

# Workplace Health and Safety Management System Review

Report and Recommendations

*January 2022*



# WHS Management System Review

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## Executive Summary

Perth Workplace Safety Consultant Pty Ltd was engaged to conduct an independent review of the status of its Occupational Health and Safety and Management System (OHS MS) against both current legislation and the upcoming Work Health and Safety Legislation WA.

The review of the system has been driven primarily by the upcoming changes to Western Australia's Safety Legislation, to which will become during the first quarter of 2022 the WHS Act and WHS Regulations.

The Shires WHS MS framework (plans, procedures etc.) generally meet the requirements of Western Australia's safety legislation, however there were a couple key procedures (document control, Communication and Consultation, WHS Reporting and Records) that were absent.

At the time of the review in October 2021, it was also noted that several key due diligence regimes were either poorly maintained, not in use or not existent. Examples of this include an audit schedule poorly maintained or utilised, training plans and training matrix not in use and a risk register of the Shire of Serpentine and Jarrahdale's activities and risks not existent.

In total there were 47 conforming criteria items, 60 non conformances and 1 criteria that was not applicable.



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## Background

Located approximately 45 kilometres from the Perth CBD, the Shire of Serpentine Jarrahdale is a local government area in the outer metropolitan area of Perth and has an area of 905 square kilometers and a population of almost 36,403.

As part of its ongoing continuous improvement process and to ensure compliance with the new upcoming WHS legislation, the Shire of Serpentine Jarrahdale engaged Perth Workplace Safety Consultant to conduct an independent, external review of progress and extent of preparedness for the implementation of the new legislation.

## Audit Objectives

Undertake a review (gap analysis) of the current OHS management system against current legislative requirements and the new upcoming WHS legislation. The aim of the review is to identify gaps between the Shire of Serpentine Jarrahdale OHS system and legislative requirements with the view of developing an action plan to ensure improved compliance.

The scope of the review includes the following:

- Review of OHS systems, processes, and procedures.
- Review of the current resourcing of the OHS functionality within the Shire.
- Consideration of the new WHS legislation and the Shire's preparedness for the introduction of the new legislation.
- Review of the online OHS system provision and recommendations of alternatives and their functionalities if relevant.
- Review of the functions of the OHS Committee.
- Review of any documentation required under any Standards.
- Review of OHS induction and training.
- Review of the volunteer role in the Shire and impact of the new WHS laws.

## Limitations

Nil

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## Review Methodology

The review methodology was to request evidence of compliance against the National Self Insurer WHS Audit Tool (NAT CTH). The Audit Tool is designed to examine a management systems design and implementation, it also is coherent with WHS legislation that is associated with SafeWork Australia.

Evidence was gathered through a combination of interviews with key personnel, audits conducted in the field and through examining records and copies of drafted and issued controlled documents.

The review focused on the Shire's Safety Management System, how effective it was and if the system was compliant to current legislation. Furthermore the review included all areas of the Shires activities from the current OHS department to the volunteers.

## Disclaimer

This verification report was produced in good faith by PWSC to assist Local Governments and reflects information that was considered accurate and reliable at the time of its publication. The employees of PWSC shall accept no liability or responsibility for any statutory enforcement or legal action against any Local Governments for reliance or use of the information contained herein.



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## Summary of findings against Key Focus Areas

### Review of OHS Systems, processes and procedures

The Shire of Serpentine Jarrahdale OHS system was undertaken firstly by reviewing documentation and then secondly confirming the processes within the documentation implemented. During the review of the documentation, it was evident that the OHS system currently in place is maintained on an adhoc basis and in some areas plans and procedures are incomplete, have key components missing or are non-existent.

The main documents that are standard for a safety management system (Safety Management Plan, Training Management Plan, and the Emergency Management Plan) were either incomplete or waiting on reviews. The Safety and Health Management Plan which is the overarching document that intertwines the safe work processes for the Shire's activities has several areas that are missing and areas needing updating.

Supporting procedures were reviewed and had similar outcomes to the management plans. The Safe Operating Procedures (SOPs) were reviewed, and most were discovered to be only risk assessments, there were others however that did follow the industry standards with regards forming procedures although this was inconsistent. The content of the Business Operating Procedures (BOP's) were found to be similar to the SOP's, some have adequate information that covers all situations however, there are other BOP's that contain very little and are out of date.

Due diligence processes such as workplace inspections, audits etc. are implemented at the direction of the individual and are adhoc throughout the Shire. This is mainly due to absent processes such as HSE Monitoring Procedures that provide information on Key Performance Indicators required for all levels of staff. There is also no one monitoring any actions that may arise from inspections, audits, and incident investigations, to ensure they are completed.

This situation provides the Shire with a safety management system that is both out of date and needing further information to ensure the Shire's employees are aware of the processes required to undertake their work safely eg. there's minimal information on risk management, which is a key proponent of working safely and a requirement under legislation.

The absence of a document control process is one of the causes of having mismatching documentation used throughout a business. It also is one of the main factors that contributes to documentation becoming irrelevant, out of date and/or missing key updates relating to industry standards or legislation changes.

### Review of the current resourcing of the OHS functionality within the Shire

With the current situation of the safety management system and the implementation in the field, it would not be prudent to say that the level of resourcing is adequate. The absence of key registers (corrective action register, training matrix, and overarching risk registers) is worrying as these registers assist with identifying areas that are lacking. The absence of the risk register is a major concern as it a key document when developing a safety management plan and system.

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Review of the draft safety management plan identified that it does not include risk management as you would expect (s3.1, Occupational Health and Safety Regulations 1996 WA) (there is also no risk management procedure). Risk Management is a requirement under current OHS legislation and is one of the key steps to ensuring the workplace is free from hazards.

The amount of work that is required to sustain a safety management system and ensure that it remains effective is generally more than what is currently in place for the Shire of Serpentine Jarrahdale. I would recommend that for the HSE department for the Shire of Serpentine Jarrahdale be at least 2 FTE.

One position being a coordinating role that ensures the documents are developed correctly using correct templates, the information contained is relevant and accurate and that legislation changes are captured, and documents reviewed and updated as required. The other position would be a field-based role that undertakes the due diligence of the safety management system.

The above resourcing numbers would satisfy for the effective management of the safety management system that is up to date, does not need repairs and covers all the Shire's activities. This, however, is not the situation at SSJ, where a lot of work is required to bring the safety management system up to standard and ready for the WHS legislation changes.

## Upcoming WHS legislation changes and the preparedness level of the Shire

The following are a list of changes that will come about when the new WHS Act and Regulations come into effect during Q1 2022.

### Key Changes between the current OHS Act to the upcoming WHS Act

1. Penalties are increasing – some slightly, some dramatically.
2. Introduction of the phrase “PCBU” – this stands for “person conducting a business or undertaking” and extends duties beyond the traditional employer-employee relationship to include anyone giving direction.
3. Broadening of the term “worker”. “Worker” now includes people such as volunteers, contractors, trainees etc.
4. Industrial manslaughter penalties. Fines and prison sentences have increased, plus prosecutors no longer have to convict the company to prosecute a company officer.
5. Positive due diligence. If a company officer show they have not met their obligations of due diligence, they can be prosecuted – even if an incident hasn't occurred.
6. Insurance can no longer pay penalties. It can still pay your legal fees.
7. External WHS advisors are now liable. They can be prosecuted in the same way as a business owner.
8. When the health of a person is discussed in the Act, it includes the physical and the psychological.



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## Key Changes between the current OHS Regs to the upcoming WHS Regs

1. Musculoskeletal disorders associated with hazardous manual tasks are to be managed by the PCBU.
2. Working at Heights (Falls) – includes requirements to include emergency rescue procedures.
3. Assessors are to be competent and have licences in the areas of assessment they are involved in.
4. Demolition work – notification to the regulator regarding demolition work, is to include input from an emergency services provider.
5. Restrictions with working on energised electrical equipment – aligns with reg 55 of electrical licensing regulations.
6. Use of power tools on engineered stone products must not be undertaken unless the activity is controlled (dust mitigation).
7. Designers of structures must submit a health and safety report for construction work.

Upon review of the Shires plans for the upcoming legislation changes, it was noted that preparations have begun. Some of the work that has begun includes the updates to the Induction and there has also been some work done on the Health, Safety and Wellbeing Management Plan, however this work is incomplete and requires further work.

A High-Level Risk Assessment that captures all the Shires activities and associated risks (currently absent) should be undertaken so the actual scope of supporting documents (other plans and procedures) that are required can be developed to meet not only the control aspect of the hazard but also the compliance with the current OHS legislation (and upcoming WHS legislation).

The majority of the supporting documents exist already, albeit they need a full review and update as there has been no monitoring of legislation changes over the years. The absence of a document control system has also impacted on the supporting documents as there are many different formats which are not to industry standards.

There is a lot of work to do in this space.

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## **Review of the online OHS system provision and recommendations of alternatives and their functionalities if relevant**

The current online systems that are in use by the Shire with respect to Health and Safety are Litmos (Training) and OneComm My Safety.

The Litmos online software is one that is used to manage all aspects of training, I have personally used this software in the past and found it easy to use (after one-on-one training) and it covered most of the areas that are needed with regards to training (develop training pathways, training matrix, online inductions etc.). There are some limitations to the system as to load training records onto the system they first had to be created in the system. Other than this it was a good method of managing training for the workplace.

The OneComm, My Safety system is one that has been developed as an addition to the system the Shire has engaged for their other online operations. The ability for everyone to enter hazards and incidents without the need to complete paperwork may sound good and beneficial to the environment, however the approval process being their line manager takes away the safety department input, especially when the person inputting the incident can be the one completing the investigation.

The level of detail that is within the training slides on completing an incident investigation is also very light on. The level of investigation from a minor incident to a major incident doesn't seem to change. The privacy of individuals that are involved with injuries and the like are required by law to have their details and evidence "suppressed" from other viewers, of which I don't think this system is able to do that. This of course is something that can be added with some programming.

