system roles is summarised below. Responsibility and authority for the day to day running of Seawolf Building Co are summarised on the Position Summaries with further details provided in the various Handbooks and Work Procedures as relevant.

Apart from specific responsibilities, all staff members are required to:

- Maintain a current knowledge of all management system matters relevant to their position and undertake any further training as identified by the relevant Manager.
- Carry out daily tasks according to management system documents.
- Complete and file records as specified by management system documents.
- Ensure that any documents used are the current version.
- Identify problems or potential problems and take appropriate corrective or preventive action.
- Contribute to the continual review and improvement of the management system.

Top Management

- Top Management will liaise closely with Project Managers / Supervisors, WHS Managers and Client Representatives to ensure all WHS matters / activities are being adhered to.
- Top Management has direct input at the WHS Management meetings which address all WHS topics.

Managers

Responsibility for the administration of the WHS system is part of this role, and Managers are required to:

- Ensure all staff members are adequately trained and aware of their responsibilities under the WHS system.
- Maintain and distribute WHS system documents.
- Co-ordinate the continual review of the WHS system.
- Report on the performance of the WHS system and recommend improvement.
- Plan and co-ordinate training.
- Schedule and appoint auditors to conduct internal audits.
- Hazard management practices.
- Environmental control practices and action plans.
- Maintain injury / incident register and statistics.
- Conduct formal injury / incident investigations.
- Chair WHS meetings and ensure consultation with non-managerial workers in WHS Matters.
- Co-ordinate workers compensation claims and rehabilitation programs in conjunction with external experts.

Project Managers / Supervisors

Project Managers / Supervisors have a key role in day-to-day compliance with the WHS system (which includes, but is not limited to, site specific requirements, JSAs, SWMS', Safe Work Procedures, Injury / Incident reporting, Personnel Protective Equipment, staff / subcontractors / service providers competencies / certification, Prestart and Toolbox meetings, Site Inspections and Site Management Plans).

Workers and Service Providers

Workers and Services Providers are required to:

- Follow safety and health instructions.
- Ensure their own safety and health at work
- Avoid adversely affecting the health or safety of any other persons through any act or omission at work
- Use and look after personal protective clothing and equipment.
- Report to the employer any hazards or situations, which might present a hazard.
- Report to the employer work related injuries, harm to health or the environment.
- Co-operate with employers on safety and health matters.

Workers' responsibilities for safety and health cover any issue over which they have control.

The basic principle is that you must take responsible care for your own safety and for the safety of others. You must not wilfully put at risk the safety and health of others.

5.4. Consultation and participation of workers

Seawolf Building Co has established a Consultation and Communication Procedure Appendix 10 which outlines the processes for consultation and participation of all workers and/or their representatives in WHS matters.

Seawolf Building Co will ensure that all workers have ongoing opportunities to be involved and to have their interests represented in the development, implementation, and evaluation of safe workplace practices.

Consultation is required when making decisions or changes that may affect the health or safety of workers

Forum for Consultation between Employer & Workers

Seawolf Building Co encourages workers to participate in discussions regarding safe work practices and WHS issues. A monthly communication meeting occurs where workers are encouraged to attend and discuss any incidents/injuries and hazard alerts. Seawolf Building Co has an open-door communication arrangement and encourages workers to discuss any concerns, WHS issues and offer any suggestions on WHS, work safe practices and injury management without any risk of reprisal. In addition, workers have the ability to contribute to decisions that may affect their health, safety and welfare at the workplace.

Worker Representatives and WHS Committees

Seawolf Building Co has recognised the importance of worker involvement in the process and consults with workers concerning the development, assessment of risks, identification of hazards, monitoring of performance and reviewing of objective targets against performance.

Seawolf Building Co has a commitment to providing open communication between workers and management which enables workers to:

- Elect a health and safety representative & workgroups
- Request the formation of a health and safety committee

6. PLANNING

6.1. Actions to address risks and opportunities

General

The overall aim of risk and opportunity management within Seawolf Building Co is to ensure that organisational capabilities and resources are employed in an efficient and effective manner to take advantage of opportunities and to mitigate risks. The company uses a Risk Based thinking approach to planning and implementing the WHSMS.

The scope of Seawolf Building Co's risk and opportunity management process includes the assessment of the internal and external issues identified in Sections 4.1, the assessment of the needs and expectations of any interested parties identified in Section 4.2, and the scope of the system as defined in Section 4.3.

In determining and addressing risks and opportunities, Seawolf Building Co will take into account:

- Hazards, risks and opportunities
- Legal requirements and other requirements
- The risks and opportunities related to the WHSMS that can influence the achievement of objectives.

Hazard identification and assessment of risks and opportunities

Hazard Identification

Hazard identification is the process of identifying all situations or events that could give rise to the potential for injury, illness or damage to plant or property.

Seawolf Building Co has a procedure that systematically identifies, assesses and manages the actual and potential hazards in the workplace over which Seawolf Building Co has authority or influence. Refer to Appendix Procedure 1 – Risk Management

- Potential hazards, which have been identified, should be notified to the immediate supervisor as per Appendix 3 Hazard Reporting Procedure.
- Hazard identification and risk assessment must accompany any proposal for the introduction of new equipment or processes or the modification of equipment or processes.

Seawolf Building Co has appointed trained and competent staff and they will receive ongoing training in hazard identification and management, risk assessment and control techniques.

Seawolf Building Co will identify hazards and assess risks for any new or modified equipment, material, process or services. The assessment will be conducted in consultation with relevant workers and reported to the Managing Director for further discussion or implementation.

Seawolf Building Co has a consultation mechanism where workers are involved in decisions affecting WHS. All workers are encouraged to participate in discussions, development, and the implementation of WHS issues.

All workers are encouraged to raise WHS issues with their Manager. Seawolf Building Co has an "open door" communication policy to encourage workers to discuss any concerns on WHS issues and to offer suggestions to their Manager/Supervisor.

Assessment of WHS risks and other risks to the WHS management system

The risk assessment process is defined in Appendix 2 - Risk Management Procedure and is relevant to the hazards associated with the activities of Seawolf Building Co. The risk assessment process will also consider risks to the work Health and Safety Management System, including external issues.

Assessment of WHS opportunities and other opportunities

Whilst assessing risks, the benefits and potential for improvement of Work Health and Safety performance of identified opportunities will be considered.

Determination of legal requirements and other requirements

To ensure Seawolf Building Co's work is completed in line with legislative requirements and other requirements at all times, a Legal and Other Requirements Register Appendix 4 has been developed detailing information pertaining to relevant State Legislation, Codes of Practice, Standards and other relevant requirements.

The Legal and Other Requirements Register will be consulted prior to completion of project management plans, work procedures and job safety analysis, and this will form the corner stone in adhering to legal and other requirements.

Seawolf Building Co receives regular updates via the WorkSafe, Environmental Protection Agency and Safety Institute of Australia websites and communicates changes as appropriate. All such changes are entered into the legal and other requirements register and updated into the WHS Management system.

All Managers are responsible for checking the validity of standards or regulations pertinent to their area of expertise and updating relevant personnel.

Planning action

Actions to address risks and opportunities, legal requirements and other requirements and emergency situations are integrated into the WHS Management system procedures.

The effectiveness of these actions is evaluated during the monitoring and measurement process.

6.2. WHS objectives and planning to achieve them

WHS Objectives

Seawolf Building Co has documented their health and safety objectives. An Objectives and Targets Procedure Appendix 5 has been implemented.

Seawolf Building Group will:

- Provide safe plant and systems of work
- Provide written procedures and instructions to ensure safe systems of work
- Ensure compliance with legislative requirements and current industry standards
- Provide information, instruction, training and supervision to workers and customers to ensure their safety
- Provide support and assistance to workers

Planning to achieve WHS objectives

When planning how to achieve its WHS Objectives, Seawolf Building Co will determine:

- What needs to be done
- What resources are required
- Who is responsible
- The timeframe to achieve the objective
- Monitoring and review

7. SUPPORT

7.1. Resources

Resources at Seawolf Building Group include human resources and specialised skills, infrastructure, technology, work environment and financial resources. The resource requirements for the implementation, management, control and continual improvement of the WHS management system, are defined in our procedures, work instructions and the following sections of this WHS manual.

7.2. Competence

Seawolf Building Co has established a Training and Qualifications Procedure Appendix 5 to identify the competency, training and licence requirements of its workers in relation to their Health and Safety.

Identification of Health and Safety Training Needs

Seawolf Building Co will undertake on-going assessment and record required training in the Training Register to ensure that every worker is provided with the appropriate training. Procedures are in place to ensure that workers have appropriate competencies, and these are kept up to date in tasks where hazards and risks have been identified. Training programmes are developed after completing an assessment of current capability against the required competency profile.

Seawolf Building Co documents and records training provided to establish and evaluate its effectiveness. The WHS competency standards include:

- Using industrial competency standards,
- Examining job descriptions, analysing work tasks,
- Analysing results of inspection and audits and review of incident reports.

Health and Safety Information and Training are Clearly Understood

All workers who are required to complete some form of recurring training, certification or assignment of responsibilities must be reminded through the training record database.

All in-house and external training is recorded and signed by workers who participated. The worker must demonstrate competency in the area of training. Qualified, experienced, and competent professionals must carry out all training.

The Manager ensures that recurring training and competencies are demonstrated by;

- Post training questionnaire
- Practical demonstration
- Verbal confirmation

Access to Staff with Skills, Experience and Qualification for Training

Seawolf Building Co ensures that its managers and workers are adequately trained, experienced and qualified with the relevant skills to undertake in-house training. Trainers are documented on the Training Attendance Register Form with their qualification, relevant skills, and experience.

WHS training for Workers actively involved in WHS Management

Seawolf Building Co has a procedure for identifying competencies, licences and training needs of all workers. Any workers, who are actively involved with WHS management but require further training, are entered into the Training Register. This information is used as a method of targeting future training requirements and maintaining legislative compliance.

Process to Determine External Trainers

External trainers are selected by demonstration of;

- Qualifications,
- Experience,
- Recommendation,
- Their competency to complete the training at the required standard.

Selection Criteria:

- Knowledge and understanding of our business.
- Provision of services that meet our training requirements.
- Understanding of our culture and meeting the special demands that this places on providers.
- Cost effective solutions that can be customised if necessary to our specific requirements.
- Meet legal requirements of contract obligations e.g. St John First Aid

7.3. Awareness

Seawolf Building Co will ensure that all workers are informed of their own responsibilities for health and safety in the workplace. Seawolf Building Co will ensure that workers have specific knowledge concerning the management of hazards to which they are exposed. This will be achieved through training in workplace procedures, environment, equipment and materials.

Health and Safety Induction Programme for New Workers

"First Day Induction" for new or transferred workers is to be provided by the Manager or Supervisor as per the Induction Procedure Appendix 6. The Induction is a verbal explanation, observation of the task in a safe working environment with supervision.

All items on the First Day Induction Checklist Form are to be explained to the worker and this includes: -

- Hazards associated with the job and appropriate controls
- Safe way to do the job
- Emergency procedures and equipment, facilities such as toilets, meal rooms and first aid kit
- Copy of health and safety policies and procedures
- The right for workers to remove themselves from work situations that they believe present a danger to themselves without undue consequence
- Explain safety signs, symbols and safety controls
- Safety equipment and how to use them
- Procedures and forms for reporting injury and near miss; etc.

The induction form is to be signed by both the new worker and the person providing the training (i.e. Manager or Supervisor) and held in the personnel file.

Health and Safety Documented Control System

Documentation of operation processes and procedures are defined and appropriately documented and updated as necessary. Seawolf Building Co has clearly defined the various types of documents, which establish and specify effective operation procedure and control.

Workers are trained as to when and why these procedures are required and to be competent in their use. Procedures are reviewed regularly as well as when changes to equipment, processes or material have occurred.

WHS documentation supports worker awareness of what is required to achieve the WHS objectives and enables the evaluation of the system and performance. The documentation, also known as the WHS manual, are current, comprehensive, and dated, to ensure it is the current version.

Access to the documentation is available to all workers. The document contains the name of the contact person with specific responsibilities to WHS issues.

Access to Health and Safety Information

WHS Manuals are available where Seawolf Building Co operations are performed and are easily accessed by all workers. Other safety information such as current WHS Legislation, Internet, and other WHS information are available to all personnel.

7.4. Communication

General

Seawolf Building Co has established and implemented procedures to ensure effective communication of WHS information to management, workers, and other interested parties.

Internal Communication

Seawolf Building Co is committed to consultation and co-operation between management and workers. The organisation will consult with workers by direct consultation and regular communication meetings and on any workplace change that will affect the health and safety of any workers.

Seawolf Building Co's Consultation and Communication Procedure Appendix 8 outlines the communication process.

External Communication

The external communication requirements of WHS Information is written into Seawolf Building Co's WHS management system procedures.

7.5. Documented information

General

Seawolf Building Co's WHS Management system includes documented information as required by the ISO4 5001, any legal requirements, and other documented information the company determines as necessary for the effectiveness of the WHSMS.

Seawolf Building Co's Documentation and Data Control Procedure outlines the core elements, related documents, and defines how the WHS documentation will be documented and maintained.

This procedure is to ensure the latest version of all key documents are available to all relevant staff, and to ensure records are filled out and filed (electronically or hard copy as appropriate) in an effective and timely manner.

Creating and updating

Seawolf Building Co will ensure the latest version of all key documents is available to all interested parties, and to ensure records are filled out and filed (electronically or hard copy as appropriate) in an effective and timely manner

The WHS Manager is responsible for:

- Ensuring that any new documents required for the WHS Management System are developed and that the WHS Manual, and Policies and Procedures are approved at Management Meetings or other documents approved by the WHS Manager prior to inclusion in the manual.
- Ensuring the file name, which includes the latest review date are recorded in each document.
- Transferring the old version to the superseded folder where appropriate.
- Notifying all affected staff of the changes made, via change announcements.
- Responsible for ensuring a review of current documents is undertaken and the date of the file name be amended accordingly.