The hazards and incidents can be printed out in a report with the particulars associated, the report could also be amended to capture other details more relevant to the incident (root causes, actions etc.). Corrective action registers are something that needs to be front of mind for any safety department, as they are the key changes that will prevent the incident from reoccurring.

Hazards and incidents when entered alert both the manager of the employee who reported the item and the Safety Advisor. It also alerts a pool of people related to safety including the People, Development and Wellbeing Manager and the HSR's.

It would be beneficial for workplace inspections and observations to be entered into an online system, for tracking and due diligence purposes. The actions arising from these leading indicators can also be captured by the same way OneComm has been setup to capture actions from incident and hazards.

Other lead and lag information that is commonly used in reports (TRIFR, LTIFR, Recordable Days, Restricted workdays, number of inspections completed, number of incidents, number of actions closed/open etc.) could (with some software programming and linking from other departments i.e. hours from HR) be included on the OneComm system.

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## Review functions of OHS Committee

Safety and Health committees can be an effective part of a safety and health communication and consultation system at the workplace. This is because they provide a medium for employers and employee representatives to discuss and make recommendations on safety and health issues. The members of the committee may make recommendations to the employer on programs, procedures, training, and review outcomes of hazards and incidents. However, the committee is an advisory group, and it remains the employer's responsibility to make decisions about safety and health issues.

The Shire of Serpentine and Jarrahdale has an OHS Committee that is an active committee that follows the guidelines as set out in the OHS legislation except for the balancing ratio of Management Staff to HSR (s39C Occupational Health and Safety Act WA 1984). The Shire has a procedure (HSWP4 Health and Safety Roles and Responsibilities) which provides further guidance on both what the Committee and the Shire itself expects from their members.

The Committee meetings have minutes taken and applicable safety topics are discussed. There however can be some improvements to the current setup which relates to the representation of all the departments. Furthermore, there is the opportunity to alter the roles and responsibilities of the Health and Safety Advisor to include providing coaching in the areas listed for the Health and Safety Representative. This will allow a consistent training process for the HSR especially when undertaking inspections and investigating incidents etc.

## Review of OHS Induction and Training

The current OHS induction was reviewed by first reviewing the provided Powerpoint slides and then secondly by being registered on the Litmos training system, that was organised by the SSJ HSE Advisor. The content that was made available through the Litmos induction training is aligned with the provided Powerpoint Slides (with exception of the code of conduct and conflict of interest).

The training covered the activities most likely to be undertaken while working at the Shire except for the following:

- Risk Management (brief discussion on spot the hazard).
- Emergency Preparedness (Emergency evacuation, fire precautions, first aid requirements).
- Lighting requirements.
- Working in differing temperatures.
- Permits.

The induction is the first training course that is provided to an employee and normally contains the high-level information that will assist the employee in their commencement in their new role.

Understanding where muster points are in an emergency and what sound or process is used to announce an emergency is paramount to ensuring that the employee is safe. Similarity with risk management, it is a safety tool that employees use to identify hazards prior to commencing their task so they can mitigate the risk and protect themselves from the hazard before they commence.

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Risk is mentioned in the modules 2-5 however, is only specific to risks such as Noise, Electrical Safety, Hazardous Substances etc. The module titled "Operations Hazard Induction" did have some substance with regards to hazard identification, however the information contained was brief and did not go into too much detail on what a hazard and a risk is, the hierarchy of controls and how to apply them, what likelihood or consequence meant or the different types of risk assessment tools and how to apply/use them.

The Operations Module (Construction and High Risk) informs the employee of training requirements prior to undertaking any high-risk activity (ticket, VOC, prestart etc.). Training is not captured on training plans nor is there a training matrix available. The Training Plan is also in draft form under review. The items listed here that are not in existence can easily be designed and managed in an excel spreadsheet.

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## Review of the volunteer role in the Shire and Impact with the new WHS laws

A volunteer organisation is a PCBU if it employs one or more paid workers. Volunteers that are within this type of volunteer organisation are treated as if they are employees. This means volunteers, must be provided the same protections as an organisation's paid workers. This protection covers physical safety as well as the workers mental health at work.

Volunteers who sit on the board of an organisation or be in another role where they make, or participate in making, decisions that affect the whole or a substantial part of the organisation they volunteer. The decisions they make may also have the capacity to significantly affect the organisation's financial standing. Only if a volunteer makes, or participates in making, these kinds of decisions are they are an 'officer' under the WHS Act.

Volunteer officers must exercise due diligence to ensure that the organisation complies with its health and safety duties. This means that you must ensure that the organisation has appropriate systems of work in place and must actively monitor and evaluate health and safety management within the organisation.

The Shire of Serpentine Jarrahdale currently has several volunteer programs active, examples include the Fire Brigade and Library. The Shire also has on their website, a section where they have included contact details for interested persons wanting to volunteer their time.

The review of the SSJ WHS documentation has found that it was focused more on the direct employees and to some extent contractors with very little information regarding volunteers, regulatory persons or visitors etc. For example, there is no clear process or procedure that is specific to volunteers that provides information regarding how volunteers are to be "protected at work".

To ensure the Shire of Serpentine Jarrahdale complies with the incoming WHS legislation change and to set out specific steps on how to be 'reasonably practicable' in ensuring the safety and health of volunteers, the following would be reasonable and practicable to:

- Ensure work areas under the control of the local government are free of hazards.
- Take action to ensure that volunteers understand their duties and responsibilities.
- Ensure the work of local government workers does not impact the health and safety of volunteers.
- Develop policies and procedures to ensure that adequate processes are in place during engagement of volunteers.
- Allocate sufficient resources to ensure the effective management and development of volunteer programs.
- Communicate and consult with volunteers on occupational safety and health issues.
- Induct and train/instruct volunteers in their tasks and ensure adequate supervision.

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## Audit Documents sighted

- Council Policy 1.4.3 – Health and Safety
- Council Policy 5.3.5 – Complaint Resolution
- Health and Wellbeing Policy – DRAFT - incomplete
- Health and Safety Strategic Plan – working copy
- Health, Safety and Wellbeing Operational Plan – DRAFT – incomplete
- E20/14535 Emergency Management
- Business Operating Policy (BOP) 1.4.5 – Fitness for work
- Business Operating Policy (BOP) 1.4.6 – Fitness for work
- Business Operating Policy (BOP) E19/1685 – Contractor Health and Safety Management
- Business Operating Policy (BOP) 1.4.3 – Workplace Behaviour
- Business Operating Policy (BOP) ### - Safety Training and Competence
- Business Operating Policy (BOP) ### - Reportable Incidents – Regulatory /Authorities
- Business Operating Policy (BOP) Health and Safety Issue Resolution (E19 1775)
- Business Operating Policy (BOP) – Manual updated Jodie Jan 2019
- Health and Safety – Work Procedures – E12 6913
- Health and Safety – Parks and Gardens Arborist
- Occupational Health and Safety Incident Investigation Toolkit March 2019
- Health and Safety (H&S) Incident Investigations – Establishing the facts worksheet (E19 1790)
- Contractor Management (induction manual)
- Health and Safety Requirements – Contractor Checklist
- Revised Health and Safety – Operations Induction – Module 1 (3.8.21)
- Revised Health and Safety – Safety Induction – Module 2 (3.8.21)
- Revised Health and Safety – Safety Induction – Module 3 (12.8.21)
- Revised Health and Safety – Safety Induction – Module 4 (18.8.21)
- Health and Safety – Operations Induction – Module 2
- Health and Safety – Operations Induction – Module 3
- Health and Safety – Operations Induction – Module 4
- Health and Safety Inspection Template – workshop
- Health and Safety Inspection Template – admin
- Health and Safety – Incident Investigation template
- E191722 Management Safety Observation template
- E19 8370 Health and Safety (H&S) Administration Workplace – Inspection Template
- Health and Safety – Risk Assessment – Hazardous Substance – Template
- Health and Safety – Risk Assessment. – Template
- Health and Safety – Training Needs Analysis Template
- Health and Safety – Training Plan Template
- Health and Safety ACM register
- Engineering Subdivisions – SWMS – Site Inspection
- Health and Safety – Dog attach hazards in the workplace
- Health and Safety – Risk Assessment working from home
- Health and Safety – Hazardous Chemicals Storage Guide
- Health and Safety – Purchasing Hazardous Substances – Checklist
- Health and Safety – (SOP) – Operation of a pole saw
- Health and Safety – (SOP) – Pedestrian Roller