Control of documented information

Any printed copy of documents within the WHS Management System is an uncontrolled copy. To ensure that the latest version of any documents is used, please refer to electronic copies held.

Seawolf Building Co shall retain hardcopy and/or electronic records in relation to system procedures, job safety analysis, incidents/injuries, training records, corrective action and other documentation stated in this Manual.

Minimum retention times are:

- 7 years for project related records
- 6 years for accounting related records
- 3 years for administration records

Or the length of the warranty period if it is to exceed the above.

All staff members are responsible for:

- Completing and filing records as outlined in the WHS Manual.
- Disposing of records that are not confidential in the appropriate bin.
- Shredding all confidential records prior to disposal.

Management is responsible for:

- Ensuring records are retained in a systematic manner that ensures information is readily accessible when required.
- Ensuring job specific records are filed in a systematic manner and at the conclusion of each job, all records are archived.
- Ensuring all records are archived and retained for a suitable time being at least the minimum retention times as shown above or as required by law. Confidential records are to be destroyed using a shredder.

8. OPERATION

8.1. Operational planning and control

General

Seawolf Building Co has procedures in place to ensure the WHS Management system and planned actions are implemented and controlled.

Eliminating hazards and reducing WHS risks

- Once a potential hazard has been reported or changes proposed (opportunity for improvement),
 it shall be brought to the attention of the management team and the workers through the
 consultative process.
- The appropriate Manager will implement control measures where appropriate, based on the hierarchy of control as per the Risk Management Procedure Appendix 2.
- Hazard Controls will be developed and implemented as part of the risk control mechanism.
- The full assessment report will be tabled in a Communication Meeting within 1 week. The workers may recommend additional action.
- The management and workers should review the controls within 1 week of their introduction to ensure that they are appropriate and that additional hazards have not been introduced. The assessment team may recommend changes to controls where appropriate.
- The Manager implements any modifications to the controls.
- A full Hazard Control Report is tabled at the Communication Meeting.
- Review of controls is included in the regular hazard inspections of the area.

Appropriate Control for Significant Hazards

Hazard control is the process of implementing measures to reduce the risk associated with a hazard. Significant hazard control is the process of implementing measures to reduce the risk associated with significant hazard. The control process must follow the control hierarchy, in order, as prescribed in health and safety legislation. It is always important that any control measures do not introduce new hazards, and that ongoing effectiveness of the control is monitored.

The Hierarchy of Control is:

- 1 ELIMINATION: Remove the hazard completely.
- 2 ISOLATION: Separate people from the hazard (guards, barriers, enclosure etc).
- 3 ENGINEERING: Engineering controls (earth leakage device, mechanical lifters etc).
- 4 ADMINISTRATION: Change of work practices (training, SWMS, procedures etc).
- 5 PPE: Personal protective equipment (hearing protection, eye protection, gloves etc).

<u>Note</u>: Provision of protective equipment should always be the *last* control option considered. A combination of controls may be appropriate however the combination must be based on the control hierarchy (i.e. must consider using category 1 before relying on 5).

Management of change

Seawolf Building Co's procedures include processes to control changes in the workplace that impact on the Work Health and Safety of our workers, subcontractors, visitors and all interested parties.

This includes changes in facilities, workplaces, equipment, plant, technology, knowledge and processes, as well as legal requirements and other requirements.

Outsourcing

The potential impact any outsourced processes may have on the WHS of Seawolf Building Co is determined and suppliers of outsourced processes are evaluated and selected on the following:

- Their ability to meet Seawolf Building Co's quality and safety requirements.
- The compliance of the process relative to industry and national standards.
- Past performance of the supplier with respect to safety.

<u>Procurement</u>

Seawolf Building Co will identify hazards and assess risks for any new or modified equipment, material, process or services. The assessment will be conducted in consultation with relevant workers and reported to the Managing Director for further discussion or implementation.

Seawolf Building Co will ensure that as far as practicable, potential WHS hazards associated with new facilities, workplaces, equipment, plant or processes are eliminated before their introduction into the workplace as per Appendix Procurement and Design.

Contractors

Seawolf Building Co has developed a process to identify hazards and control the risks associated with contractors (if applicable).

8.2. Emergency Preparedness and response

Seawolf Building Co has developed an effective general emergency plan as per the Emergency Procedures Appendix 15, to manage emergencies and comply with the legislative requirements. Seawolf Building Co also provides first aid facilities as per the First Aid Procedure Appendix 15.

Emergency Procedures are implemented and Communicated to Workers

All new workers are advised of the emergency procedures during their first day induction. In addition, emergency information is displayed around the workplace that includes emergency diagrams showing exit points, fire extinguishers, hose reels and muster points.

Designated Wardens Trained for each Work Area to take Control in an Emergency

Seawolf Building Co has appointed trained emergency control personnel to take control of emergency procedures in time of an emergency.

Annual Testing of Emergency Procedures.

Emergency evacuations and tests of procedures are conducted annually, and emergency equipment provided for emergency procedures are checked monthly as part of the monthly workplace inspection.

Consultative Review of Emergency Response Procedures after Practice Drills and Actual Emergency Event

- All risks will be continually monitored in order to minimise the potential of an emergency
- The safety of personnel is foremost
- Emergency plans will be formulated and reviewed in consultation with personnel, emergency service specialists and in line with statutory requirements
- Plans should be simple but effective
- Emergency control personnel will be trained in their appointed duties
- All personnel will be regularly trained in appropriate response procedures
- Minutes of worker involvement are available.

9. PERFORMANCE EVALUATION

9.1. Monitoring, measurement, analysis and performance evaluation

General

Seawolf Building Co reviews its health and safety system annually to gather material to help develop an improvement plan. This includes:

- Identifying the effectiveness of systems and practices currently in place.
- Establishing baselines against which future progress can be measured.
- Quantifying costs related to workplace illness and injury.
- Identifying hazards and injury factors.

More frequent reviews will take place in response to organisational and legislative changes. Management will undertake the reviews in consultation with staff.

The WHS Management system is reviewed following:

- Critical event (Notifiable Incident).
- Change in work procedures.
- Change in policy including any applicable legislation changes.

The review can occur whenever the above is recognised by either management or worker.

Refer to Appendix Procedure 0 – Health and Safety Plan.

Seawolf Building Co will ensure system objectives are set and progress against these objectives is regularly reviewed. This includes ensuring corrective and preventive action taken results in an overall improvement to the management system. It is also to ensure that internal audits are carried out in a timely manner.

Evaluation of compliance

Compliance with relevant legislation and other requirements is evaluated as part of the audit program outlined in this Manual.

9.2. Internal Audit

General

Seawolf Building Co has an internal audit system to determine whether the system has been properly implemented and maintained and whether the organisation has met the performance objectives set within its WHS Policy.

Internal audit programme

The internal audit system uses AS4804 to ensure consistency of the audit process and its outcome. The audit frequency is annual and will be performed as per the Audit Procedure.

Audits are carried out by trained and competent auditors on a regular basis. Results of audits are reviewed at the following WHS meeting.

Top Management is responsible for:

- Appointing competent and trained auditors to conduct regular compliance reviews. As a minimum this will involve a 12-monthly review of the WHS System by the WHS Manager or qualified auditor, and regular reviews of randomly selected site(s) for each division depending on the scope of work in progress in line with the WHS Plan(s). Seawolf Building Group also invites client audits.
- Reviewing and minuting compliance review results and significant issues at the following WHS
 meeting to determine whether the WHS Management system should be changed and/or
 whether further corrective/preventive actions and/or extra audits are required, following input
 from all other Managers.
- Ensuring the required follow up (e.g. training, document upgrade, and change of practice) and circulation of results to the relevant staff is carried out in a timely manner.
- Verifying that corrective and preventative actions have eliminated the non-conformance and minimised the chance of recurrence.

The appointed auditor is responsible for:

- Carrying out reviews by comparing practice against the requirements of the relevant document(s) and recording results of the review.
- Addressing any issues that can be immediately resolved.
- Forwarding results to the WHS Manager and discussing corrective and preventive actions required and the need for any follow up.

All Managers are responsible for:

- Identifying and documenting suitable corrective and preventative actions allocating responsibilities and timescales following compliance reviews.
- Ensuring all actions have been closed out in line with agreed timescales.
- Regular spot-checking of compliance with documented systems.
- Providing training and support to all staff to ensure compliance.
- Regular meetings are also to be held as part of the Monitoring and Measurement process.

Managers are responsible for:

- Chairing regular Management WHS meetings, nominally monthly, to discuss all issues relevant to their area and to review the overall performance of the WHS Management system. Inputs to the meeting include the previous meeting minutes, injury/incident reports, audit results, training requirements, supplier & subcontractor performance, KPIs, communication, environmental issues, customer feedback, non-conformances and any other issues which may improve the overall WHS system.
- Recording and circulating an action set of minutes for each meeting detailing the status and responsibility for the agreed action(s). Regular communication to ensure that issues arising from these meetings are addressed nationally.
- The establishment of other teams to work on relevant company and system issues where applicable.
- Chairing regular WHS meetings, to discuss all issues relevant to their area using the same inputs as listed above.
- Recording and circulating an action set of minutes for each meeting detailing the status and responsibility for the agreed action(s).

9.3. Management Review

Seawolf Building Co reviews its health and safety system annually to gather material to help develop an improvement plan. This includes:

- Identifying the effectiveness of systems and practices currently in place.
- Establishing baselines against which future progress can be measured.
- Quantifying costs related to workplace illness and injury.
- Identifying hazards and injury factors.

More frequent reviews will take place in response to organisational and legislative changes. Management will undertake the reviews in consultation with staff.

The WHS Management system is reviewed following:

- Critical event (Notifiable Incident).
- Change in work procedures.
- Change in policy including any applicable legislation changes.

The review can occur whenever the above is recognised by either management or worker.

Refer to Appendix Procedure 0 – Health and Safety Plan

10. IMPROVEMENT

10.1. General

Through the performance evaluation process opportunities for improvement are determined and has procedures in place to action these opportunities.

10.2. Incident, nonconformity and corrective action

System for Reporting, Recording and Analysing Incidents, Injuries and Work-related Illness

Seawolf Building Co has an active reporting, recording, investigation and corrective action process. The terms of incidents and injuries in this context includes all "near miss" or "near hit" events, work-related illnesses and injury, events that harmed or might have harmed, any worker during the course of their work. Refer Injury/Incident Management Procedure Appendix 8.

- The *Injury/Incident Report Form* is to be completed by the worker or the immediate supervisor within 24 hours of the injury or incident.
- All injuries are to be reported.
- Incidents where a person could have been injured or equipment damaged must be reported.
- It is the responsibility of each supervisor to ensure the completed Injury/Incident Report is sent to the location indicated on the form within 24 hours of the time of the injury or incident.
- On receipt of an Injury/Incident Report, the Manager shall immediately arrange for an investigation to be commenced.
- For all injuries and incidents, an *Incident Investigation Form* is to be completed by the Manager (or person designated by the Manager) in conjunction with the worker involved.
- Training in the incident investigation process is provided to all workers.
- The report is to be completed within 24 hours of the incident and forwarded to the Manager.
- Each investigation should have attached to it a copy of the Injury/Incident Report. All Workcover or Workers compensation agent/insurer claims must have an incident investigation report completed.

Worker Specific Responsibilities to Report Incidents, Injuries and Work-related Illness

Workers are responsible for reporting all work-related injuries, illnesses, incidents where a person could have been injured, and equipment damage. The worker or immediate supervisor must complete Incident/injury Report within 2 hours of the injury or incident. It is the responsibility of the supervisor to ensure that the report is sent to the location indicated on the form within 24 hours of the time of the injury/incident.

Legislative Notification when a Notifiable Incident Occurs

Seawolf Building Co has a procedure to record in a register all injuries/incidents in the workplace. If the incident is a notifiable incident (see below), then Seawolf Building Co has a procedure to notify the Statutory Authority in accordance with their reporting requirements.

A written notice in the required form is to be provided to the Statutory Authority within the specified time frame, or as soon as possible after Seawolf Building Co is aware of the injury/incident.

Notifiable incidents:

There are three types of notifiable incidents, relating to:

- 1. The death of a person
- 2. A serious injury or illness of a person
- 3. A dangerous incident.

Serious injury or illness:

It means an injury or illness requiring the person to have:

- a) Immediate treatment as an in-patient in a hospital; or
- b) Immediate treatment for:
 - The amputation of any part of their body
 - A serious head injury
 - A serious eye injury
 - A serious burn
 - The separation of their skin from underlying tissue (such as degloving or scalping)
 - A spinal injury
 - The loss of a bodily function
 - Serious lacerations; or
- c) Medical treatment within 48 hours of exposure to a substance.

It is important to note that the treatment under (b) and (c) does not have to be as an in-patient in a hospital.

Dangerous incident:

The Work Health and Safety Act 2011 defines a 'dangerous incident' as a workplace incident that exposes a worker (or any other person) to a serious risk to their health or safety, emanating from an immediate or imminent exposure to:

- An uncontrolled escape, spillage or leakage of a substance, or
- An uncontrolled implosion, explosion or fire, or
- An uncontrolled escape of gas or steam, or
- An uncontrolled escape of a pressurised substance, or
- Electric shock, or
- The fall or release from a height of any plant, substance or thing; or
- The collapse, overturning, failure or malfunction of or damage to any plant that must be authorised for use, or
- The collapse/partial collapse of a structure, or
- The collapse or failure of an excavation or of any shoring supporting an excavation; or
- The inrush of water, mud or gas in workings, an underground excavation or tunnel, or
- The interruption of the main system of ventilation in an underground excavation or tunnel.