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- Health and Safety – (SOP) – Irrigation testing and maintenance
  - Health and Safety – (SOP) – Hiab operation
  - Health and Safety – (SOP) - Mulching
  - Health and Safety – (SOP) – Chemical handling and application
  - Health and Safety – (SOP) – Litter Picking
  - Health and Safety – (SOP) – Operate Front End Loader
  - Health and Safety – (SOP) – Maintenance using hand tools
  - Health and Safety – (SOP) – Tree planting
  - Health and Safety – (SOP) – Operation of push mower
  - Health and Safety – (SOP) – Operation of edger
  - Health and Safety – (SOP) – Automotive parts washer
  - Health and Safety – (SOP) – Edger petrol operated
  - Health and Safety – (SOP) – Trimmer petrol operated
  - Health and Safety – (SOP) – blower vacuum
  - Health and Safety – (SOP) – Cut daw for demolishing works
  - Health and Safety – (SOP) – Chainsaw (petrol)
  - Health and Safety – (SOP) – Operation of chainsaw
  - Health and Safety – (SOP) – Hedge Trimmer
  - Health and Safety – (SOP) – Skid Steer Bobcat
  - Health and Safety – (SOP) – Refuelling drums at service station
  - Health and Safety – (SOP) – Stake Rammer
  - Health and Safety – Spill kit guide
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- Health and Safety – Annual EAP report
  - Litmos Training Screenshots – Senior Management (T.Cole and A.Trosic)
  - Screenshots – JD – Rosemary Jasper
  - Health and Safety - Management Safety Observation – completed 14/5/2019
  - Health and Safety – Site Safety Inspection – RCA – 3 March 2021
  - Health and Safety Incident Investigations – RCA – Jarrahdale Rd 26 Feb 2019
  - Health and Safety – 3 Steps to Safety Audit – Third Party Audit – 9/2019
  - Health and Safety – Safety Metric Report January – Feb 2021
  - Health and Safety – Safety Metric Report – June 2021
  - Health and Safety – Wellbeing Survey results
  - E21 10905 – Occupational Health and Safety Committee Meeting Minutes – 21 Jul21
  - E21 5106 – Health and Safety – Safety Moment Alert May 2021
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- Email – FW Health and Safety – 3 steps to safety audit – August 2019
  - Email – FW Safety Audit Presentation
  - Email – FW Health and Safety – 3 steps to safety audit August 2019
  - Health and Safety – Health, Safety and Wellbeing report 2019-2020
  - Health and Safety – Positive Performance Indicators Training Resource
  - Health and Safety – Manual task risk assessment – outdoor workers
  - Wormal Civil Contractors SMP – Reviewed RJ
  - Wormal Civil Contractors monthly report
  - Start up minutes – contractor tasks – STARTU\_4 – Soldiers hill

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## Recommendations

A summary of recommendations arising out of the review of the COE MS Standards is shown in the table below. For further detail as they relate to the findings, refer to Appendix A.

No.	Audit Number	Other Related Audit Number	Description
1.	1.1.1		<p><b><u>Non-Conformance</u></b> The health and safety policy does not include any commitment to managing risks and hazards.</p> <p><b><u>Recommendation</u></b> Review and amend Health and Safety Policy to include a commitment to managing risks and hazards in all of the Shires workplaces.</p>
2.	2.1.1	2.1.3, 2.1.5	<p><b><u>Non-Conformance</u></b> No known process of monitoring health and safety legislation, standards, codes of practice for updates and then updating relevant shire documentation and communicating changes to the workforce.</p> <p><b><u>Recommendation</u></b> Develop a process of how to check regularly for changes to legislation, standards and code or practices and then trigger a review of related documents to include those changes. Determine who this requirement is best suited for and include the requirement on the persons Job Description. Facilitate training in the use of the procedure and how to effectively manage the requirements.</p>
3.	2.1.2		<p><b><u>Non-Conformance</u></b> SOPs don't list required legislation – SOP's will need to have a section added that references applicable legislation for the task.</p> <p><b><u>Recommendation</u></b> Review and update SOP's to include all relevant applicable legislation. The template used for viewed SOP's vary from one to another, to ensure consistent approach with developing SOP's for end user application, a generic template is to be developed and applied to all SOP's.</p>

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No.	Audit Number	Other Related Audit Number	Description
4.	2.1.4		<p><b><u>Non-Conformance</u></b> The PCBU and/or individual satisfy legal requirements to undertake specific activities, perform work or operate equipment</p> <p><b><u>Recommendation</u></b> Training Matrix available via Litmos online program however not used. During field inspections it was noted that some departments were not able to produce evidence of SOP or VOC for high risk equipment. A procedure is to be developed that will detail the process the SSJ will undertake to ensure competency of their workers on plant and machinery.</p>
5.	2.2.1		<p><b><u>Non-Conformance</u></b> HSE plan viewed was in draft form and still needed a lot of work to be compliant. There were no objectives or targets that monitor all aspects of safety.</p> <p><b><u>Recommendation</u></b> Review and update HSE plan to include all legislation changes and requirements. Ensure the objectives and targets are reviewed for the Shire and are adequately addressed.</p>
6.	2.3.1		<p><b><u>Non-Conformance</u></b> The HSE plan viewed did not cover all aspects of the Shires activities and hence not all risks are included.</p> <p><b><u>Recommendation</u></b> Review and update HSE plan to include all legislation changes and requirements. Ensure the objectives and targets are reviewed for the Shire and are adequately addressed.</p>
7.	2.3.2	4.3.3, 4.5.3, 5.1.2	<p><b><u>Non-Conformance</u></b> Corrective actions are not effectively tracked as there is no corrective action register that is maintained on a regular basis.</p> <p><b><u>Recommendation</u></b> Develop a procedure (Performance Monitoring) that includes criteria on managing corrective actions. Included in this procedure is a standard corrective action register that is to be used for all departments and have the responsibility of managing the review and closure to the HSE department.</p>

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No.	Audit Number	Other Related Audit Number	Description
8.	2.3.3	1.1.3, 3.3.11, 3.7.1, 3.8.1, 3.8.2, 3.8.4, 3.9.7	<p><b><u>Non-Conformance</u></b></p> <p>There is no process or procedure that details when a document should be reviewed, why and who should have the responsibility for it. There is also no process or procedure available that dictates the templates to use when creating new documentation.</p> <p><b><u>Recommendation</u></b></p> <p>Develop a document control process that ensures documents are reviewed regularly, the correct templates are used for the specific document being developed and the correct person are reviewing and approving the document.</p>
9.	3.3.6		<p><b><u>Non-Conformance</u></b></p> <p>Upon review of documentation related to training, there was not anything mentioned regarding ensuring trainers used have the appropriate qualifications prior to commencing training and or assessing activities.</p> <p><b><u>Recommendation</u></b></p> <p>Develop a process where any trainer or assessor used for the Shire are required to have suitable qualifications that will enable the training and assessing on the plant, equipment or process that they were hired to undertake. This also relates to any Shire employee that does any training or assessing.</p>
10.	3.1.2		<p><b><u>Non-Conformance</u></b></p> <p>Insufficient skills and resources are in place with responsibility for the day to day management of Health, Safety and Environmental issues and activities.</p> <p><b><u>Recommendation</u></b></p> <p>On-board an additional person to assist the HSE Advisor in this role. Review the current HSE Advisor Job Description and remove the coordination type activities and develop a new role – “HSE Coordinator”.</p>

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No.	Audit Number	Other Related Audit Number	Description
11.	3.2.4		<p><b><u>Non-Conformance</u></b></p> <p>The health and safety responsibilities and accountabilities of the PCBU and the contractor(s) have not been clearly defined, allocated and communicated within the PCBU and to the contractor(s) and their workers.</p> <p><b><u>Recommendation</u></b></p> <p>HSWP 4: Health and Safety Roles and Responsibilities, is to be updated to include the health and safety responsibilities and accountabilities for contractors.</p>
12.	3.3.2	3.3.1	<p><b><u>Non-Conformance</u></b></p> <p>The PCBU does not consult with workers to identify their training needs in relation to performing their work activities safely.</p> <p><b><u>Recommendation</u></b></p> <p>A procedure that ensures training plans for positions at the Shire of Serpentine and Jarrahdale is to be developed. This procedure and is to include the consultation process to enable training plans for all job positions at the Shire of Serpentine Jarrahdale to be effectively developed.</p>
13.	3.3.3	3.3.4	<p><b><u>Non-Conformance</u></b></p> <p>Documented training plan(s) based on training needs have not been developed nor implemented for the Shire of Serpentine Jarrahdale.</p> <p><b><u>Recommendation</u></b></p> <p>Training plan templates exist however none have been completed for over 12 months. Process to be recommenced as per the new training procedure as detailed in 3.3.2. Training plans are possible utilising Litmos.</p>

# WHS Management System Review

No.	Audit Number	Other Related Audit Number	Description
14.	3.3.5		<p><b><u>Non-Conformance</u></b></p> <p>The PCBU has an induction program for all workers including management which is based on their likely risk exposure and provides relevant instruction in the PCBU's health and safety policy and health and safety procedures.</p> <p><b><u>Recommendation</u></b></p> <p>Inductions to provide information to all that enter a work area, the persons include visitors. Information that visitors require at a minimum is location of emergency exits, muster points and hazards that in the workplace.</p>
15.	3.3.10	3.3.4	<p><b><u>Non-Conformance</u></b></p> <p>The training needs analysis of all roles is not existent for the SSJ.</p> <p><b><u>Recommendation</u></b></p> <p>The HSE department to work with managers to review all positions in the Shire with the intent to determine the required training those positions require that will enable them to complete their tasks effectively and safely.</p>
16.	3.4.1	3.5.1, 3.5.3, 3.5.4	<p><b><u>Non-Conformance</u></b></p> <p>There is no process or procedure that covers the communication or consultation between employees and management, or between external parties and the SSJ with regards to health and safety aspects.</p> <p><b><u>Recommendation</u></b></p> <p>A communication and consultation procedure is to be developed that will include processes on communication, engagement with employees, engagement with regulatory bodies etc.</p> <p>Update HSWP4 Health and Safety Roles and Responsibilities, under the Health and Safety Committee section, feedback to the workforce is to be provided on Health and Safety matters.</p>



# WHS Management System Review

No.	Audit Number	Other Related Audit Number	Description
17.	3.4.2		<p><b><u>Non-Conformance</u></b> The workgroups represented on the HSE committee does not include Parks and Gardens, workshop, building maintenance, Waste Services, Rangers.</p> <p><b><u>Recommendation</u></b> A review of the current HSR list is to be undertaken to ensure all departments are represented and attend the HSE Committee meeting. This will allow safety items such as training, procedure changes and issues to be raised and discussed. Any changes to safety processes can then be known across the department.</p>
18.	3.5.2		<p><b><u>Non-Conformance</u></b> The PCBU regularly communicates to workers the progress towards the resolution of health and safety disputes.</p> <p><b><u>Recommendation</u></b> Update HSWP4 Health and Safety roles and responsibilities, under the Health and Safety Committee section, feedback to the workforce is to be provided on Health and Safety Matters.</p>
19.	3.6.6		<p><b><u>Non-Conformance</u></b> The 2019 annual report does not include any information regarding the WHS of the employees of the SSJ.</p> <p><b><u>Recommendation</u></b> Review the annual report process to include information regarding WHS at the SSJ.</p>
20.	3.7.2		<p><b><u>Non-Conformance</u></b> Specific instructions and safe work procedures associated with particular products, processes, projects or sites have not always been developed where appropriate.</p> <p><b><u>Recommendation</u></b> A review of the Shires departments for activities that require a SOP is to be undertaken, this is then to be compared against the available SOPs that currently exist, any gaps are then to be filled.</p>

# WHS Management System Review

No.	Audit Number	Other Related Audit Number	Description
21.	3.9.2		<p><b><u>Non-Conformance</u></b></p> <p>There is no document that provides a list of all risks that the employees of the Shire of Serpentine and Jarrahdale are exposed to during the execution of those activities.</p> <p><b><u>Recommendation</u></b></p> <p>Develop a High Level Risk Assessment that will contain all the activities of all departments which includes the associated hazards, risk of those hazards and the mitigation controls required to ensure a safe workplace.</p>
22.	3.9.3		<p><b><u>Non-Conformance</u></b></p> <p>The hazard identification, risk assessment and risk control process is undertaken by persons competent in the use of the PCBU's methodology.</p> <p><b><u>Recommendation</u></b></p> <p>A training package is to be developed that will improve SSJ's workforces' knowledge in hazard identification and risk management.</p>
23.	3.9.4		<p><b><u>Non-Conformance</u></b></p> <p>The PCBU documents all identified hazards, risk assessments and risk control plans.</p> <p><b><u>Recommendation</u></b></p> <p>Undertake a review of all plant and equipment available to SSJ staff and volunteers to conduct their activities, to ensure risk assessments have been undertaken and are provided to the workers who use the plant and equipment</p>

# WHS Management System Review

No.	Audit Number	Other Related Audit Number	Description
24.	3.9.5		<p><b><u>Non-Conformance</u></b></p> <p>Risks of identified hazards are assessed in consultation with workers having regard to the likelihood and consequence of injury, illness or incident occurring, taking into consideration:</p> <ul style="list-style-type: none"> <li>a) legal requirements</li> <li>b) evaluation of available information</li> <li>c) records of incidents, illness and disease</li> <li>d) potential for emergency situations.</li> </ul> <p><b><u>Recommendation</u></b></p> <p>A training package is to be developed that will improve SSJ's workforces' knowledge in hazard identification and risk management. The training package is to include the consultation process when developing risk assessments.</p>
25.	3.9.7		<p><b><u>Non-Conformance</u></b></p> <p>Hazard management methodology and associated procedures shall be reviewed and revised where necessary to ensure relevance, adequacy and compliance with health and safety management system requirements.</p> <p><b><u>Recommendation</u></b></p> <p>A document control procedure is required to process of whom to use to review and verify documentation.</p>
26.	3.9.8		<p><b><u>Non-Conformance</u></b></p> <p>There is no process or procedure that is available to use when a change is identified during a task and must be followed to complete the task.</p> <p><b><u>Recommendation</u></b></p> <p>Develop a "Management of Change" procedure that is to be used whenever there is a change identified with regards to organisation, safety or technical reasons.</p>

# WHS Management System Review

No.	Audit Number	Other Related Audit Number	Description
27.	3.10.1		<p><b><u>Non-Conformance</u></b></p> <p>The PCBU determines those areas where access controls are required and ensures effective controls are implemented and maintained.</p> <p><b><u>Recommendation</u></b></p> <p>High risk procedures are to be reviewed and updated to ensure they cover all aspects of the risk, worker involvement and mitigation controls needed to safely complete the activity. An overarching procedure "Permit to Work" is to be developed that looks at process of obtaining permits and the associated activities and controls needed (training, authorisation of permits, overlapping permits etc.)</p>
28.	3.10.9		<p><b><u>Non-Conformance</u></b></p> <p>There are procedures to ensure that materials and substances are disposed of in a manner that minimises risk of personal injury and illness.</p> <p><b><u>Recommendation</u></b></p> <p>A review is to be conducted on all hazardous waste products that poses a risk of personal injury or illness. Once known, a SOP is to be developed that contain specific guidelines in the method required to dispose of each waste type.</p>
29.	3.10.13		<p><b><u>Non-Conformance</u></b></p> <p>The PCBU ensures that hazardous chemicals are safely stored in accordance with legislative requirements.</p> <p><b><u>Recommendation</u></b></p> <p>A review of hazardous storage of all departments to ensure it as per the SDS guidelines and relevant Australian Standards and Dangerous Goods legislation.</p>
30.	3.10.14		<p><b><u>Non-Conformance</u></b></p> <p>No process or procedure in place to ensure permits are utilised correctly, the persons involved are trained in the issuing of permits and understand the controls/risks of the tasks associated.</p> <p><b><u>Recommendation</u></b></p> <p>Develop a Permit to Work Plan that is an overarching document that provides all users with all the information required to work with permits. Permits included are isolation, working at heights, excavation, confined space.</p>

# WHS Management System Review

No.	Audit Number	Other Related Audit Number	Description
31.	3.10.16	4.4.1	<p><b><u>Non-Conformance</u></b></p> <p>There is no process or procedure in place or available that ensures records of inspections, servicing, medical processes, audits, and other data that needs to be kept as per legislation and for insurance purposes.</p> <p><b><u>Recommendation</u></b></p> <p>Develop a record keeping procedure that details the requirements as per legislation on retaining records for the Shire.</p>
32.	3.10.20		<p><b><u>Non-Conformance</u></b></p> <p>Safety signs, for example, hazard, emergency information and fire signs, meet relevant standards and codes of practice and are displayed in accordance with legal and organisational requirements.</p> <p><b><u>Recommendation</u></b></p> <p>Review signage and provide information regarding the standard of signage required for activities undertaken by the SSJ</p>
33.	3.10.21		<p><b><u>Non-Conformance</u></b></p> <p>There is no process or procedure in place or available that ensures the transportation of hazardous substances or dangerous goods is undertaken as per legislative requirements. The process of correct storage and segregation is also not covered under available documentation.</p> <p><b><u>Recommendation</u></b></p> <p>Develop a Hazardous Substances and Dangerous Goods Plan for the Shire. This plan will include all facets of storage, handling and transportation of hazardous substances and dangerous goods.</p>
34.	3.10.23		<p><b><u>Non-Conformance</u></b></p> <p>The PCBU has a program to effectively manage the safety of workers when working at workplaces not under the control of the PCBU.</p> <p><b><u>Recommendation</u></b></p> <p>Although HSWP6 Workplace Inspection does mention supervisors having the requirement to complete inspections when workers are 'off-site', however there needs to be a more in-depth audit to determine the overall safety conditions that the worker will be working in and if it not acceptable the worker will not be placed.</p>

# WHS Management System Review

No.	Audit Number	Other Related Audit Number	Description
35.	3.11.1	3.11.2, 3.11.3	<p><b><u>Non-Conformance</u></b></p> <p>There is no emergency management plan in place or available that ensures all situations are covered, personnel understand their roles and the training for those roles are identified.</p> <p><b><u>Recommendation</u></b></p> <p>Review the current emergency management documentation available and develop a “Crisis Management Plan”. This plan will provide details on how to manage all expected emergencies within the Shire and the management of the emergency.</p>
36.	3.11.5		<p><b><u>Non-Conformance</u></b></p> <p>Emergency and fire protection equipment, exit signs and alarm systems are inspected, tested and maintained. Suitability, location and accessibility are reviewed if there has been a change in the workplace.</p> <p><b><u>Recommendation</u></b></p> <p>Review of each departments emergency response equipment to ensure that it is available, contents fully stocked and is in date.</p>
37.	4.1.1	5.1.1	<p><b><u>Non-Conformance</u></b></p> <p>There is no process or procedure in place or available that measures the shires HSE performance against the objectives and targets outlined in the SMP.</p> <p><b><u>Recommendation</u></b></p> <p>Develop a HSE performance procedure that reviews the objectives and targets for the Shire and ensures that these are met. This procedure is also to include involvement from the CEO and their management team to ensure a safe workplace. This could be in the form of monthly site inspection, review of documents, review of audits, review of high level incident investigations etc.</p>
38.	4.1.3		<p><b><u>Non-Conformance</u></b></p> <p>Engineering controls including safety devices are regularly inspected and tested (where appropriate) to ensure their integrity.</p> <p><b><u>Recommendation</u></b></p> <p>Vehicle and mobile plant prestart inspection forms are to be reviewed against plant and equipment. Any safety devices not listed on the form shall be highlighted and will trigger an update to the form.</p>



# WHS Management System Review

No.	Audit Number	Other Related Audit Number	Description
39.	4.1.4		<p><b><u>Non-Conformance</u></b></p> <p>No procedure or process available that defines that the monitoring of the workplace environment (general and personal) is to be undertaken where appropriate and records of the results are maintained.</p> <p><b><u>Recommendation</u></b></p> <p>A procedure is to be developed that considers all types of records and how they must be kept.</p>
40.	4.1.5		<p><b><u>Non-Conformance</u></b></p> <p>There is no process or procedure available or in use that ensures equipment used to perform or assist with safety processes (gas testing, hydration monitoring, lux levels etc) are inspected, test and calibrated as per their OEM.</p> <p><b><u>Recommendation</u></b></p> <p>Develop a procedure that includes processes that will ensure equipment that is used to perform safety functions (gas test, check noise levels etc.) are inspected and tested prior to use and are calibrated as per their OEM.</p>
41.	4.2.1		<p><b><u>Non-Conformance</u></b></p> <p>The PCBU has identified those situations where worker health surveillance should occur and has procedures to conduct this surveillance. The health of workers exposed to specific hazards is monitored, recorded, and reported, and action is taken to address any adverse effects.</p> <p><b><u>Recommendation</u></b></p> <p>Review the hazardous substances and dangerous goods that are in use within the SSJ activities for any health surveillance requirements. Use this information in developing an overall Occupational Health Management Plan that will also cover noise, ergonomics, RSI, etc.</p>
42.	4.5.1	4.5.2	<p><b><u>Non-Conformance</u></b></p> <p>There is no schedule in place or available that determines areas required to be inspected, by whom and when.</p> <p><b><u>Recommendation</u></b></p> <p>Establish a health and safety audit program that will review the safety performance of workplaces against the applicable PCBU safety procedures.</p>