Procedure to Investigate Injuries, Incidents that Harmed or might Harm Workers

The investigation of injuries/incidents provides an opportunity to examine many aspects of our operations. The key of the investigation is to identify control measures that will prevent a recurrence of the same incident/injury. The focus is to identify the deficiencies in the system and to make changes if necessary to prevent a recurrence.

The procedure starts with an investigating team nominated to conduct the investigation. Depending on the seriousness or the complexity of the incident, a member of top management, and a person with technical knowledge of the work and a WHS professional will be included in the team.

The main stages of the investigation are: -

- Gather objective information and establish facts;
- Collect data that relates to environment and the human factors;
- Isolate the contributing factors;
- Determine corrective and preventative actions;
- Prepare a report (contain a proposed action plan for management consideration and implementation).

Procedure for Corrective Action to any Deficiencies Identified during an Investigation

Seawolf Building Co's management will evaluate the action plan proposed by the investigating team before taking preventative and corrective action. Seawolf Building Co then either implements the corrective action provided by the investigating team or develops a system that will address the deficiency with the current system and prevents any future recurrence.

The new system will comply with the designated standards and WHS legislative requirements, and after implementation, will have an evaluation procedure to ensure its effectiveness.

On completion of the investigation, top management will be provided with a copy of the report to ensure that any recommendation has been actioned.

Review Injury and Incident Data to Identify Trends and Provide Injury Prevention Initiative

Seawolf Building Co regularly utilises the data from the *incident register* to identify injury/incident gaps, trends and areas of opportunity for improvement. This will include developing corrective strategies, verifying the effectiveness of preventative or corrective actions and the development of objectives and targets for further improvements.

Non-Conformance

The objective of this procedure is to ensure problems, potential problems and opportunities for improvement are documented, analysed, resolved and submitted to the Manager for closing out and verification.

All workers are responsible for:

- Identifying potential problems before they arise (e.g. using JSAs, SWMS etc.), and taking appropriate preventative action or communicating the issue to their supervisor / manager.
- Providing feedback to their manager of any issue or situation they believe should be reviewed.

Managers / Supervisors are responsible for:

- Anticipating potential problems before they arise (e.g. using Job Safety Analysis (JSAs, SWMS etc.) and taking appropriate preventative action.
- Ensuring all incidents / injuries are reported in line with the procedure.
- Ensuring any problems encountered on site are recorded and the root cause analysed, noting down agreed corrective and preventative action. By utilising the site diary, Prestart / toolbox / WHS meeting minutes, and emails.
- Generating a Non-Conformance Report (utilise the *Hazard & Opportunity Report Form*) and forwarding it to the WHS Manager immediately as detailed below: -
 - 1. In the case of quality-related non-conformance that cannot be resolved onsite.
 - 2. Where a non-conformance has been identified by a client / external audit.
 - 3. Where a non-conformance report has been generated following a compliance review.
- Taking appropriate action to identify the root cause and implement control measures to prevent future occurrence.

The Manager is responsible for:

- Ensuring the agreed corrective and preventative action is incorporated and verified through the internal audit process.
- Capturing all non-conformances raised through compliance reviews, incident injury reports, and non-conformance reports for submission and final resolution at the WHS meeting.
- Monitoring issues arising from toolbox meeting minutes, safety and environmental observations, and emails that cannot be resolved onsite.
- Verifying that corrective and preventative actions have eliminated the non-conformance and minimised the chance of recurrence within the required timescales.

10.3. Continual Improvement

Seawolf Building Co WHS process is subject to regular reviews when factors likely to affect the degree of risks from hazards or the context such as changes in the organisation, materials, work procedures, work location, processes or methods occur. There are legislative requirements related to the type or frequency of monitoring and review activities such as safety inspections and audits.

As time proceeds new information comes to light in terms of risk and therefore the WHS assessment needs to be repeated regularly. Repeating the assessment process with rigorous acceptability criteria also promotes continual improvement in managing WHS.

11. COVID-19 IN THE WORKPLACE

Commitment:

Seawolf Building Co is committed to providing a safe and healthy workplace for all our workers, contractors and visitors therefore the following mandatory steps are implemented.

Scope:

This policy covers all activities and persons working within any premises of Seawolf Building Co, or has interactions with.

Procedure:

- 1. All Seawolf Building Co staff have been issued with a copy of this policy statement.
- 2. All employees are required to confirm that they have not been in contact with anyone who has tested positive for covid-19 or been in a deemed hotspot. If they have, they are to be isolated and obtain a clearance before returning to work.
- 3. If required to wear a mask it must be worn at all times when outside in public places. Ensure that after touching your mask to dispose or replace and that hands are washed immediately.
- 4. Hand sanitiser is to be used at all times and ensure appropriate hand washing on a regular basis.
- 5. If an employee begins to feel symptoms of a cold or flu they are to remain home and are to obtain a clearance prior to returning to work.
- 6. If employees are to isolate due to possible exposure, they are permitted to continue duties from home 'work from home' if able to.
- 7. Social distancing of 1.5m to be implemented including workstation locations and meeting
- 8. If a positive case or pandemic impacts the workplace the Pandemic Plan is to be utilised to ensure business operations run efficiently.

Pandemic Plan

The table below lists the critical operational functions and elements of the organisation and how the organisation will manage during the pandemic period or if the workplace is required to close due to an outbreak.

Operational Element	What support systems/groups are critical to these business functions?	What is being done to ensure this critical function will be maintained?	Impact to operations	Supplier Impacts	Who is monitoring effectiveness and communicating to Clients
IT Functions	IT Consultant	Work Remotely	Minimal	Minimal	Managing Director – no Client impact
Human Resources/Payroll	HR Manager	Work Remotely	Minimal	Minimal	Managing Director – no Client impact
Trades	Builder, Labourers, Tradesman	Will need to stand down	Impacting	Impacting as materials may be unavailable	Managing Director to liase with Clients

APPENDIX:

Procedures

Health and Safety Plan

Purpose

To identify the objectives, actions and responsibility of the Work Health and Safety program.

Procedure

- 1. Seawolf Building Group will ensure the WHS program is reviewed on an annual basis.
- 2. The health and safety checklist is to be completed by the WHS Representative/WHS Coordinator in consultation with relevant workers.
- 3. Using the checklist, the plan is then completed in conjunction with the Managing Director.
- 4. The health and safety plan is to be communicated to all workers.

Audit Records

Health and Safety Review Checklist - Form 0.1 Health and Safety Plan - Form 0.2

Form 0.1 Health and Safety Review Checklist

HEALTH AND SAFETY REVIEW CHECKLIST							
	YES	NO					
POLICY							
Reviewed yearly							
Have the objectives changed							
Are workers involved with the review							
Have audits been conducted yearly							
HAZARD / OPPORTUNITY IDENTIFICATION							
Hazard & opportunity identification complete							
Reviews undertaken when required (timetable)							
Responsibilities signed off							
Controls developed and implemented							
Monitoring (personal and environmental) undertaken							
PPE available and used							
Hazard training recorded							
TRAINING							
Induction training completed for new workers							
Training completed as scheduled							
Evidence that competency achieved							
Information available to staff							
INCIDENTS							
All incidents recorded							
Investigations completed							
Recommendations for improvements implemented							
Incidents collated and reported to management							
WORKER PARTICIPATION							
Meeting minutes maintained							
Recommended for improvements implemented							
EMERGENCY PLANNING							
Evacuation drill held every 6 months							
Drill records maintained							
Training sessions are recorded							
PLANT EQUIPMENT							
Maintenance records kept							
Comments:							
CICNED AND DATED							
SIGNED AND DATED							
Sign:	Date: /	1					
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Form 0.2 Health and Safety Plan

OBJECTIVE	ACTION	RESPONSIBILITY	DATE COMMENCE	DATE COMPLETE	REVIEW DATE	ACTION COMPLETE
Adopt and review the WHSMS, Health & Safety Policy and associated Manual	Review policy, date, and sign. Display policy	Managing Director				
Provide Safe Plant & Equipment	Ensure that Plant and Equipment is maintained and serviced	Managing Director				
Encourage consultation with Workers on health and safety matters	To discuss safety issues with Workers	Managing Director				
Consider hazards and any opportunities in the workplace and implement controls where required	Conduct a yearly workplace inspection to identify hazards	Managing Director				
Ensure Workers are properly trained and records kept	Ensure Workers are trained and qualified	Managing Director				
Record and Investigate incidences	Complete incident report form and investigation form	Workers				

1. Risk Management

Objective:

To have a system that systematically identifies, assesses and manages the actual and potential hazards and risks in the workplace over which the employer has authority or influence.

Methods to Identify Hazards

Managing hazards involves:

- A. Identifying hazards
- B. Assessing and prioritising hazards
- C. Developing and implementing actions to control them.

A. Identifying Hazards

Hazards can be created by:

- Culture the importance placed by all personnel by working in a safe manner
- Work organisation such as workload, work hours
- People management training, information, supervision
- Equipment hand tools, lifting heavy objects
- Environment energy sources, temperature
- Activity How the work is actually done

A variety of methods are used to identify hazards including:

- Injury analysis
- Task and process analysis
- Regular hazard audits and physical inspections
- Equipment checks
- Maintenance checks

To ensure all possible hazards are identified the following techniques are adopted:

i. Physical

Identified by type and may include:

- Chemical;
- Noise;
- Radiation (including the effects of the sun);
- Electrical;
- Lighting;
- Vibration;
- Temperature;
- Biological;
- Environmental;
- Ergonomic;
- Tools/equipment;
- Machinery;
- Potential hazard from neighbouring properties.

ii. Area

- Establish a plan of activities on the site;
- Divide into areas;
- List activities in each area;
- Identify hazards from each activity.

iii. Work Analysis

- Identify hazards of the work processes involved;
- Identify all tasks carried out;
- Establish steps or stages required to carry out tasks;
- Establish a flow chart that details each step of the work activity;
- Identify hazards in each step or stage;
- Consult;
- Staff;
- Records of incident;
- Reports;
- Summarise the information collected.

B. Assessing and Prioritising Hazards

i. Assessing

Using one or all of the above techniques establish a hazard list using the Risk Assessment Form.

ii. Prioritising

Having listed the hazards, they are listed in order of priority. To establish the priority a risk assessment is completed using the Risk Assessment Matrix

The purpose of risk assessment is to:

- Consider the chance of harm actually occurring and the possible consequences.
- Enable preventative measures to be planned, introduced and monitored to make sure the risks are adequately controlled.
- Ensure the legal requirements are complied with in respect of identifying and controlling significant hazards.

To be effective, risk assessment must:

- Be sufficient to guide the judgement on measures to take to comply with legal obligations.
- Cover all risks to the health and safety of people who may be affected in the workplace.
- Be regularly reviewed to ensure any changes to risks are recorded and managed.

For each hazard, decide as to whether injury or illness could result, if so, then implement the hierarchy of control to eliminate, isolate or minimise.

The following steps are taken:

- Select the area or task to be assessed.
- Identify the hazards.
- Identify whether any injury, illness, or damage could result.
- Conduct risk assessment.

- List most serious first.
- Implement control plan.

C. Developing and Implementing Controls

Having identified the hazard, steps must be taken to manage it following the hierarchy of control below:

Elimination

- Replacement with a less hazardous material/item.
- Safe design.
- Policies and procedures.

Engineering

Design and install equipment to counteract the hazard / use barrier to shield the hazard.

Administrative & Personal Protection Equipment

- Provide protective clothing and equipment.
- Train use of protective clothing.
- Monitor use.
- Monitor workers health.

For each identified hazard the controls are listed on the Risk Assessment Form.

The list of identified hazards, Hazard & Opportunity Report Form, risk assessments and SWP/SWMS's (if required) forms the hazard register.

Safe Work Method Statements (SWMS)

Safe Work Method Statements (SWMS) can be used to identify the hazards associated with each step of a particular task and to specify the measures for controlling the risks associated with the hazards.

The Safe Work Method Statement (SWMS) form can be used to list the safety and administrative requirements of a task including permits required, working environment and associated hazards, PPE, tools and equipment and emergency requirements. It is also used to breakdown a particular task into basic steps, identify the potential hazards associated with those steps and to select, list and apply appropriate hierarchical control methods to control the identified hazards.

Where necessary and appropriate specialist advice is obtained for hazardous substances, i.e.

- Safety Data Sheets.
- State based Government Safety Authority i.e. WHS Qld, Workcover, Worksafe.
- Consulting Occupational Hygienists.

The identified hazards are reviewed:

- Annually.
- After a critical event.

The frequency depends on whether the hazard identified is significant or the injury trends indicate action should be taken.