# WHS Management System Review

No.	Audit Number	Other Related Audit Number	Description
43.	5.1.1		<p><b><u>Non-Conformance</u></b></p> <p>The PCBU has a health and safety management system review program to ensure the continuing suitability and effectiveness of the system. The review program is undertaken with senior management and officers and considers:</p> <ul style="list-style-type: none"> <li>• health and safety management system audit results</li> <li>• objectives, targets and performance indicators</li> <li>• changing circumstances</li> <li>• opportunities for continuous improvements.</li> </ul> <p><b><u>Recommendation</u></b></p> <p>Develop a procedure (Performance monitoring) that includes criteria reviewing the Safety Management Systems effectiveness and suitability for the SSJ.</p>

## Appendix A: Detailed Findings

### Element 1: Health and Safety Policy

#### 1.1 Health and Safety Policy

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

- a) the risk management process and ensure consistency with the nature of workplace activities and scale of health and safety risks
- b) comply with relevant health and safety legislation and other requirements placed upon the PCBU or to which the PCBU subscribes
- c) establish measurable objectives and targets for health and safety to ensure continuous improvement aimed at elimination of work-related illness and injury
- d) provision of appropriate health and safety training to all workers
- e) the consultation process to ensure all workers are included in decision-making where there is an impact on workplace health and safety
- f) the dissemination of health and safety information to all workers and visitors to the workplace
- g) effective implementation of the health and safety policy.

Finding:	Non-conformance
Evidence:	Council Policy 1.4.3 – Health and Safety (updated Nov 2017)
Comment:	
Observation:	Policy details the CEO is responsible for the implementation and management of the policy – not signed.
Non-conformance:	Policy does not mention any commitment to risk management processes.

# WHS Management System Review

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Contractor Health and Safety Handbook - HPRM# E12/1811</li> <li>2. Revised Health and Safety - Operations induction - Module 1</li> <li>3. <a href="https://www.sjshire.wa.gov.au/council/governance/local-laws-and-policies/policies.aspx">https://www.sjshire.wa.gov.au/council/governance/local-laws-and-policies/policies.aspx</a></li> </ol>
Comment:	<p>Policy is contained within the contract or health and safety handbook.</p> <p>Policy is contained within the Revised Health and Safety - Operations Induction</p> <p>Policy is available on the Shire website for anyone to access.</p>
Observation:	
Non-conformance:	

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Contractor Health and Safety Handbook - HPRM# E12/1811</li> <li>2. Revised Health and Safety - Operations induction - Module 1</li> <li>3. <a href="https://www.sjshire.wa.gov.au/council/governance/local-laws-and-policies/policies.aspx">https://www.sjshire.wa.gov.au/council/governance/local-laws-and-policies/policies.aspx</a></li> </ol>
Comment:	From past records, the document has been updated every 18-24 mths. The policy is approaching 4 years without formal review.
Observation:	Policy details the CEO is responsible for the implementation and management of the policy – not signed.
Non-conformance:	There is no documented procedure or process that is used to manage documents and keep them up to date.

## Element 2: Planning

### 2.1 Legal Requirements and Practical Guidance

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

Finding:	Non-conformance
Evidence:	HSWP4 Health and Safety Roles and Responsibilities
Comment:	HSWP4 Health and Safety Roles and Responsibilities outlines who is required to be kept up to date with current legislation, however it is not known who exactly has the responsibility of checking for updates and then ensuring that all employees are made aware of the changes and procedures and process are updated to reflect the change.
Observation:	There is no current process in place to manage Legislative compliance, there is a generic list to reference if needed that is not currently document controlled.
Non-conformance:	Non-Conformance - no known process of how this is done or who has the responsibilities to ensure the legislation is checked and then the changes communicated and processes updated.

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

Finding:	Non-conformance
Evidence:	1. SOP – Operating HIAB CM# E21/6190 2. SOP – Operating Pole Saw
Comment:	SOPs are risk assessments that do not have any direction of who is to do what (no responsibility or accountability). The hazards are too generic and do not explain the exact hazard. Industry Standards for SOP include all aspects of the role defining each step, in detail.  The SOP although are only Risk Assessments, they do contain current health and safety legislation etc.
Observation:	SOPs don't list required legislation – SOPs will need to have a section added that references applicable legislation for the task.  E126913 – OHS Work Procedures – This document offers section for listing references at the end of each procedure.
Non-conformance:	SOPs don't list required legislation – SOPs will need to have a section added that references applicable legislation for the task.

# WHS Management System Review

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

Finding:	Non-conformance
Evidence:	HSWP4 Health and Safety Roles and Responsibilities
Comment:	No procedure or process to check for legislation changes and to inform the workforce of any changes
Observation:	Workers request information from supervisors or HSE representatives. Workers will be being issued an iPad in future so they will be able to access. Changes to legislation are communicate via Grape Vine intranet, Notice boards, Safety alerts. Induction material requires updating to communicate how to access legislation.
Non-conformance:	No procedure or process in place to check for changes to legislation and to inform workforce of changes.

2.1.4 The PCBU and/or individual satisfy legal requirements to undertake specific activities, perform work or operate equipment, for example:

- a) licence
- b) certificate of competency
- c) notification
- d) registration
- e) approval/exemption
- f) other relevant requirements.

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Contractor Management (induction Manual)</li> <li>2. Health and Safety Requirements – Contractor checklist</li> <li>3. Several SOP's</li> <li>4. Occupational Health and Safety Work Procedures</li> <li>5. Safety Training and Competence Business Operating Procedure</li> <li>6. ACM register</li> </ol>
Comment:	<p>The contractor manual and documentation (induction) requires all tickets, VOCs etc be submitted as part of the process. This is also replicated for the shire under the Safety Training and Competence Behaviour Operating Procedure. SOP RA also contain legal requirements.</p> <p>The Health and Safety Strategic Plan contains information regarding training.</p>

# WHS Management System Review

Observation:	Currently there is a compliance register E128465 that manages all training and competencies. This is transitioning to OneComm System (HR Training module), this process will send notifications of training due.  They do have classified plant compliance is managed by the workshop department.
Non-conformance:	Training Matrix available via Litmos online program however not used. During field inspections it was noted that some departments were not able to produce evidence of SOP or VOC for high risk equipment. A procedure is to be developed that will detail the process the SSJ will undertake to ensure competency of their workers on plant and machinery.

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

Finding:	Non-conformance
Evidence:	HSWP4 Health and Safety Roles and Responsibilities
Comment:	HSWP4 Health and Safety Roles and Responsibilities outlines who is required to be kept up to date with current legislation, however it is not known who exactly has the responsibility of checking for updates and then ensuring that all employees are made aware of the changes and procedures and process are updated to reflect the change.
Observation:	There is no current process to capture this requirement.
Non-conformance:	Non-Conformance - no known process of how this is done or who has the responsibilities to ensure the legislation is checked and then the changes communicated, and processes updated.

## 2.2 Objectives and Targets

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

- legal requirements
- standards, codes and guidelines
- health and safety hazards and risks
- past health and safety performance (as defined by the PCBU's system requirements)
- technological developments
- leadership and worker participation.

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety – Safety Metric Report – June 2021</li> <li>2. HSWP4 Health and Safety Roles and Responsibilities</li> <li>3. Health and Safety – Site Safety Inspection – RCA 3 March 2021</li> </ol>
Comment:	<p>Site inspection procedure/template provides scope of council area to inspect.</p> <p>Health and Safety Strategic plan contains objectives however does not provide a target for each objective.</p>
Observation:	<p>There are Health and Safety Strategic Plan Actions and Targets document that is populated and managed. A current copy is required to review against HSEQ Policy. A report is developed by the HSE advisor that included feedback on objectives and targets.</p> <p>There is a monthly OHS Committee meeting that has a section "Positive Performance Indicators" that would be a good time to discuss the objectives/targets.</p>
Non-conformance:	Health and Safety Management plan is in draft, does not include the above criteria.

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety – Safety Metric Report – June 2021</li> <li>2. HSWP4 Health and Safety Roles and Responsibilities</li> <li>3. Health and Safety Strategic Plan – working copy</li> </ol>
Comment:	<p>Reviewed job descriptions - safety objectives and targets included.</p> <p>Workplace inspection procedure details the workplace inspection requirements for all levels of employees.</p> <p>The Health and Safety Strategic Plan contains information regarding objectives however the objectives have no targets.</p>
Observation:	<p>Nil responsibilities for managing Objectives &amp; Targets are documented to communicate individual responsibilities. There is no current documented procedure for managing the Objectives &amp; Targets however there are reports that include results of metrics that are included as objectives or targets</p>
Non-conformance:	



# WHS Management System Review

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

Finding:	Conformance
Evidence:	Health and Safety Strategic Plan – working copy
Comment:	Reviewed job descriptions- safety objectives and targets included, Workplace inspection procedure details the workplace inspection requirements for all levels of employees, The Health and Safety Strategic Plan contains information regarding objectives and targets.
Observation:	The WHS Strategic plan contains KPI however do not cover all aspects WHS Operational Plan in approval stage,
Non-conformance:	

## 2.3 Health and Safety Management Plans

2.3.1 In addition to defining how the PCBU will achieve its objectives and targets, the health and safety management plan(s):

- responds to legal requirements
- is based on an analysis of information relevant to the nature of the PCBU's activities, processes, products or services
- takes account of identified hazards and health and safety management systems failures
- aims to eliminate or reduce workplace illness and injury
- defines the PCBU's priorities
- sets timeframes
- allocates responsibility for achieving objectives and targets to relevant functional levels
- states how the plan will be monitored.