Audit Records

Hazard Identification Register Form 1.1 Risk Assessment Form 1.2 Hazard Report**Error! Reference source not found.** SWP Form 1.4 SWMS's Form 1.3

Form 1.1 Hazard/Risk Identification Register

Date	Hazard Report Number	Location & Description of Hazard	Risk Rating	Risk Assessment/ SWP Number	Risk Controls Implemented By	Date Completed
					_	

Form 1.2 Risk Assessment Form

Worksite:									
Assessment No:	Assessr	nent Date:/		Review Date://					
What is being assessed? Describe the item, task, process, work arrangement:									
Sten 1 - Form a team of assess	ors Deci	de who else should be consulted.							
Assessor(s):	sors. Deci	de wild else silould be collsuited.							
	health an	d safety representative, other personr	nel expos	ed to risks)					
Step 2 - Identify the hazards a	ssociated	with the thing or situation being asses	sed						
Hazards: Potential to cause ha	rm to pe	ople, property or the environment. Ticl	k the app	licable hazards					
General Work Environment		Health and Security		Plant and equipment					
Restricted access or egress		Food		Vehicles					
Confined spaces		Poisoning or contamination		Mobile and fixed plant					
Air-conditioning (thermal comfort)		Intoxication		Powered equipment					
Air quality		Dehydration		Non-powered equipment					
Lighting		Violence		Elevated Work Platforms					
Noise (discomfort)		Working alone or in isolation		Pressure vessel					
Outdoors (sun exposure)		Working in remote areas		Laser (Class 2 or above)					
Uneven walking surfaces		Bites / Stings		Traffic control					
Working at height			_	Electrical					
Crowds/Public		Chemical		Vibration					
		Hazardous chemicals		Moving parts					
Ergonomic/manual handling		Explosives		Acoustic / Noise					
Workstation set up	П	Engineered nanomaterials							
Poor posture		Gas cylinders		Temperature / Weather effects					
Lifting / Carrying				Heat					
Pushing / Pulling		Radiation		Cold					
Reaching/overstretching		lonising radiation		Rain / Flood					
Repetitive movement		Ultraviolet (UV) radiation		Wind					
Bending		Radiofrequency/microwave		In or on water					
Eye strain		Infrared radiation		Pressure (Diving / Altitude)					
				Lightning					
Work design and management		Biological		Smoke					
Fatigue		Microbiological							
Workload		Animal tissue / Fluids		OTHER					
Mental stress		Human tissue / Fluids							
Organisational change		Allergenic							
Work violence or bullying		Other Biological							
Inexperienced or new personnel									

List the hazards identified	fron	n above							
1.				6.					
2.				7.					
3.				8.					
4.				9.					
5.				10.					
Any specific circumstances (describe):									
Persons at risk (list):									
Any relevant regulation, co	de,	standard or guid	deline (list):						
Step 3 – Risk Assessment		For each ident	ified hazard rate	the ris	sk using the Risk Ra	ating Matri	ix.		
Step 4 – Risk controls		Detail controls	measures requi	red to	address the risks a	pplying th	e Hierarchy of Controls		
 Elimination (is it r Substitution 	2. Substitution 5. Personal Protective Equipment (PPE) (eg gloves,								
Identified Hazards Exposure	.	Risk ass Consequences	sessment Likelihood		Risk Rating	Require Control	i Residual RISK Score		
		·							
	Г	Adequately cont	rolled. No further a	action r	equired - Sign off for	rm as comp	leted.		
Is the risk? (Tick one)	Ē				vestigation required				
Step 5 – Implementation P	lan								
Control Option	IGIT		ources		Person(s) responsi	ble	Proposed implementation date		
Step 6 – Comments and er	dor	sements							
otep o commento una cr	<u></u>	30111011103							
Name:	<u> </u>								
Assessment Approval: (eg I am satisfied that the risks				ly cont	crolled and that res	sources re	quired will be provided.		
Name:			Signature:				Date:		
Position Title:									

Risk Assessment Matrix

Step 1 – Determine Consequence (Impact) (C)

Step 2 - Determine Probability (Likelihood) of Event Step 3 – Assess Risk Level (R) Determine the risk level by combining Occurring (P)

Consequence with Probability

	10	Consequence (Impact)	Table	
Impact band	н	lealth & Safety	Environment & Heritage	Reputation
Substantial (5)		Fatal Incident (Class 1)	Permanent widespread ecological damage	International negative media coverage. Loss of business from key sector.
Major (4)	Permanent Injury (Class 1)	Damage, which permanently alters a person's future (e.g. quadriplegia, paraplegia, amputation of a limb).	Heavy ecological damage, costly restoration	Sustained national negative media coverage. Loss of long term key client.
Moderate (3)	Lost Time Injury (Class 2)	Damage, which temporarily alters a person's future.	Major but recoverable ecological damage	Regional/short negative media coverage. Loss of Client / project.
Minor (2	Medical Treatment (Class 2)	Damage, which temporarily inconveniences a person	Limited but medium term damage	Local negative media coverage. Site or project problem
Negligible (1)	First Aid Treatment (Class 3)	Actual injury which requires no treatment or simple first aid	Short term damage	Brief local negative media coverage.

Probability (Likelihood) Table								
Probability band		Description						
Almost Certain (5)	The threat can be expected to occur 75% - 99%	Common / Frequent Occurrence	More than 1 event per month					
Likely (4)	The threat will quite commonly occur 50% - 75%	Is known to occur or "It has happened regularly"	More than 1 event per year					
Possible (3)	The threat may occur occasionally 25% - 50%	Could occur or "I've heard of it happening"	1 event per 1 to 10 years					
Unlikely (2)	The threat could infrequently occur 10% - 25%	Not likely to occur very often	1 event per 10 to 100 years					
Rare (1)	The threat may occur in exceptional circumstances 0% - 10%	- Conceivable but only in exceptional circumstances	Less than 1 event per 100 years					

	Risk		Conseq	juence (Impa	ct) lable		
	sessment Matrix	Negligible (1)	Minor Moderate (2) (3)		Major (4)	Substantial (5)	
	Almost Certain (5)	Moderate (5)	High (10)	Very High (15)	Extreme (20)	Extreme (25)	
(pooq	Likely (4)	Moderate (4)	High (8)	Very High (12)	Extreme (16)	Extreme (20)	
Probability (Likelihood)	Possible (3)	Low (3)	Moderate (6)	High (9)	Very High (12)	Very High (15)	
Probab	Unlikely Low (2)		Moderate (4)	Moderate (6)	High (8)	High (10)	
	Rare (1)	Low (1)	Low (2)	Low (3)	Moderate (4)	Moderate (5)	

Consequence:

Hierarchy of Controls

Highest Level of Control				Lowest Level of Control
Elimination	Substitution	Engineering	Administration	Personal Protective Equipment

Probability:

5 = Substantial

4 = Major 3 = Moderate

2 = Minor

1 = Negligible

1-6 Acceptable

5 = Almost Certain

4 = Likely

3 = Possible

2 = Unlikely

1 = Rare

7-10 Acceptable with Strict Control Measures or Short Duration 11-25 Unacceptable

Form 1.3 SWMS

ABN: 21 663 496 008

Address: Werri Beach, NSW

Seawolf Building Co Safe Work Method Statement (SWMS)

Project: Project No: SWMS No: Work Activity: All persons involved in the works must have the SWMS explained and COMMUNICATED to them prior to start of works. **SWMS DETAILS** Brief Description of Work Activity: Location: Date: Date to be Reviewed: Personnel Responsible for Monitoring this Activity: Codes of Practice / Standards Consulted: These must be complied with. Plant and Equipment Required for this Activity: Details of Maintenance Checks Required for this Activity:

Phone: 0433 603 045

Email: admin@seawolfbuilding.com.au

Materials Used:				
MSDS Required? (Yes / No)				
Personnel Qualifications Required for this Activi Relevant state certification for task has been undertaken or				
Specific Training Required for this Activity: All personnel to have completed a Site Induction. Must be t SWMS and have all relevant certification for this task.	rained in this			
Personnel consulted on development of SWMS:	Position		Industry Experience	
- Traine:	T COILION		madday Experience	
Person Responsible for Updating SWMS:		Signature:	Date:	

	Risk of falls from greater than 2 metres	Work on a telecommunications tower	Demolition of load-bearing structure
High Risk Work involves:	Likely to involve disturbing asbestos	Temporary load-bearing support structures	Work in confined spaces
	Work in or near shaft or trench with an excavated depth greater than 1.5m or a in tunnel	Use of Explosives	Work on or near pressurised gas pipes or mains
	Work on or near chemical, fuel or refrigerant lines	Work on or near energised electrical installations or services	Work in an area with contaminated or flammable atmosphere
	Work with tilt up or pre-cast concrete	Work on, in or adjacent to road, rail shipping or other major traffic corridor	Work in an area with movement of powered mobile plant
	Work in or areas with artificial extremes of temperature	Work in or near a drowning risk	Diving work
	Other [please specify]:		

Activity Break the job down into steps	Potential Safety and Environmental Hazards What can go wrong	Risk Rating		isk Rating Control Measures			sk Ra Afte Contro	r	Person Responsible To ensure management method applied	
	Ŭ	С	Р	R		С	Р	R		

SIGNOFF

We the undersigned, confirm that the SWMS nominated above has been explained and its contents are clearly understood and accepted. We also confirm that our required qualifications to undertake this activity are current. We also clearly understand the controls in this SWMS must be applied as documented; otherwise work is to cease immediately.

Name	Qualification Required for this Activity	Signature	Date	Time	High Risk Licence number & Expiry (if required)

Form 1.4 SWP

Description	of Work:										
SWP Numb	er:		Issue Date:	:			Revie	ew Date:			
Picture of E	Equipment/Task:				Potential Ha	ntial Hazards:					
Personal Pr	otective Equipme	ent (PPE) Req	uired (Check th	e box fo	or required PPE):						
Gloves	s Face M	Eye Totection	Wel	Welding Mask Appropr Footwe			Hearing Protection	Protective Clothing			
Safe Work	Procedure Check	list:									
Task (2. Operation3. Post-Operation	1. PRE-Operation: Task (e.g. Drawings, instructions, specifications etc.) is clearly understood. 2. Operation: Make sure good housekeeping practices are in place										
	and understood	this procedur	e:		-						
Date:	Name:					Signed:					

2. Hazard & Opportunity Reporting

Purpose

This procedure describes how hazards and opportunities are reported by workers. The Hazard & Opportunity Report Form applies to the reporting of any health and safety issues other than personal injury, (the *Injury/Incident Report Form* is to be used for this purpose) and opportunities for improvement. The procedure applies to all workers.

Definitions

Hazard - potential to cause injury or damage.

<u>Opportunity</u> – an improvement to a process or environment that doesn't necessarily mean it is a hazard/risk.

Procedure

- 1. Seawolf Building Group shall ensure that the *Hazard & Opportunity Report Form* is available to all workers in all work locations.
- 2. If there is an immediate risk of injury or illness a worker shall take action to make the area safe, ensuring their own safety is not jeopardised and immediately report the hazard to their supervisor.
- 3. Workers shall immediately report any hazard to their supervisor and complete the *Hazard & Opportunity Report Form*. The worker should keep a copy of the completed form.
- 4. The supervisor on receipt of the Hazard & Opportunity Report Form shall:
 - take action to remove the hazard if possible
 - take action to prevent workers being exposed to the hazard
 - clarify and understand the opportunity
 - forward the Hazard/Opportunity Report to the Manager immediately on receiving the report.
- 5. The Manager shall provide all Hazard/Opportunity Reports for tabling at the safety meeting and shall allow workers access to the Hazard/Opportunity Report file.
- **6.** Copies of Hazard/Opportunity Reports are to be filed at each location under "Hazard/Opportunity Reports".
- 7. The Manager will ensure that an explanation of this procedure is included in the induction for new workers (refer Appendix Procedure 3 Induction).
- **8.** The Hazard Reporting Procedure is to be explained in safety meetings every 6 months.

Audit Records

Hazard & Opportunity Report Record of Safety Meeting Minutes Form 7.1

Form 2.1 Hazard & Opportunity Report Form

Date:	Hazard Report Number:	
Reported By:	-	
Name:	Position:	
Reported To:		
Name:	Position:	
Site location:		
Subject:		
Opportunity Near Miss Work	place Hazard Hazard	ous Work Practice
Description of Hazard/Opportunity:		
What needs to be done?		
Signature:	Date:	
Copy given to:		
Manager:		(Signature)
Communication Meeting:		(Signature)

3. Induction

Purpose

To set out the arrangements for induction of new Workers, transferred Workers, Workers of Subcontractors, and visitors.

Definitions

Visitors: persons who are accompanied at all times on site by a worker of Seawolf Building Group.

Procedure

1. New and Transferred Workers

"First Day Induction" is to be provided by the Manager or Supervisor. All items on the *First Day Induction Checklist* are to be explained to the worker. A record of this induction is to be signed by the person providing the training and by the worker and held under "Induction Records" in the worker file.

2. Workers of Subcontractors

Subcontractor induction is to be provided by the Supervisor/Manager or company delegate. All items on the *Subcontractor Induction Checklist* are to be explained and the Record of Induction signed by both the person providing the induction and the subcontractor's worker. This record is to be filed by the Supervisor/Manager.

3. Visitors

Visitors will be shown the location of the facilities, emergency evacuation plan and pedestrian restricted zones.

Audit Records

First Day Induction Checklist Form 3.1 Subcontractor Induction Checklist Form 3.2 Schedule of Induction Training

Form 3.1 Employee First Day Induction Checklist

Name and Signature of Supervisor

Name:				Date of Induction:		
Perso	on Conducting Induction:			Site:		
	Please tick	Yes	No	Comments		
1.	Introduction					
2.	Organisational overview and site tour					
3.	Outline of site rules (provide copy)					
4.	Discuss WHS manual					
5.	Emergency Procedures					
6.	Incident Reporting					
7.	Hazard Reporting					
8.	First Aid					
9.	Use of PPE					
10.	Workplace Harassment					
11.	Copy Qualifications/Licences					
12.	Drug and Alcohol					
13.	Manual Handling					
14.	Fatigue Management					
This in	formation has been provided to me:					
	Name and Signature of Worker	,		Date		

Date

Form 3.2 Subcontractor Induction Checklist

Name and Signature of Supervisor

Name	e:			Date of Induction:	
Perso	on Conducting Induction:			Site:	
				_	
	Please tick	Yes	No	Comments	
1.	Introduction				
2.	Organisational overview and site tour				
3.	Outline of site rules (provide copy)				
4.	Discuss WHS manual				
5.	Emergency Procedures				
6.	Incident Reporting				
7.	Hazard Reporting				
8.	First Aid				
9.	Use of PPE				
10.	Security and Access Arrangements				
11.	Copy Qualifications/Licences				
his in	formation has been provided to me:				
	Name and Signature of Subcontractor			Date	

Date

4. Training and Qualifications

Purpose

To identify the competencies, training, and license requirements, for all workers of the organisation.

Procedure

- i. Seawolf Building Co will ensure that its workers are adequately trained to a level of competency sufficient to ensure their health and safety when at work.
- ii. Seawolf Building Co will undertake training / competency needs assessment of all workers prior to the commencement of work or alteration of task allocation. The assessment will be recorded on Skills/Competency Needs Assessment Form.
- iii. Where skill deficiencies are detected, appropriate training will be provided prior to commencement of work so workers can perform their designated duties safely.
- iv. Workers will be selected for specific tasks based on their level of skill and competency to undertake the work safely.
- v. Casual labour will be used only when the nominated worker(s) satisfies the level of competency required to undertake the task or when appropriate training can be provided prior to commencement of the work. Proof of the competency of casual labour must be detailed in the Skills / Competency Needs Assessment form.
- vi. Internal and external training will be recorded on the Training Attendance Register Form.
- vii. A record of all training will be kept on the Worker Competency, Licence and Training record, in the workers personnel file, and where required, also on the Company Training Register.

Audit Records

Skills/ Competency Needs Assessment Form 4.1 Worker Competency, Licence and Training Record Form 4.2 Training Attendance Register Form 4.3 Company Training Register Form 4.4

Form 4.1 Skills / Competency Needs Assessment

Location:	Date:
Supervisor:	

Worker Name	Skills, competencies and experience	Job requirements/ Works to be undertaken	Deficiencies in skills, qualifications and competencies	Additional training required
	Years experience			Completed: Yes / No Date completed: //
	Years experience			Completed: Yes / No Date completed: //
	Years experience			Completed: Yes / No Date completed:
	Years experience			Completed: Yes / No Date completed:
	Years experience			Completed: Yes / No Date completed:
	Years experience			Completed: Yes / No Date completed: //
	Years experience			Completed: Yes / No Date completed: //

Form 4.2 Worker Competency, Licence and Training Record

Name of Worker	•		
Supervisor:			

Competency	Licence or Certificate	Date Attained	Expiry Date	Course Name

Form 4.3 Training Attendance Record

Training Course:	 		
Trainer:			
Description of Course (or attach copy of			
training course)			
Trainers Signature:	 	Date:	
Attendees Name	Signature		Date

Form 4.4 Company Training Register

Worker Name	Position	Competency/Skills/ Course Name / Experience (eg: Tickets/qualifications)	Card No./ Reg. No.	Date Attained	Expiry Date

5. Injury/Incident Management

Purpose

This procedure describes the management of incidents, the internal and external incident reporting and recording requirements of the organisation, and the procedure for injury/incident investigation.

Definitions

Nil

Procedure

When an incident/injury occurs the first step is to provide first aid to any injured persons, both workers, and/or the public.

The next step is to ensure that the risk is controlled so that no more incidents or injuries can occur (Note: for notifiable incidents the incident site must not be disturbed as noted below).

System for reporting and recording all injuries, incidents and work-related illness:

Reporting incidents/injuries

The person involved in the incident completes the Injury/Incident Report Form and gives it to their Supervisor as soon as possible after the incident occurs or within 2 hours. It is the responsibility of the Supervisor to ensure this occurs. If the person involved in the incident cannot complete the form, then it is the supervisor's duty to complete the form and report the incident.

If the incident is a **notifiable incident**, then the PCBU must notify the statutory authority immediately after being made aware that a notifiable incident has occurred.

The incident site must not be disturbed until an inspector arrives unless it is:

- To assist an injured person
- To remove a deceased person
- Essential to make the site safe or to minimise the risk of a further notifiable incident
- Associated with a police investigation
- An action for which an inspector or the relevant states statutory authority has given permission a direction that a scene may be disturbed may be given in person or by a telephone call.

The PCBU must keep a record of each notifiable incident for at least five (5) years from the date notified to the relevant statutory authority.

Incident Registers

Incidences are to be recorded in an Incident Register managed by the WHS Coordinator. This register will assist in identifying trends and relevant statistics.

All incident and injury data is:

- Forwarded to WHS Representative/Managing Director
- Recorded
- Included in monthly reports

Incident/Injury Investigation

The incident is to be investigated by a competent person within 24 hours of incident occurring by using *Incident Investigation Form*. The findings are to be communicated to the Managing Director and relevant WHS Authority if required.

For Notifiable incidents, the investigation will take place when the inspector arrives. All workers of Seawolf Building Co will aid in the investigation where required by the inspector.

To ensure workers understand reporting responsibilities Seawolf Building Co will ensure that Injury/Incident Report Forms are available to all workers and incident reporting responsibilities are reiterated at:

- Staff meetings/toolbox talks
- During induction process

Audit Records

Injury/Incident Report Form 5.1 Incident Investigation Form 5.2 Training Registers Incident Register Form 5.3

Form 5.1 Injury/Incident Report

1. Site	9 Agency of incident:
	Machinery or (mainly) fixed plant
	Mobile plant or transport
	Powered equipment, tools or appliances
2. Specific Location	Non-powered hand tools, appliances and equipment
	Material or substance
	Environmental agency
Shop, shed, unit no, floor, building; Street no and name; Locality / suburb	Animal, human or biological agency (not bacteria or virus)
	Bacterial or virus
3 Personal data of injured person:	
Name	10 Body part:
Residential address	2 Head 2 Neck 2 Trunk
	Upper limb
	Systemic (internal organs)
Date of birth Sex (M/F)	, (
568 (11,17)	11 Nature of injury or disease: (specify all)
4 Occupation or job title of injured person:	Work hearing loss P Fatal
- Cocapation of job title of injured person.	2 Fracture of spine2 Puncture wound
	 Other fractures Poisoning and toxic effects
5 Period of employment of injured person:	DislocationMultiple injuries
2 1st week 2 1st month 2 1-6 months	Sprain or strain Damage to artificial aid
2 6 month-1year 2 1-5 years 2 Over 5 years	Head injury Disease, nervous system
Non-Worker	 Internal injury of trunk Disease, musculoskeletal
E NOT WORKE	Amputation, incl. Eye Disease, skin
6 Treatment of injury:	Open wound Disease, digestive system
NilFirst-aidDoctor (not hospitalised)	Superficial injury Disease, infectious or parasition
Hospitalised	Bruising or crushingDisease, respiratory system
2 Troopication	Poreign bodyDisease, circulatory system
7 Time and date of incident/injury:	Burns Tumour (malignant or benign)
Time am/pm	Nerves or spinal cordMental disorder
Date	12 Where and how did the incident/injury happen?
	If not enough room, attach separate sheet or sheets
Shift ② Day ② Afternoon ② Night	
Hours worked since arrival at work	
8 Mechanism of incident:	
Fall, trip or slip Hitting objects with part of the body	
Sound or pressureBeing hit by moving objects	
Body stressingHeat, radiation or energy	
Biological factorsChemicals or other substances	13 Has an investigation been carried out? yes/no
Mental stress	Was a significant hazard involved? yes/no
	- , ,
Completed by: Employer or employer's representative (delete which is not ap	oplicable)
Name and position	Signature Date

Form 5.2 Incident Investigation Form

Site:											
PARTICULARS OF II	PARTICULARS OF INCIDENT										
Date of incident:		Time:		Loca	tic	on:				Date repo	rted:
THE INJURED PERS	ON										
Name:						Address:					
Age: F	Phone nur	mber:									
Date of incident:						Length of emplo	yment:				
TYPE OF INJURY:		2 Bruising		?	Di	slocation	? Oth	ner (specify)		Injured pa	rt of body:
2 Strain/sprain	[? Scratch/ab	rasion	?	Int	ternal					
② Fracture		2 Amputatio	n	?	Fo	reign body	Remark	s:			
Laceration/cut		Burn scald		?	Ch	nemical reaction					
DAMAGED PROPER	RTY										
Property/ material dan	naged					Nature of d	amage				
						Ohi- at/aula	.+:fl:	- 4	_		
						Object/subs	stance inilio	cting damage	-		
THE INCIDENT											
Description											
Describe what happen	ed (space	overleaf for dia	agram - ess	sential	fc	or all vehicle incide	ents)				
Analysis											
What were the causes	of the inc	cident?									
HOW BAD COULD IT HA	Δ\/F REFN	12				WHAT IS TH	IE CHANCE	OF IT HAPPE	NING	AGAINI?	
Very serious		erious	? Min	or		② Often	il ci ii iivel	② Occas			ire
Prevention											
What action has or will	l be taken	to prevent a re	ecurrence?)	7	Tick items already	actioned			By whom	When
Use space overleaf if re	equired										
TREATMENT AND I	INVESTI	GATION OF I	NCIDENT	Γ							
Type of treatment give	n		Name of	persor	n g	giving first aid		Doctor/Hos	spital		
Incident investigated b	ıV.				- [Date: ()SH advise	L ∏YES) Dat	۵۰

Form 5.3 Incident Register

Date/Time of Incident	Site/Location	Name of Injured Person	Description of incident/injury	Investigation Completed

6. Return to Work

Introduction

The following procedure articulates Seawolf Building Co's commitment to preventing injury and illness by providing a safe and healthy working environment and providing opportunities for workers to participate in workplace rehabilitation to facilitate a timely and safe return to normal duties.

Workplace rehabilitation provides support to injured or ill workers, supervisors, managers and team members and is a positive strategy for retaining the job skills of staff members.

Definitions:

Injury - A personal injury which includes, for example, a cut, fracture, sprain, strain, disease, aggravation of a pre-existing condition, industrial deafness, and psychiatric or psychological disorders.

Injury Management/Return to Work plan - A plan that covers the management of a worker's injury and their return to work.

Suitable Duties/Suitable Employment - Matching pre-injury duties to recovering abilities on a temporary basis.

Approved workplace rehabilitation Provider/ Accredited vocational rehabilitation provider – offer specialized workplace rehabilitation services to help injured workers return to work.

Responsibilities

Employer Responsibilities:

- Prevent injury and illness by providing a safe and healthy working environment
- Notify the required authorities/insurers of the work injury within the required time frame
- Participate in the development of an injury management/return to work plan and ensure that injury management commences as soon as possible after a worker is injured
- Support the injured worker and ensure that early return to work is a normal expectation
- Provide suitable duties for an injured worker as soon as possible
- Ensure that injured workers (and anyone representing them) are aware of their rights and responsibilities including the right to choose their own doctor, and the responsibility to provide accurate information about the injury and its cause
- Consult with workers, doctors, rehabilitation providers, and, where applicable, unions to ensure that the return-to-work program operates as smoothly as possible
- Maintain the confidentiality of injured worker records
- An employer must not dismiss a worker as a result of a work-related injury within the time frame set out in that State/Territories legislation.

Workers Responsibilities:

- Take care to prevent work injuries to yourself and others
- Notify your employer of an injury as soon as possible
- Make a claim as soon as possible with the relevant authority/insurer
- Participate in developing and cooperate with your injury management/return to work plan
- Provide current medical certificates
- Provide accurate information about any aspect of your claim

- Notify the agent/insurer if you get a job or if you earn extra income from your job while you are receiving weekly benefits
- Attend medical and rehabilitation assessments
- Co-operate in workplace changes that will assist other injured workers.
- If a worker does not comply with the injury management plan, the agent/insurer may suspend benefits.

Workers' Rights:

- Nominate your own treating doctor who will be involved in your injury management plan
- If not provided by the insurer, choose your own approved workplace rehabilitation provider if necessary
- Be actively involved in the planning of your return to work.

Procedure

Notification of injuries

- Notify all injuries to the supervisor as soon as possible.
- Record all injuries using the Injury/Incident Report Form.
- Notify Workers compensation agent/insurer of all injuries within 48 hours.

Recovery

- Ensure that the injured worker receives appropriate first aid and/or medical treatment as soon as possible.
- Consult with the doctor nominated by the injured worker and who is responsible for the medical management of the injury and assist in planning return to work.

Return to work

- Arrange a suitable person to explain the return-to-work process to the injured worker.
- If not provided by the insurer, ensure that the injured worker is offered the assistance of an approved workplace rehabilitation provider if it becomes evident that they are not likely to resume their pre-injury duties, or cannot do so without changes to the workplace or work practices.
- Arrange for the worker's early return to work (subject to medical and rehabilitation provider advice).

Suitable duties

- Develop an individual return to work plan when the worker according to medical advice, is capable of returning to work, Suitable duties plan
- Provide suitable duties that are consistent with medical advice and that are meaningful, productive and appropriate for the injured worker's physical and psychological condition depending on the individual circumstances of the injured worker. Suitable duties may be:
 - 1. At the same worksite or a different worksite
 - 2. The same job with different hours or modified duties
 - 3. A different job
 - 4. Full time or part time.

Dispute Resolution

- Work together with the injured worker and where possible their union representative to resolve any disagreements about the return-to-work program or suitable duties
- If disagreements cannot be resolved between the worker and employer, involve other parties such as the worker's treating doctor, the agent/insurer, an approved workplace rehabilitation provider or an injury management consultant.
- If this does not satisfactorily resolve the issue, contact the relevant State/Territory authority for advice.