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>Contractor management (induction) manual (current)</li> <li>Occupational Health and Safety Work Procedures</li> <li>Council Policy 1.4.3 Health and Safety</li> <li>HSWP6 Workplace Inspection</li> <li>HSWP16 Safety Management Plan (SMP) High Risk Construction Work</li> </ol>
Comment:	<p>Monthly Reports indicate tracking of objectives/targets.</p> <p>Supporting documents are available, no overarching plan to tie it in.</p> <p>HSWP6 indicates the required number of inspections to undertake a year.</p> <p>The strategic plan contains information regarding listing objectives and targets.</p>

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Observation:	THE WHS Strategic plan contains minor sections that relate to the above criteria, however, the plan does not cover the majority aspects. WHS Operational Plan in approval stage.
Non-conformance:	Develop a safety management plan consistent with Shires activities and risks.

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Contractor management (induction) manual (current)</li> <li>2. Occupational Health and Safety Work Procedures</li> <li>3. Council Policy 1.4.3 Health and Safety</li> <li>4. HSWP6 Workplace Inspection</li> <li>5. HSWP16 Safety Management Plan (SMP) High Risk Construction Work</li> </ol>
Comment:	<p>Monthly Reports indicate tracking of objectives/targets.</p> <p>Supporting documents are available, no overarching plan to tie it in.</p> <p>HSWP6 indicates the required number of inspections to undertake a year.</p> <p>The strategic plan contains information regarding listing objectives and targets.</p>
Observation:	THE WHS Strategic plan contains minor sections that relate to the above criteria, however, the plan does not cover the majority aspects. WHS Operational Plan in approval stage.
Non-conformance:	Develop a safety management plan consistent with Shire's activities and risks.

2.3.3 Health and safety management plans are reviewed on a regular basis, to ensure they are kept up to date, and when there are changes to the PCBU's activities, processes, products or services.

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. WHS Operational Plan</li> <li>2. Health and Safety Management Plan (The Plan) (E12/8464)</li> </ol>
Comment:	<p>WHS Operational Plan in review.</p> <p>There is a safety management plan in use at the Shire. Contractors wanting to work at the Shire have the stipulation that they need a safety management plan approved prior to commencing work.</p>

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Observation:	Contractor Health and Safety Handbook E121811 – Document doesn't detail when review is required Safety Management Plans are provided by contractors and reviewed by Project Managers.  For high-risk works conducted by Shire workers – Construction Health and Safety Management Plan is developed E17751 – This is developed by project managers and reviewed by safety before implementation. Project manager communicates this plan to workers prior to works starting.
Non-conformance:	Document control procedure to be developed.

## Element 3: Implementation

### 3.1 Structure and Responsibility - Resources

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>Council Policy 1.4.3 – Health and Safety</li> <li>Revised Health and Safety – Operations Induction – Module 1 3.8.2021</li> <li>HSE Advisor Job Description</li> </ol>
Comment:	<p>Health and Safety Policy does not include resources being made available specifically for the roles of Health and Safety.</p> <p>A safety budget exists.</p> <p>Slide 11 of the Revised Health and Safety – Operations induction details the duties of the shire - "allows resources for employee training, instruction and supervision".</p>
Observation:	Budget exists.
Non-conformance:	

- 3.1.2 There are sufficient qualified and competent workers to implement the PCBU's health and safety management system as identified through documented review.

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>Council Policy 1.4.3 – Health and Safety</li> <li>Revised Health and Safety – Operations Induction – Module 1 3.8.2021</li> <li>HSE Advisor Job Description</li> </ol>
Comment:	<p>HR manages the Org charts, which includes Health and Safety.</p> <p>The HSE Advisor is currently completing a diploma in workplace health and safety. There are no current competencies for OHS.</p> <p>Health and Safety Reps receive 5-day training RTO.</p>

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Observation:	The desktop and field audits have identified areas of non compliance to established processes and areas where process are available and not updated or not available. The amount of work that is required to ensure an OHS system is compliant with State Legislation and is being utilised as intended is too much for one person to manage.
Non-conformance:	This role requires to be split in two, one role to look after documentation and to coordinate activities and the other to conduct field audits reviews and other field based OHS requirements.

## 3.2 Structure and Responsibility – Responsibility and Accountability

3.2.1 Senior management understands the PCBU's legal obligations for health and safety and can demonstrate how they fulfil them.

Finding:	Conformance
Evidence:	1. HSWP4 Health and Safety Roles and Responsibilities 2. Training plans (Litmos) of senior management
Comment:	HSWP4 – details the requirements for roles to have an understanding of the legal obligations pertained to HSE.
Observation:	Relevant training courses in LITMOS - senior management.
Non-conformance:	

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

Finding:	Conformance
Evidence:	1. Council Policy 1.4.3 – Health and Safety 2. HSWP4 Health and Safety Roles and Responsibilities
Comment:	The Chief Executive Officer is responsible as per the Health and Safety Policy and HSWP4.
Observation:	Health and Safety Policy not signed. EOF year audit report (accessed from the SSJ website) does not mention HSE.
Non-conformance:	

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP4 Health and Safety Roles and Responsibilities</li> <li>2. Incident Investigation Toolkit 2019</li> <li>3. Litmos Training programs</li> </ol>
Comment:	Reporting relationships identified in the incident investigation toolkit and in JD's.
Observation:	WHS Operational Plan PD's
Non-conformance:	

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Contractor Management (Induction) Manual</li> <li>2. Health and Safety Requirements – contractor checklist 2017</li> <li>3. HSWP4 Health and Safety Roles and Responsibilities</li> <li>4. HSWP19 Responsibilities of Designers and Main Contractors</li> <li>5. HSWP19(a) Checklist for Designers, Main Contractors and Commercial Clients</li> <li>6. BOP Manual – Contractor Management</li> </ol>
Comment:	HSWP4 does not include contractors in their roles and responsibilities Induction contains the requirements and responsibilities of contractors Contractor management procedure.
Observation:	
Non-conformance:	HSWP 4: Health and Safety Roles and Responsibilities, is to be updated to include the health and safety responsibilities and accountabilities for contractors.

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Contractor Health and Safety Handbook (induction)</li> <li>2. Health and Safety – Operations Induction – Manual 3</li> <li>3. Health and Safety – Operations Induction – Manual 4</li> <li>4. HSWP4 Health and Safety Roles and Responsibilities</li> <li>5. BOP Manual – Contractor Management</li> </ol>
Comment:	Site rules listed 16.1 of contractor health and safety handbook. Golden Rules of Safety included in module 3 of the induction. Roles and responsibilities listed in HSWP4 for employees Safety Metric reports are prepared monthly.
Observation:	<p>Major Contractors – E178297 Contractor Monthly Safety Indicator report. This is requested monthly from contractors.</p> <p>Shire HSE completes site inspection report E17784. Contractor Management BOP Within E17784 – Assessment results identify non-conformances, this is submitted to the contractor, PM and Shire Director for review.</p> <p>A contractor safety register is available to identify performance levels of contractors when planning/ assigning.</p>
Non-conformance:	

## 3.3 Structure and Responsibility – Training and Competency

### 3.3.1 The PCBU has a procedure for identifying and defining the health and safety training needs of workers.

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Contractor Management (induction) Manual</li> <li>2. Health and Safety Requirements – contractor checklist</li> <li>3. Revised Health and Safety – Operation induction – Module 1</li> <li>4. Safety Training and Competence Business Operating Procedure</li> </ol>
Comment:	<p>16.1 General site rules (Contractor Management Manual) details that contractors and their employees must be competent and appropriately qualified.</p> <p>Health and Safety Requirements – contractor checklist has a section “Certificates of competence (e.g. Worksafe high risk work licences)”.</p> <p>Slide 18 of the Revised Health and Safety – Operation induction – does not mention trained or competent personnel however does say follow all policies and procedures (Golden Rules page)</p>

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Observation:	
Non-conformance:	A procedure that ensures training plans for positions at the Shire of Serpentine Jarrahdale is to be developed. This procedure is to include the consultation process to enable training plans for all job positions at the Shire of Serpentine Jarrahdale to be developed.

## 3.3.2 The PCBU consults with workers to identify their training needs in relation to performing their work activities safely.

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Safety Training and Competence BOP</li> <li>2. HSWP4 Health Safety Roles and Responsibilities</li> <li>3. E121811 – Contractor health and safety handbook</li> <li>4. E12/1182 Safety Communication Plan template</li> </ol>
Comment:	<p>Safety Training and Competence BOP does not indicate if the PCBU consults with workers to identify their training needs.</p> <p>E121811 – Contractor health and safety handbook has no consultation requirements</p> <p>Responsibilities of Health and Safety Representatives – duty of consult and cooperate with the employer on training and safety matters.</p>
Observation:	<p>HSC committee communicates between management and employees.</p> <p>No documented process for identifying training needs with new hires – this is all verbal at the moment. There is a recruitment application or request for a recruitment form. This will need to be followed up with HR.</p> <p>Fortnightly Contractor Meetings are held by the Project Manager.</p>
Non-conformance:	A procedure that ensures training plans for positions at the Shire of Serpentine Jarrahdale is to be developed. This procedure and is to include the training plans for all job positions at the Shire of Serpentine Jarrahdale.