For more information on Workers Compensation/Return to work, see the relevant State/Territory websites/legislation below:

New South Wales

www.workcover.nsw.gov.au Workplace Injury Management and Workers Compensation Act 1998 Workers Compensation Regulation 2010

Queensland

www.workcoverqld.com.au www.worksafe.qld.gov.au Workers' Compensation and Rehabilitation Act 2003 Workers Compensation and Rehabilitation Regulations 2014

South Australia

www.rtwsa.com Return to Work Act 2014 Return to Work Regulations 2015

Northern Territory

www.worksafe.nt.gov.au Return to Work Act 2015 Return to Work Regulations 2015

Australian Capital Territory

www.worksafe.act.gov.au Workers Compensation Act 1951 Workers Compensation Regulation 2002

Western Australia

www.workcover.wa.gov.au Workers' Compensation and Injury Management Act 1981 Workers' Compensation and Injury Management Regulations 1982

Tasmania

www.worksafe.tas.gov.au Workers Rehabilitation and Compensation Act 1988 Workers Rehabilitation and Compensation Regulations 2011

Audit Records

Injury/Incident report Form 5.1 Injury Management plan Medical records Suitable Duties plan Form 6.1

Form 6.1 Suitable Duties Plan

Injured worker details			Plan details	Plan details		
Worker: Ph		Phone number:	Goal – long term	Goal – long term:		
Supervisor: Ph		Phone number:	Objective of this	Objective of this plan:		
Treating medical practitioner:		Phone number:	Duration of this	Duration of this plan from:		
Job description:			Fit for suitable duties (restricted return to work?)			
			<u> </u>			
Task details Week		Duties		Restrictions		
Week one commencing:						
Hours:	Days:					
Week two commencing:						
Hours:	Days:					
Treatment during this plan (e.g. physiotherapy):			Training required:			
			If 'yes' given by:			
Plan to be reviewed: at the end of each week by:			On:			
Signatures			N			
Name (treating medical practitioner):			Name (worker):			
I approve this plan				I have been consulted about the content of this plan and agree to participate		
Signature:		Date:	Signature:		Date:	
Name (supervisor)			Name (workplace rehabilitation provider)			
I agree to ensure this plan is implemented in the work area			I agree to monitor this plan			
Signature:		Date:	Signature:	Signature: Date:		

7. Consultation & Communication Procedure

Purpose

To establish a procedure for effective and regular consultations between management and workers, and ensure outcomes are communicated effectively.

Procedure

Meetings, Communications

Managers and WHS Administrators are responsible for:

- The election of Safety and Health Representatives in accordance with relevant State Legislation.
- Overseeing a Monthly WHS meeting to address quality, WHS and environmental issues.
- Ensuring toolbox meetings are conducted in line with the site / office WHS plan.
- Communicating any matters that are likely to affect the workplace via memo, company bulletin or similar.

The relevant manager / supervisor is responsible for:

- Conducting toolbox meetings in line with the agenda as detailed in the template to address relevant WHS issues.
- Ensuring all staff are consulted in regard to WHS procedural updates and pertinent matters.
- Ensuring all absentees from meetings are debriefed and copies of relevant minutes distributed and signed to confirm receipt and understanding.

All staff are informed that they are to report any issues to their Supervisor who will raise it in the monthly meeting.

The Supervisor will then display minutes of the meeting onto notice boards for workers to view.

Consultation

Worker participation enables workers to contribute in determining how the work can be done safely.

The Consultation arrangement is to be arranged and agreed upon by all parties with consideration given to any barriers in communication (ie: Language, cultural, literacy, disability).

Effective and meaningful consultation can result in:

- Reduced injury and disease;
- Improved management decisions through gathering a wider source of ideas about WHS
- Greater employer and worker commitment to HSEQ through a better understanding of WHS decisions and worker ownership of the outcome of consultation
- Greater openness, respect and trust between management and workers through developing an understanding of each other's points of view.

Seawolf Building Co will, so far as is reasonably practicable, consult when:

- Identifying or assessing hazards or risks
- Making decisions on how to control risks
- Investigating incidents and non-conformities and determining corrective actions to be taken.
- Making decisions about the adequacy of facilities for worker welfare (e.g. dining facilities, change rooms, toilets or first aid)
- Making decisions about procedures to:
 - 1. consult with workers on health and safety matters
 - 2. resolve health and safety issues
 - 3. monitor workers' health and workplace conditions
 - 4. provide information and training
- Determining the membership of any health and safety committee

Health and Safety Representatives and Committees

If requested by a worker or Seawolf Building Group, and required under legislation, a health and safety representative may be elected by the workers, and a health and safety committee may be established as per the requirements of the Work Health and Safety Act.

Site Safety Communication

Pre-start Briefings

Discuss work to be carried out that day, ensuring a JSA; SWMS has been completed addressing all safety risks. Determine if there have been any changes to site conditions that need to be addressed

Before assigning tasks, ensure the worker is competent to use any associated equipment or products.

Toolbox Meetings

Where required by the contract or for any site with above 3 workers (working for over 1 week) ensure a weekly toolbox meeting is scheduled

Ensure all workers are given the opportunity to raise issues and record minutes using the *Record of Safety Meeting Form*, ensuring agreed actions are allocated a responsibility and due date.

Always start the meeting by reviewing agreed actions from the previous meeting. Tick off actions that have been effectively completed and carry forward incomplete actions.

Where an issue arises that may impact other sites provide full details to the Safety Manager so that the issue can be discussed at the following Safety Committee Meeting.

Audit Records

Record of Safety Meeting Form 7.1

Form 7.1 Record of Safety Meeting Form

Time & date meeting commenced:		Time meeting concluded:			
Attendees					
Chairperson:					
Agenda Items					
Outstanding issues from previous meeting:					
2. New hazards:					
3. New incidences/injuries:					
4. New opportunities:					

5. Agenda Items:				
Corrective Action	Action by	Action Completed		
Corrective Action		Sign Off	Date	
Destinated by Managing Director				
Reviewed by Managing Director:				
iignature:			Date:	

8. Issue Resolution

Purpose

Management and workers of Seawolf Building Co have agreed upon the following issue resolution procedure. The agreed procedure aims to achieve the most efficient and effective resolution of all health and safety issues, as and when they arise. It is the responsibility of all management levels to resolve issues in their workplace. This procedure is applicable to all workers in the organisation.

Definitions

Nil

Procedure

The agreed procedure is as follows:

- 1. Where a worker identifies a health and safety issue, they should raise it with their immediate supervisor. The worker or supervisor should inform the Managing Director.
- 2. The issue should be dealt with as soon as possible after being reported. If it cannot be rectified immediately then a solution should be implemented as soon as practicable. As a minimum, interim measures should be put in place to prevent any adverse consequences until such time that the issue can be satisfactorily resolved.
- 3. Where the issue concerns work which involves an immediate threat to the health and safety of any person, the Manager in consultation with the Managing Director may direct that work will cease. Where an issue or an immediate threat remains unresolved, the Managing Director or workers may request the assistance of Health and Safety Authority. A Health and Safety Inspector may issue an Improvement Notice or a Prohibition Notice.
- 4. The issue and agreed outcomes should be tabled during the next safety meeting to notify all personnel of the issue and agreed control options. This communication should be formal using the *Hazard & Opportunity Report Form* as outlined in Appendix Procedure 2 Hazard Reporting.
- 5. Solutions should be recorded as well as communicated to relevant workers for their information.
- 6. Where relevant, the issue and control options should be documented in a hazard identification form by the Manager and distributed to all sites within the control of the company for tabling at safety meetings.

Audit Records

Hazard Report Record of Safety Meeting Minutes Form 7.1	
Agreed by Managing Director:	Date

9. Emergency Procedures

Purpose

To provide the emergency control, structure and directions which will prevent injury to personnel, visitors and neighbouring people/premises in the event of an emergency. The procedures also aim to minimise damage to the organisation's equipment, plant and installations.

Definitions:

Nil

Key principles

- All risks will be continually monitored in order to minimise the potential of an emergency.
- The safety of personnel is foremost.
- Emergency plans will be formulated and reviewed in consultation with personnel, emergency service specialists and in line with statutory requirements.
- Plans should be simple but effective.
- Emergency control personnel will be trained in their appointed duties.
- All personnel will be regularly trained in appropriate response procedures.

Procedure for Development of Emergency Plans

- 1. The Manager shall identify possible emergency situations using the Hazard Identification, Risk Assessment and Control Procedure. A record of the assessment shall be kept.
- 2. The Manager shall develop emergency plans based on the Standard Requirements and using *Emergency Procedure for Workers Form*.
- 3. Emergency plans shall be developed and maintained with consideration given to the nature and size of the workplace.
- 4. Emergency Plans must be kept up to date and reviewed every 6 months, by the Manager.
- 5. Emergency Information to be displayed in the Work Health and Safety Manual and on notice boards etc.
- 6. An emergency plan diagram of the site showing exit points, fire extinguishers, hose reels and muster points will be displayed.
- 7. Equipment provided for Emergency Procedures shall be checked monthly as part of the monthly *Workplace Inspection Checklist Form*.
- 8. Emergency plans to be tested at least annually to ensure all personnel are aware of details of the plan. Records of tests to be maintained on *Evacuation Review Report Form*.
- 9. Workers will be trained in Emergency Procedures, and training recorded on the Worker competency Licence and Training Record.

Audit Records

Assessment(s) of On-site and Off-site Emergencies Emergency Plan (diagram) Reviews of Emergency Plans Evacuation Review Report Form 9.3 Workplace Inspection Checklist Form 10.2 Training Records

Form 9.1 Emergency Procedures for Workers

EMERGENCY PROCEDURES FOR WORKERS

- 1 The alarm will be raised by (an audible alarm or instructions over PA System etc)
- 2 Assist anyone in danger if safe to do so
- 3 If safe use extinguisher to smother fire
- 4 Move to assembly point on signal, on instruction from supervisor or when it is unsafe to remain in the area
- 5 Assist visitors and disabled persons to evacuate.
- 6 Remain at Assembly Area until instructed by Supervisor

Form 9.2 Medical Emergency

Step 1 Check for any threatening situation and control it if safe to do so Step 2 Remain with casualty (unless there is no other option) and provide appropriate support Step 3 Do not move any casualties unless in a life-threatening situation Step 4 Notify the Manager and the first aider Step 5 Notify the ambulance if not already done and designate someone to meet them Step 6 Provide support to first aider or ambulance if required

Form 9.3 Evacuation Review Report

Date	Drill, false alarm or fire	Time taken to evacuate	Comments	Initial

10. Workplace Inspection Procedures

Purpose

The objective of this procedure is to describe the process whereby management and workers may together identify hazards and take action to prevent injuries and illnesses arising out of work at the organisation's workplace.

The process involves inspection, communication, evaluation and review. A key feature of the process is to ensure management accountability and the commitment of all personnel to hazard elimination and control. This is a formal process and must be complimented by informal inspections on a regular basis.

Definitions

Nil

Procedure

- Formal workplace inspections will be conducted monthly using the *Workplace Inspection Checklist Form*. The monthly Workplace Inspection Checklist may be completed by any worker but must be signed off by the Manager.
- The Checklist may be modified to include a check on any controls implemented as a result of previous hazard identifications.
- Items which generate a "No" response on the Checklist will be immediately transferred to a Hazard & Opportunity Report Form unless able to be immediately rectified.
- Annual Workplace Inspection Calendar will be prepared and maintained by the Manager. The inspection calendar will document the required date for completion of the Workplace Inspection Checklist Form as well as the name of the worker who will conduct the inspection.
- All workers are required to participate in the completion of the *Workplace Inspection Checklists Form* on a rotational basis. The worker who has completed the checklist will sign the inspection calendar to indicate completion. A copy of the calendar will be provided to all workers via a notice board or similar.
- Hazard & Opportunity Report Form attached to the Workplace Inspection Checklist Form will be tabled at the safety Meeting.
- All personnel will have access to inspection reports.
- The Managing Director will review the process annually.

Audit Records

Annual Workplace Inspection Calendar Form 10.1 Workplace Inspection Checklist Form 10.2 Hazard Report Record of Safety Meeting Form 7.1

Form 10.1 Annual Workplace Inspection Calendar

2022	Inspection Date	Nominated Worker	Worker Signature (to indicate completion)	Managing Director Signature
January				
February				
March				
April				
May				
June				
July				
August				
September				
October				
November				
December				

Form 10.2 Workplace Inspection Checklist

Site Location:	
Date of Inspection:	
Workplace Inspection Calendar completed by:	

	Itom	Vos	No	N/A
1	Item Fire	Yes	No	IN/A
1	Extinguishers are in place			
	 			
	Have been serviced within the last 6 months. Associated the outing wisher is clear for a 1 meter radius.			
	Area around the extinguisher is clear for a 1-meter radius			
	Fire exit signs are visible			
	Fire exit signs are in working order Exit doors are not blocked			
	Emergency drill carried out within the last 6 months			
2	Electrical			
	No broken plugs, sockets or switches			
	No frayed or damaged leads			
	Portable power tools in good condition			
	No temporary leads on the floor			
	Testing and tagging of electrical items has been attended within the last 12			
	months.			
3	General lighting			
	There is adequate illumination in working areas			
	There is good natural lighting			
	There is no direct or reflected glare			
	Light fittings are in good working condition and are clean			
	Emergency lighting is operational			
4	Walkways			
	No oil or grease			
	Walkways are clear of obstruction			
	Walkways are clearly marked			
	There is unobstructed vision at intersections			
	Stairs not blocked and are in good condition			
5	Rubbish			
	Bins are located at suitable points			
	Bins are not overflowing			
6	Work benches			
	Clear of rubbish			
	Tools are stored properly			
	Adequate work height			
	No sharp edges			
7	Storage			
	Materials stored in racks in a safe manner			
	Pallets are in good condition (no broken wood)			
	Floor around racking is clear of rubbish or obstacles			
	Racking is in good condition, no damaged uprights, beams etc			
8	Chemicals			
	SDS for all chemicals			
	SDS Register is available and current			
	Containers are clearly and accurately labelled			
	All chemicals are stored in accordance with the SDS			
<u> </u>				
			I	I

	Item	Yes	No	N/A		
9	First aid			.,,.		
	First aid kits and contents clean and orderly					
	First aid kit is adequately stocked (as per the schedule in the kit)					
	Easy access to first aid kits					
	All workers are aware of location of first aid kits					
10	At least one worker on site has a current senior first aid certificate Floors			+		
10						
	 Even surface with no large cracks, holes or trip hazards Floors are not obstructed 			+		
	Floors are free from grease, oil etc			+		
11	Office					
11	No exposed leads					
	Air conditioning working adequately					
	Filing cabinets are stable and in good repair					
	Workers' chairs at correct height (knees at right angles. Feet flat)					
	 Workers' monitors correct distance (arms length away when seated) Workers' monitors correct height (eyes in line with top of screen) 		1			
	Workers' monitors correct neight (eyes in line with top of screen) Workers' mouse located beside keyboard (allows relaxed arms and wrists)		1			
	Workers' keyboard located beside keyboard (allows relaxed arms and wrists) Workers' keyboard located near edge of desk (allows relaxed arms)		1			
12	Machines		<u> </u>			
14	Power equipment maintenance carried out as per 12. Plant Maintenance					
	Power equipment maintenance carried out as per 12. Plant Maintenance Power equipment clean		1			
	All guarding in place and interlocks working		1			
13	Display Material					
13	WHS Policy statement signed by the Managing Director and displayed on					
	notice boards					
	• Return to Work Program signed by Managing Director and displayed on					
	notice boards					
	"No Smoking" signs are displayed "Go. "Go. h" "G			-		
	"Staff only" or "Restricted Area" signs are displayed in relevant areas			_		
	"Manual Handling" poster is displayed in warehouse area			_		
1.4	Safety notice board is available and current					
14	 WHS Information WHS Manual is available to workers 					
	Injury/Incident Report form is available Injury/Incident reporting forms are available.					
	Injury / Incident reporting forms are available					
	Hazard reporting forms are availableSite emergency plan is displayed					
15						
13	Additional items for review					
Additi	onal comments or actions required:					
Copies sent to:						
Cianadh. Faralana a comina ant Warlinland						
Signed by Employee carrying out Workplace Inspection:				Date:		
Sign	ed by Managing Director:			Date:		
SIGIL	Signed by Managing Director: Date:					

11. Office Safety

Purpose

A large percentage of workplace incidents and injuries occur in offices. Seawolf Building Co is committed to providing a safe and healthy working environment free from injury for all workers, clients and visitors.

This policy is intended to ensure safety in office environments.

Procedure

Like a workshop or laboratory, an office requires preventive measures to ensure a safe and healthy environment. Common causes of office incidents include the following:

- Slipping, tripping, and falling hazards
- Burning, cutting, and pinching hazards
- Improper lifting and handling techniques
- Failure to remain attentive
- Improper office layout and arrangement
- Dangerous electrical wiring
- Exposure to toxic substances
- Horseplay

Good Housekeeping Practices

Many office incidents are caused by insufficient housekeeping practices. By keeping the office floor both neat and clean, you can eliminate most slipping, tripping, and falling hazards. Other good housekeeping practices include the following:

- Ensure that office lighting is adequate. Replace burned out light bulbs and have additional lighting installed, as necessary.
- Ensure that electrical cords and phone cords do not cross walkways or otherwise pose a tripping hazard. If you cannot move a cord, have a new outlet installed or secure the cord to the floor with cord covering strips. Do not run cords underneath carpet and avoid the use of tape whenever possible.
- Report or repair tripping hazards such as defective tiles, boards, or carpet immediately.
- Clean spills and pick up fallen debris immediately. Even simple items such as a loose pencil could cause a serious falling injury.
- Keep office equipment, facilities, and machines in good condition.
- Store items in an approved storage space. Take care to not stack boxes too high or too tight. Clearly label boxes with their contents.
- Keep all drawers and cupboard doors closed when unattended.

Chemical Hazards

Many common office chemicals can cause injuries if improperly used, stored, or disposed. Some common office chemicals include cleaning agents, glues, correction fluid, inks, and toners.

To guarantee the safe use, storage, and disposal of the chemicals in your office, always review the Safety Data Sheet (SDS) and/or container label for important information.

Cuts and Punctures

Cuts and punctures happen when people use everyday office supplies without exercising care. Follow these guidelines to help reduce the chance for cuts and punctures:

- When sealing envelopes, use a liquid dispenser, not your tongue.
- Be careful when using kitchen knives, scissors, staplers, letter openers, and box openers. Any of these items could cause a serious injury.
- Avoid picking up broken glass with your bare hands. Wear gloves and use a broom and a dustpan.
- Place used blades, broken glass, or other sharp objects in a rigid container, such as a box, before disposing in a wastebasket.

Machine Incidents

Only use machines that you know how to operate. Never attempt to operate an unfamiliar machine without reading the machine instructions or receiving directions from a qualified person. In addition, follow these guidelines to ensure machine safety:

- Secure machines that tend to unexpectedly move during operation.
- Do not place machines near the edge of a table or desk.
- Ensure that machines with moving parts are guarded to prevent Incidents. Do not remove these guards.
- Unplug defective machines, place "Out of Order" signs on them, and have them repaired immediately.
- Do not use any machine that smokes, sparks, shocks, or appears defective.
- Close hand-operated paper cutters after each use.
- Take care when working with copying machines. If you have to open the machine for maintenance, repair, or troubleshooting, remember that some parts may be hot. Always follow the manufacturer's instructions for troubleshooting.
- Unplug paper shredders before conducting maintenance, repair, or troubleshooting.

Some items can be very dangerous when worn around machinery with moving parts. Avoid wearing the following items around machines with moving parts:

- Loose belts
- Jewellery
- Long, loose hair
- Long, loose sleeves or pants
- Scarves
- Ties

Slips, Trips, and Falls

The easiest way to avoid slips, trips, and falls is to pay attention to your surroundings and to avoid running or rushing. Additionally, you can improve the flow of office traffic by following these guidelines:

- Arrange office furnishings in a manner that provides unobstructed areas for movement.
- Keep stairs, steps, flooring, and carpeting well maintained.
- Ensure that glass doors have some type of marking to keep people from walking through, or into, them.
- Clearly mark any difference in floor level that could cause an Incident.
- Secure throw rugs and mats.
- Do not place wastebaskets or other objects in walkways.
- Close file drawers when you leave the cabinet.

Preventing Stress

To reduce stress and prevent fatigue, it is important to take mini breaks throughout the day. If possible, change tasks at least once every two hours. Stretch your arms, neck, and legs often if you do the same type of work for long periods of time. Rest your eyes often by closing them or looking at something other than the work at hand. For a quick pick-me-up, breathe deeply several times by inhaling through your nose and exhaling through your mouth. In addition, try eating your lunch somewhere other than at your desk.

Other examples of stress-relieving exercises that can be done at your desk include the following:

<u>Head and Neck Stretch:</u> Slowly turn your head to the left and hold it for three seconds. Slowly turn your head to the right and hold it for three seconds. Drop your chin gently towards your chest, and then tilt it back as far as you can. Repeat these steps five to ten times.

Shoulder Roll: Roll your shoulders forward and then backward using a circular motion.

<u>Upper Back Stretch</u>: Grasp one arm below the elbow and pull gently towards the other shoulder. Hold this position for five seconds and then repeat with the other arm.

<u>Wrist Wave:</u> With your arms extended in front of you, raise and lower your hands several times.

<u>Finger Stretch:</u> Make fists with your hands and hold tight for one second, then spread your fingers wide for five seconds.

Equipment Safety

Common office machines, such as the following, require special safety considerations: copiers, microwaves, shredders and computers. Be sure you know how to operate these machines before using them, and never use one of these machines if you think it is defective.

Other office equipment that requires safety consideration includes furniture such as file cabinets, shelves, desks, chairs, ladders, and step stools.

File Cabinets and Shelves

Because file cabinets and shelves tend to support heavy loads, treat them with special care.

Follow these safety guidelines for file cabinets:

- Secure file cabinets that are not weighted at the bottom.
- Ensure that file cabinet drawers cannot easily be pulled clear of the cabinet.
- Do not block room ventilation grates with file cabinets.
- Open only one drawer at a time to keep the cabinet from toppling.
- Close drawers when they are not in use.
- Do not place heavy objects on top of cabinets. Be aware that anything on top of a cabinet may fall off if a drawer is opened suddenly.
- Close drawers slowly using the handle to avoid pinched fingers.
- Keep the bottom drawer full. This will help stabilize the entire cabinet.

In addition, follow these safety guidelines for office shelves:

- Ensure shelves are secured.
- Place heavy objects on the bottom shelves. This will keep the entire structure more stable.
- Maintain 18 inches between top shelf items and the plane of the fire suppression sprinkler heads. In non-sprinkler areas, 24 inches must be maintained from top shelf items and the ceiling.
- Do not block room ventilation grates with shelves.
- Never climb on shelves (even lower shelves). Use an approved ladder or step stool.

Desks

Follow these safety guidelines for office desks:

- Keep desks in good condition (i.e., free from sharp edges, nails, etc)
- Ensure that desks do not block exits or passageways.
- Ensure that glass-top desks do not have sharp edges.
- Ensure that desks with spring-loaded tables function properly. The table should not spring forth with enough force to cause an injury.
- Do not climb on desks. Use an approved ladder or step stool.
- Keep desk drawers closed when not in use.
- Repair or report any desk damage that could be hazardous.

Chairs

Safety guidelines for office chairs include the following:

- Do not lean back in office chairs, particularly swivel chairs with rollers.
- Never climb on a chair. Use an approved ladder or step stool.
- Office desk chairs should have adjustable back supports and seat height. Make sure that your chair's back support position and seat height are comfortable.
- Take care when sitting in a chair with rollers. Make sure it does not roll out from under you when you sit down.
- Repair or report any chair damage that could be hazardous.
- Do not roll chairs over electrical cords.

Ladders and Step stools

Always use an approved ladder or step stool to reach any item above your extended arm height. Never use a makeshift device, such as a desktop, file cabinet, bookshelf, chair or box, as a substitute for a ladder or step stool.

Follow these guidelines when using ladders/step stools:

- Do not load ladders or step stools above their intended capacity.
- Place ladders or step stools on slip-free surfaces even if they have slip-resistant feet.
- Avoid placing ladders or step stools in walkways, and never place them in front of a door, unless the door is locked and barricaded.
- Refer to the Industrial Safety section in this manual for more information on ladder safety.

Ergonomics and Workstation Arrangements

Ergonomics involves adjusting work processes or stations to fit a particular worker. Improper ergonomic design can cause debilitating long-term musculoskeletal effects. Ensure Ergonomic principles are used when setting up desks and workstations.

Audit Records

Training Records

12. Workplace Harassment/Bullying

Purpose

To provide a safe workplace to all Seawolf Building Co's workers through effective management of workplace harassment/bullying.

Policy

Seawolf Building Co is committed to providing a work environment that is pleasant for workers to work in and conducive to good workplace relations. This policy is aimed at ensuring that workers are not subjected to any unwanted workplace harassment/bullying. Harassment/bullying in the workplace decreases productivity, increases absenteeism and is also against the law. For these reasons, harassment/bullying will not be tolerated at Seawolf Building Group. For the purpose of this policy 'harassment' includes bullying.

Harassment/Bullying - Workplace harassment/bullying is where a person or persons are subjected to unreasonable behaviour, other than sexual harassment, that is unwelcome and unsolicited, the person considers to be offensive, intimidating, humiliating or threatening and/or a reasonable person would consider to be offensive, humiliating, intimidating or threatening.

Examples of unreasonable behaviour include, but are not limited to:

- Abusive, insulting or offensive language or comments
- Unjustified criticism or complaints
- Repeated threats of dismissal
- Exclusion from activities where deliberate
- Spreading rumours
- Setting unreasonable work tasks or timelines
- Sabotaging a person's work performance by withholding information or giving incorrect information
- Changing of rosters/work arrangements so as to deliberately inconvenience a worker or workers.

What is **not** considered unreasonable behaviour:

- Setting reasonable work tasks and timelines
- Reasonable rostering/work arrangements
- Deciding not to select a worker for promotion where a reasonable process is followed
- Informing a worker about unsatisfactory work performance in an honest, fair and constructive way
- Informing a worker about inappropriate behaviour in an objective and confidential way
- Implementing organisational changes or restructuring
- Taking disciplinary action, including suspension or terminating employment.

Seawolf Building Co has a legal responsibility to take reasonable steps to prevent harassment from happening in the workplace. This involves educating workers about harassment, putting in place this policy, setting behaviour standards, implementing grievance and complaint handling procedures, and ensuring compliance by all in the workforce.

Harassment in the workplace can create unpleasant or even hostile work environment. Harassment makes work difficult for everyone – the person being harassed, as well as workers witnessing the harassment. The harasser also is not concentrating on their work when he/she engages in this type of behavior. It can also damage the reputation of a company.

Harassment outside the Workplace

Workplace harassment can take place off site. Examples would be harassment occurring at a work Christmas party, unwanted phone calls to a worker's home, and following workers home from work, text messaging, internet chat rooms or other social media channels.

Harassment of Customers

The way workers treat clients and customers is extremely important for the image of the company. Harassment of customers or clients is not only bad for business; it is against the law and can result in legal action being taken by the customer or client against the company.

Bullying and workplace violence

Workplace violence is any action, incident or behavior in which a person is physically assaulted, threatened, harmed or injured in circumstances relating to their work. The risk of workplace violence must be eliminated or minimised so far as is reasonably practicable.

Incidents of workplace violence (i.e. physical assault or the threat of physical assault) should be reported to the police because these are criminal matters.

Victimisation

Victimisation happens where a worker is treated harshly or subjected to any detriment because they have made a complaint of discrimination or harassment. Victimisation will also happen if a person is subjected to a detriment because they have furnished any information or evidence in connection with a discrimination complaint.