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Contractor Management (induction) Manual</li> <li>2. Health and Safety Requirements – contractor checklist</li> <li>3. Revised Health and Safety – Operation induction – Module 1</li> <li>4. Safety Training and Competence Business Operating Procedure</li> </ol>
Comment:	The Safety Training and Competence BOP describes the requirements for working in the Shire.

Observation:	No there is no documented process to meet this criterion. Draft Work health and Safety Training Plan is under development - E20/12574 – This is a suggested action in the operational health and safety plan that is currently under review. Training Matrix to be developed in line with the new OneComm – HR department is managing this. There are Job dictionaries for some department jobs that detail training requirements – Refer Parks_and_Gardens_Arborist.pdf
Non-conformance:	Training plan templates exist however none have been completed for over 12 months. Process to be recommenced as per the NEW training procedure as detailed in 3.3.2.

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Contractor Management (induction) Manual</li> <li>2. Health and Safety Requirements – contractor checklist</li> <li>3. Revised Health and Safety – Operation induction – Module 1</li> <li>4. Safety Training and Competence Business Operating Procedure</li> </ol>
Comment:	Safety training and competence business operating procedure outlines the process for this criteria.
Observation:	During field inspections it was identified that several areas (Maintenance, waste services) identified training issues.
Non-conformance:	Training plan templates exist however non have been completed for over 12 months. Process to be recommenced as per the NEW training procedure as detailed in 3.3.2. Training plans are possible utilising existing online software – “Litmos”.

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Contractor Management (induction) Manual</li> <li>2. Health and Safety Requirements – contractor checklist</li> <li>3. Revised Health and Safety – Operation induction – Module 1</li> <li>4. Safety Training and Competence Business Operating Procedure</li> <li>5. BOP - Safety and Health induction</li> </ol>
Comment:	The following were not discussed or mentioned in the induction training slides - communication and consultation, risk assessment, working at height, asbestos, emergency response, confined spaces, permit to work, excavation, working on or near water, and working with moving powered plant.



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Observation:	No induction process identified for visitors at waste services No induction orientation for workers at Maintenance team.
Non-conformance:	Inductions provide information to all that enter a work area, the persons may be workers or visitors. Information that visitors require at a minimum is location of emergency exits, muster points and hazards that in the workplace.

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

Finding:	Non-conformance
Evidence:	1. Safety Training and Competence BOP
Comment:	Safety training and competence BOP gives the HSE advisor the responsibility to verify all training resources prior to implementation, however this is too vague. This procedure needs to specifically mention the requirements of the trainer have TAFE Cert IV and have relevant qualifications in the training they deliver.
Observation:	Safety advisor must approve all training material – Peer reviews from coordinator. There is no current process to confirm External Trainers competencies are being confirmed prior to training. They do only utilise a RTO. Internal training is completed by persons with appropriate experience, nil process documents this requirement. Training feedback forms are completed -to monitor internal training quality, and to monitor external RTOs.
Non-conformance:	Update training and competence BOP to include trainer qualifications and the need to have Cert IV in training and assessing.

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

Finding:	Conformance
Evidence:	1. Safety Training and Competence BOP 2. Safe Operating Procedure (Operate Front End Loader (FEL))
Comment:	Safety Training and Competence BOP details workers to be trained and competent in their task Safe Operating Procedures have a section included on the front page that identified the licences/qualifications and training required to be able to conduct the task.  Yes, there is a RTW and Injury Management Procedure. There is a TRW plan for Covid – Refer Health and Safety - Risk Assessment - returning to work post COVID-19.doc
Observation:	Reviewed copy of advertisement for a Supervisor in Facilities Management.
Non-conformance:	

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Safety Training and Competence BOP</li> <li>2. HSWP4 Health and Safety Roles and Responsibilities.</li> <li>3. Copies of Litmos completed training for management personnel</li> </ol>
Comment:	Managers should be doing Litmos inductions; there is no current process for recording Management Training in required procedures and or responsibilities. There are records within Litmos that identified key management have not having completed the inductions.
Observation:	Director: Refer screen shot of Litmos training records to show management are attending / passing courses.
Non-conformance:	

3.3.9 Those representing the PCBU and the worker(s) on health and safety matters, including representatives on consultative committee(s), receive appropriate training to enable them to undertake their duties effectively.

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Safety Training and Competence BOP.</li> <li>2. HSWP4 Health and Safety Roles and Responsibilities.</li> <li>3. Occupational Health and Safety Committee Meeting Minutes 21 July 2021.</li> </ol>
Comment:	<p>HSWP4 responsibilities Health and Safety Committee indicate the members are to remain informed as to current relevant legislation, codes of practice, Australian standards and comparable industry standards through communication, education and training.</p> <p>21 July HSE Committee meeting identifies training being organised for HSR.</p>
Observation:	There are internal training sessions completed by Health and Safety as identified as required. They are produced when there is need identified. Managers/ Supervisors determine what and who needs internal training. HIRAC outcomes also trigger if internal training is required. A training register is completed to evidence what training has been completed, once completed the training evaluation form is provided to the trainees to gain feedback.
Non-conformance:	

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Contractor Management (induction) Manual</li> <li>2. Health and Safety Requirements – contractor checklist</li> <li>3. Revised Health and Safety – Operation induction – Module 1</li> <li>4. Safety Training and Competence Business Operating Procedure</li> </ol>
Comment:	The Safety Training and Competence BOP describes the requirements for working in the Shire.
Observation:	There is no current document that identifies what training each worker requires and any retraining schedule.
Non-conformance:	Training Needs Analysis to be developed.

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Contractor Management (induction) Manual</li> <li>2. Health and Safety Requirements – contractor checklist</li> <li>3. Revised Health and Safety – Operation induction – Module 1</li> <li>4. Safety Training and Competence Business Operating Procedure</li> </ol>
Comment:	Internal training is developed when identified, a formal training needs analysis has not been developed, the new OneComm process will ensure that the training analysis is developed – There is no current process in place to review/ revise the training analysis.
Observation:	Safety training and compliance plan in draft.
Non-conformance:	Document control procedure to be developed.

## 3.4 Consultation, Communication and Reporting – Consultation

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

- a) health and safety matters
- b) health and safety issues
- c) any proposed changes to the work environment, processes, practices or purchasing decisions that impact on their health and safety.

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP4 Health and Safety Roles and Responsibilities</li> <li>2. E09/0457 - Health and Safety Committee TOR</li> </ol>
Comment:	<p>Role of the health and safety committee is to facilitate consultation and corporation between management and employees.</p> <p>HSR forms submitted to Worksafe.</p>
Observation:	Approx. 20 people on the safety committee – only half attend regularly.
Non-conformance:	A communication and consultation procedure to be developed.

3.4.2 The PCBU has:

- a) in consultation with workers, determined the number of work groups and HSRs required to effectively represent all workers
- b) made arrangements to allow the workers to select those who will represent them on health and safety matters
- c) communicated the consultative arrangements to workers, including names of their worker and employer representatives for health and safety matters.

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP4 Health and Safety Roles and Responsibilities</li> <li>2. E09/0457 - Health and Safety Committee TOR</li> <li>3. BOP – OSH Representation Election</li> </ol>
Comment:	There is a procedure on the roles and responsibilities for HS committee and the members.
Observation:	The workgroups represented on the HSE committee does not include Parks and Gardens, workshop, building maintenance, Waste Services, Rangers
Non-conformance:	A review of the current HSR list is to be undertaken to ensure all departments are represented and attend the HSE Committee meeting. This will allow safety items such as training, procedure changes and issues to be raised and discussed. Any changes to safety processes can then be known across the department.

## 3.4.3 Those who represent workers on health and safety matters:

- a) are provided time and resources to effectively undertake this role
- b) meet regularly with management about health and safety issues and the minutes of their meetings are available to all workers.

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP4 Health and Safety Roles and Responsibilities</li> <li>2. HSWP6 Workplace Inspection</li> <li>3. Safety Training and Competence Business Operating Procedure</li> <li>4. E090457 - Health and safety committee TOR</li> <li>5. July 2021 HSE Committee meeting minutes</li> </ol>
Comment:	<p>Evidence of HSR conducting inspections etc. Schedule of meetings (dates/times).</p> <p>HSWP6 Workplace Inspection details the HSR may accompany and participate with workplace inspection.</p> <p>Safety Training and Competence BOP – details HSR training requirement.</p>
Observation:	Confirmation from People, Development and Wellbeing Manager that HSE committee meeting minutes are available from the Shires intranet for all staff.
Non-conformance:	

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP4 Health and Safety Roles and Responsibilities</li> <li>2. HSWP6 Workplace Inspection</li> <li>3. Safety Training and Competence Business Operating Procedure</li> <li>4. E090457 - Health and safety committee TOR</li> <li>5. Several BOPS</li> </ol>
Comment:	SOP's have input from workers involved.
Observation:	
Non-conformance:	

## 3.5 Consultation, Communication and Reporting – Communication

3.5.1 The PCBU's health and safety policy and other relevant information on health and safety is communicated to all workers and consider language and standards of literacy.