A complaint of victimisation is made in the same way as a complaint of discrimination or harassment. Victimisation is either dealt with as an offence punishable by fine, or can be the subject of a damages award, depending on which law the complaint is brought under.

Responsibility:

Managers/Supervisors

- Managers and supervisors must ensure that they do not harass or bully workers, other managers or supervisors, clients or customers.
- Carry out risk assessments and implement control measures to prevent workplace harassment within (insert business name).
- Ensure all workers have been provided with information regarding their rights and responsibilities in relation to workplace harassment.
- Ensure they have the appropriate training in handling workplace harassment complaints, including an understanding of both informal and formal complaint resolution options.

All Workers

- Each worker must ensure that they do not engage in harassing or bullying behaviour towards other workers, managers or supervisors, clients or customers.
- Workers should be aware that they can be held legally responsible for their unlawful acts. Workers, who aid, abet or encourage other persons to harass and bully can also be held legally liable.
- Raise any issues or concerns relating to workplace harassment with Manager or Supervisor.
- Ensure they have an understanding of the options available to resolve workplace harassment issues.

Procedure

Behaviour standards

Seawolf Building Co has standards of behaviour for workers to:

- Act in a responsible and professional manner
- Treat others in the workplace with courtesy and respect
- Listen and respond appropriately to the views and concerns of others
- Be fair and honest in their dealings with others.

Complaint Handling System

Any complaints of workplace harassment must be treated seriously and investigated promptly, confidentially and impartially. Harassment complaints can be lodged informally or formally. The complaint system developed must therefore be capable of managing both types of complaints.

<u>Informal Complaints:</u> An informal complaint handling system may encourage workers to raise their concerns with an appropriate contact person within the workplace and the matter resolved in an informal and fair manner.

<u>Formal Complaints:</u> The system implemented to manage formal complaints of harassment must include the following:

- A formal reporting procedure
- An investigation procedure
- A complaint resolution procedure
- An appeals process

Grievance Procedure

If you believe that you are being harassed/bullied, there are several important steps you should take:

a) Tell the person that their behaviour is unacceptable, and that it must stop. It is important to say these things to the harasser otherwise they may interpret your silence as consent.

- b) Report the behaviour or incident to your manager. If the alleged perpetrator is a manager, then report the manager to a top management.
- c) Keep your complaint confidential this will avoid idle gossip and the possibility of defamation proceedings against you or the company.

If you make a complaint of workplace harassment/bullying it will be taken very seriously and will be dealt with sympathetically and in a confidential manner. The complaint will be investigated and, if found to be proved, appropriate warnings or other disciplinary action will be taken against the harasser. In serious cases, the harasser may be dismissed. You will not be victimised or treated unfairly for making a complaint.

If you are not satisfied with the way in which the company has dealt with your complaint, you can apply to the Fair work Commission for an order to stop the workplace bullying. Such workers should contact the Fair Work Commission to find out if they are eligible to apply for an order.

Education and Training

Seawolf Building Co will ensure that all workers are provided with the appropriate training and education on issues of workplace harassment which will enable them to:

- Understand the behaviours that are or are not workplace harassment.
- Understand the consequences of workplace harassing behaviours.
- Understand the process for lodging complaints of workplace harassment.

Audit Records

Training Register Risk Assessments

13. Sexual Harassment

Purpose

Seawolf Building Co is committed to ensuring that the Workplace is free from Sexual Harassment. Sexual harassment will not be tolerated, and that disciplinary action will be taken against any worker that breaches the policy.

Scope

This procedure applies to all Seawolf Building Co workers.

Responsibility:

Employer Responsibilities:

- The employer, as well as the person or persons who engaged in the sexual harassment can be liable to pay compensation for loss or damage suffered by a person as the result of sexual harassment. (Vicarious Liability)
- Employer must take 'reasonable steps' to prevent workers from treating others unfairly or badly.
- 'Reasonable steps' include having clear policies about fair treatment in the workplace, providing
 information and training for all staff, especially managers and supervisors, and having a fair
 process in place for dealing with complaints.

Management and Supervisors must ensure that:

- New staff are given training on appropriate behaviour in the workplace
- Supervisors, managers and staff are trained regularly in discrimination law
- They model appropriate behaviour themselves
- There is a clear workplace policy on appropriate behaviour which is reviewed and updated annually
- There is a process to deal with any complaints quickly, privately and seriously.

Workers must:

- Comply with the organisation's sexual harassment policy
- Maintain complete confidentiality if they provide information during the investigation of a complaint.

Procedure

Sexual harassment is an unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated or intimidated, and where that reaction is reasonable in the circumstances.

It has nothing to do with mutual attraction or friendship between people.

Sexual harassment does not have to be deliberate or repeated to be illegal.

Some sexual harassment, such as sexual assault, indecent exposure and stalking is also a criminal offence.

Seawolf Building Co aims to:

- Create a working environment which is free from sexual harassment and where all members of staff are treated with dignity, courtesy, and respect
- Implement training and awareness raising strategies to ensure that all workers know their rights and responsibilities
- Provide an effective procedure for complaints, based on the principles of natural justice
- Treat all complaints in a sensitive, fair, timely and confidential manner
- Guarantee protection from any victimisation or reprisals
- Encourage the reporting of behaviour which breaches the sexual harassment policy
- Always promote appropriate standards of conduct.

A person sexually harasses another person (the person harassed) if:

- The person makes an unwelcome sexual advance, or an unwelcome request for sexual favours, to the person harassed or
- Engages in other unwelcome conduct of a sexual nature in relation to the person harassed
- In circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated, or intimidated.

Examples of Sexual Harassment include:

- Staring or leering
- Unnecessary familiarity, such as deliberately brushing up against you or unwelcome touching
- Suggestive comments or jokes
- Insults or taunts of a sexual nature
- Intrusive questions or statements about your private life
- Displaying posters, magazines, or screen savers of a sexual nature
- Sending sexually explicit emails or text messages
- Inappropriate advances on social networking sites
- Accessing sexually explicit internet sites
- Requests for sex or repeated unwanted requests to go out on dates
- Behaviour that may also be considered to be an offence under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communications.

A worker who has been sexually harassed may seek assistance and further options from their manager, or other representative.

Complaints can be made to the relevant state authority in accordance with state legislation as listed below:

VIC

Victorian Equal Opportunity and Human Rights Commission Victoria Equal Opportunity Act 1995

QLD

Anti-Discrimination Commission of Queensland Queensland Anti-Discrimination Act 1991

NSW

Anti-Discrimination Board of New South Wales New South Wales Anti-Discrimination Act 1977

NT

Northern Territory Anti-Discrimination Commission Northern Territory Anti-Discrimination Act 1996

SA

South Australia Equal Opportunity Commission South Australia Equal Opportunity Act 1984

WA

Equal Opportunity Commission Western Australia Western Australia Equal Opportunity Act 1984

TAS

Office of Anti-Discrimination Commission (Tasmania) Tasmania Anti-Discrimination Act 1998

ACT

ACT Human Rights Commission
Australian Capital Territory Discrimination Act 1991

Commonwealth

Australian Human Rights Commission Sex Discrimination Act 1984

Audit Records

Training Records

14. First Aid

Purpose

Seawolf Building Co is committed to providing first aid facilities and trained staff to assist workers when first aid is required.

Responsibilities

Managers and Supervisors

- Ensure First Aiders are given appropriate training
- Ensure they are available to perform first aid when required
- Ensure first aid equipment is readily available at the workplace

First Aider

- Ensure their training is current and up to date
- Advise the Supervisor of any injuries and status
- Keep the first aid facilities up to date and clean

Procedure

First Aiders to:

- Attend to all injuries when First Aider is required even if it is not for the area you are working
 in.
- If more than one First Aider is in attendance, assist where possible or return to section as required.
- Assess the person's condition, if required contact the Ambulance on 000.
- If Ambulance or Paramedics are called, contact Manager to advise of pending arrival to avoid unnecessary delays
- Once the First Aider has fulfilled their requirements for treatment, they must advise the Supervisor and ensure all details are filled in correctly on the *Injury/Incident Report Form*

Waste Management

Contaminated waste should be placed in a leak-proof bag or container and sealed. The bag or container should not be overfilled. All waste should be handled with care, to avoid contact with blood and body substances. Gloves should be worn when handling contaminated waste bags and containers.

Where significant amounts of first aid waste are generated, contaminated items should be placed in clinical waste bags. These are yellow coloured plastic bags which display the international biohazard sign (available from medical suppliers). Waste disposal should comply with state or local government requirements.

Management Body Substance Spillage

Spills should be attended to as soon as possible. Protective gloves should be worn. Absorbent material, such as paper towels should be used to absorb the bulk of the blood or body substance. These contaminated materials should then be disposed of in a leak-proof, sealed waste bag.

After this, the area should be cleaned with warm water and detergent and then disinfected. A suitable disinfectant is a freshly prepared 1:10 dilution of 5% sodium hypochlorite (household bleach) in water. Mops and buckets should be rinsed with warm water and detergent and stored dry.

PPE

PPE should be provided to protect first aid personnel and ill or injured persons from the risk of exposure to biological hazards. Where PPE is used, it should be properly selected for the task, be readily available, clean and properly maintained. First aid personnel should be trained in the correct use of the equipment provided. PPE should comply with relevant Australian Standards.

PPE could include:

- Protective gloves which should be worn whenever there is a potential for contact with blood or body substances. Disposable PVC or latex gloves should not be reused. Heavy duty gloves may be worn where a higher level of protection is required, for example, where there is a risk of exposure to sharp objects or when cleaning a blood or body substance spill.
- **Protective clothing** such as disposable non-porous overalls or plastic aprons which should be worn in situations where there is a risk that clothing of first aid personnel may become contaminated with blood or body substances.
- **Eye protection** such as goggles and safety glasses which should be worn where there is a risk of blood or body substance splashes entering the eyes, for example, from arterial bleeding injuries.
- Safety footwear which should be worn where there is a risk of the feet being punctured by sharp objects, such as broken glass or hypodermic needles.
- Resuscitation mask because expired air resuscitation may involve exposure to blood and body substances. Use of a resuscitation mask for mouth to mask resuscitation reduces this risk. A resuscitation mask should only be used if first aid personnel have received instruction in its use.

The nature and size of the workplace are taken into consideration when determining first aid requirements, however as a minimum, first aid kits should include:

- Adhesive strips (assorted sizes) for minor wound dressing
- Non-allergenic adhesive tape for securing dressings and strapping
- Eye pads for emergency eye cover
- Triangular bandage for slings, support and/or padding
- Hospital crepe or conforming bandage to hold dressings in place
- Wound/combine dressings to control bleeding and for covering wounds
- Non-adhesive dressings for wound dressing
- Safety pins to secure bandages and slings
- Scissors for cutting dressings or clothing
- Kidney dish for holding dressings and instruments
- Small dressings bowl for holding liquids
- Gauze squares for cleaning wounds

- Forceps/tweezers for removing foreign bodies
- Disposable latex or vinyl gloves for infection control
- Sharps disposal container for infection control and disposal purposes
- Sterile saline solution or sterile water for emergency eye wash or for irrigating eye wounds (this saline solution must be discarded after opening)
- Resuscitation mask to be used by qualified personnel for resuscitation purposes
- Antiseptic solution for cleaning wounds and skin
- Plastic bags for waste disposal
- Note pad and pen/pencil for recording the injured or ill person's condition and treatment given
- Re-usable icepack for the management of strains, sprains and bruises

In some workplaces specific injuries or illnesses may occur. Additional first aid kit contents and facilities, including properly trained people, should be provided, for example:

- Where burns have been identified as potential injuries
- Where eye injuries/poisoning may occur
- Where chemical splashes may arise in which case an emergency shower would be necessary

Audit Records

Injury/Incident Report Form 5.1
First Aid Training Records
Workplace Inspection Checklists Form 10.2

15. Personal Protective Equipment

Purpose

To establish a procedure for Personal Protective Equipment (PPE) selection, supply, use, replacement, maintenance, training and instruction, storage and keeping of appropriate records.

Definitions

PPE&C Personal protective equipment and clothing

AS/NZS Australian Standard/New Zealand Standard

Procedure

Provision of PPE shall only be made after an assessment of the risk has been conducted and in consultation with the workers, and it is agreed no alternative solution is available to protect the workers, such as engineering controls.

Purchase Specifications

Seawolf Building Group will ensure all items of PPE are manufactured, used and maintained in accordance with the relevant Standard. Proof of standards compliance will be determined prior to purchase.

Usage, Care and Replacement of PPE

Manufacturer's instructions shall be used as the guide to determine effective usage, care and replacement requirements for PPE used by the company.

All issues of PPE to each worker will be recorded on Personal Protective Equipment Issue Record Form.

Each worker will be instructed and trained in the correct use of each PPE item prior to use, including ensuring that the selected PPE properly fits each worker.

Workers must not misuse or damage the equipment and PPE will be kept in good, hygienic condition.

Workers must report any damaged or defective PPE.

Managers are responsible for supervising and enforcing the PPE program.

The effectiveness of the PPE program shall be evaluated on a regular basis during audits and inspections.

Reviews of the need for and adequacy of PPE will be conducted regularly. All reviews will be in consultation with workers using the PPE.

Non-Compliance

Workers who fail to comply with the health and safety requirements of the company, or those who demonstrate consistently poor safety performance, shall be subject to disciplinary measures.

Audit Records

Risk Assessment Form 1.2 Personal Protective Equipment Issue Record Form 15.1 Workers Training Registers

Form 15.1 Personal Protective Equipment Issue Record

PPE Item	Date of Issue/Replacement	Name of Employee	Signature of Recipient *

^{*} The signature indicates confirmation that the worker has received the listed PPE with appropriate instructions and training in its correct use.