Finding:	Non-conformance
Evidence:	HSWP4 Health and Safety Roles and Responsibilities
Comment:	<p>Toolbox meetings.</p> <p>Last dot point in the responsibilities of health and safety representatives' states "Liaise with employees on safety matters".</p> <p>First dot point of responsibilities health and safety committee "Facilitate consultation and corporation between management and employees to ensure the smooth operation of the safety management process.</p>
Observation:	The roles and responsibilities of the health and safety committee does not include providing feedback to the workforce.
Non-conformance:	<p>Develop communication and consultation procedure.</p> <p>Update HSWP4 Health and Safety roles and responsibilities, under the Health and Safety Committee section, feedback to the workforce is to be provided on Health and Safety Matters.</p>

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP4 Health and Safety roles and responsibilities</li> <li>2. BOP - E191775 BOP – Health and safety Issue resolution</li> <li>3. E090457 - Health and safety committee TOR</li> <li>4. BOP - Health and Safety Issue Resolution</li> </ol>
Comment:	<p>Toolbox/ HSR meeting minutes.</p> <p>Last dot point in the responsibilities of health and safety representatives' states "Liaise with employees on safety matters" third last dot point states "refer unresolved health and safety matters to the health and safety committee".</p>
Observation:	Health and Safety Committee Minutes does not have a section for OHS issues nor does it have an action list.
Non-conformance:	<p>Update HSWP4 Health and Safety roles and responsibilities, under the Health and Safety Committee section, feedback to the workforce is to be provided on Health and Safety Matters.</p>

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Contractor Management (induction Manual)</li> <li>2. Health and Safety Requirements – contractor checklist</li> <li>3. Contractor health and safety management business operating procedure</li> <li>4. Council policy 1.4.3 Health and Safety</li> <li>5. HSPW4 Health and Safety Roles and Responsibilities</li> </ol>
Comment:	<p>JD`s include safety requirements.</p> <p>Contractor meetings that include health and safety discussions.</p> <p>Council health and safety policy does not refer to groups outside employees.</p>
Observation:	<p>Safety and Wellbeing Advisor develop the safety alerts as determined – by Trending analysis, Industry changes, similar industry safety notices, incident outcomes etc – There is no formal process to identify when and why they are required to be completed. This sent Via email to the supervisors, these are supposed to be displayed on notice boards in departments that the alert is relevant to.</p>
Non-conformance:	Develop a communication and consultation procedure.

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP4 – health and safety roles and responsibilities</li> <li>2. BOP - E191775 BOP – Health and safety Issue resolution</li> </ol>
Comment:	<p>JD`s include safety requirements.</p> <p>Contractor meetings that include health and safety discussions.</p> <p>Council health and safety policy does not refer to groups outside employees.</p>
Observation:	<p>Informal issues reported to safety are assessed for severity, if deem appropriate they shall be managed within the incident processes. This is not currently documented, a good recommendation.</p> <p>Report an Issue link on the shire of <a href="http://www.sjshire.wa.gov.au">www.sjshire.wa.gov.au</a> is received by administration and forwarded to appropriate persons department.</p>
Non-conformance:	Update E191775 BOP - Health and safety issue resolution to include issues raised by external parties.

## 3.6 Consultation, Communication and Reporting – Reporting

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

Finding:	Conformance
E Finding:	<ol style="list-style-type: none"> <li>1. HSWP4 Health and Safety Roles and Responsibilities</li> <li>2. Revised health and safety operations induction</li> <li>3. Incident Investigation toolkit 2019</li> <li>4. Reporting requirements procedure</li> <li>5. Health and Safety Incident Investigation - Jarrahdale Rd powerline</li> </ol>
Comment:	<p>Potential and actual hazards and accidents/incidents to their supervisor and/or health and safety representatives within a specified timeframe (3rd last bullet point).</p> <p>Golden rules slide 18 indicates 2nd bullet point “report any injury, incident, injuries”</p> <p>*Risk management not included in induction (revised)</p> <p>Incident investigation toolkit contains information regarding reporting incidents/hazards.</p>
Observation:	<p>Incidents are managed within OneComm Safety, Incident INC-0000141 - Reported by the person who had the incident / filled out incidents are then sent to their line manager who completes the rest of their report. Once it's completed its referred to the safety team to review.</p> <p>Incident investigations are conducted using E191790 first then E21/2781.</p>
Non-conformance:	

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP4 Health and Safety Roles and Responsibilities</li> <li>2. Revised health and safety operations induction</li> <li>3. Incident Investigation toolkit 2019</li> <li>4. Business Operating Procedure BOP - Reportable Incidents - Regulatory Authorities – Revised</li> </ol>
Comment:	<p>Potential and actual hazards and accidents/incidents to their supervisor and/or health and safety representatives within a specified timeframe (3rd last bullet point).</p> <p>Golden rules slide 18 indicates 2nd bullet point “report any injury, incident, injuries”</p> <p>*Risk management not included in induction (revised)</p> <p>Incident investigation toolkit contains information regarding reporting incidents/hazards.</p>



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Observation:	Incidents are managed within OneComm Safety, Incident INC-0000141 - Reported by the person who had the incident / filled out incidents are then sent to their line manager who completes the rest of their report. Once it's completed its referred to the safety team to review.  Incident investigations are conducted using E191790 first then E21/2781.
Non-conformance:	

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP4 Health and Safety Roles and Responsibilities</li> <li>2. HSWP6 Workplace Inspection</li> <li>3. Incident Investigation Toolkit 2019</li> <li>4. Health, Safety and Wellbeing report 2019-2020</li> <li>5. Health and Safety Metric Report Jan/Feb 2021</li> </ol>
Comment:	<p>HSWP4 has within roles that the role has responsibility of ensuring incidents are investigated and actions assigned.</p> <p>Workplace inspections are conducted, if there are corrective actions they are recorded within the inspection, the workplace inspection is then provided to the person responsible for the area that was inspected.</p>
Observation:	Safety Advisor is responsible for completing Contractor workplace inspections – These are completed once per month, every contractor each month. Once completed and corrective actions are identified/ the report is distributed to Shire Senior management and project teams, and the contractor to close out the corrective actions. Once corrected/ closed out the form is returned to safety. Completed reports are filed individually, non conformances are not recorded in a single location.
Non-conformance:	

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP4 Health and Safety Roles and Responsibilities</li> <li>2. Health and Safety inspection/performance report</li> <li>3. Health and Safety – Safety Metric Report – June 2021</li> <li>4. Health, Safety and Wellbeing report 2019-2020</li> <li>5. Health and Safety Metric Report Jan/Feb 2021</li> </ol>

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Comment:	Reports are being conducted monthly and they are sent to the OHS committee The Safety Metric Report is submitted monthly.
Observation:	Health and Safety and Wellbeing Annual Report 2019-2020 - This is submitted annually Monthly HSEC reports produced and distributed. HSE Committee Meeting reviews reports.
Non-conformance:	

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP4 Health and Safety Roles and Responsibilities</li> <li>2. Health and Safety inspection/performance report</li> <li>3. Health and Safety – Safety Metric Report – June 2021</li> <li>4. 3 steps to safety audit</li> <li>5. HSE Committee Meeting Minutes - 21 July 2021</li> </ol>
Comment:	Reports being conducted monthly. Health, Safety and Wellbeing report 2019-2020 Health and Safety Metric Report Jan/Feb 2021.
Observation:	HSWP4 responsibilities of HSE Committee review audits and reviews. 3rd party audits are being completed and reviewed by PCBU.
Non-conformance:	

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

Finding:	Non-conformance
Evidence:	2019 annual report
Comment:	2019 annual report doesn't include HS performance
Observation:	
Non-conformance:	Review the annual report process to include information regarding WHS @ the SSJ

## 3.7 Documentation

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Council Policy 1.4.3 – Health and Safety</li> <li>2. Occupational Health and Safety work procedures</li> </ol>
Comment:	The plans and policies are in a logical order and include the necessary sections The SOP's in use do not follow a set format.
Observation:	No document control procedure.
Non-conformance:	A document control procedure is required to establish templates for each document type used.

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety – Safe operating procedure – operation of pole saw</li> <li>2. Health and Safety – Safe operating procedure – Tree Planting</li> <li>3. Health and Safety – Safe Operating Procedure – Hazardous Chemical Storage Guide</li> </ol>
Comment:	<p>Safe Operating Procedures have been developed for specific tasks such as Hiab operation, operation of pole saw.</p> <p>The SOP's are only risk assessments, some instruction on criteria (PPE, training etc.) no roles responsibilities, no procedure process</p>
Observation:	<p>E16/8163 SOP Roller operation - This SOP contains roles and responsibilities. There is an inconsistency on the information contained within the SOP, a document control procedure could identify a list of required information.</p> <p>Field Audits identified sites (maintenance, waste services, parks and gardens) did not have access to SOPs or had activities that were captured by a SOP</p>
Non-conformance:	A review of the Shire's departments for activities that require a SOP is to be undertaken, this is then to be compared against the available SOPs that currently exist, any gaps are then to be filled.

## 3.8 Document and Data Control

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

Finding:	Non-conformance
Evidence:	No evidence available.
Comment:	No document control procedure.
Observation:	A document control procedure is required to establish templates for each document type used.
Non-conformance:	A document control procedure is to be developed.

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

Finding:	Non-conformance
Evidence:	No evidence available.
Comment:	No document control procedure.
Observation:	A document control procedure is required to establish guidelines when developing documents.
Non-conformance:	A document control procedure is to be developed.

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

Finding:	Conformance
Evidence:	
Comment:	Training identified in the induction that will assist workers with this Information contained with induction regarding websites to use.
Observation:	Intranet has locations where personnel can access information Noticeboards contain HSE information.
Non-conformance:	

# WHS Management System Review

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

Finding:	Non-conformance
Evidence:	No evidence available.
Comment:	A document control procedure is required to process of whom to use to review and verify documentation.
Observation:	
Non-conformance:	A document control procedure is to be developed.

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

Finding:	Non-conformance
Evidence:	No evidence available.
Comment:	A document control procedure is required to process of whom to use to review and verify documentation.
Observation:	
Non-conformance:	A document control procedure is to be developed.

## 3.9 Health and Safety Risk Management Program

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety – SOP - Various</li> <li>2. HSWP13 – Safe Work Method Statement</li> <li>3. HSWP6 – Workplace inspections</li> <li>4. HSWP4 – Health and Safety Roles and Responsibilities</li> <li>5. BOP - OSH Risk Management</li> </ol>
Comment:	<p>HSPW13 Safe Work Method Statement mentions the hierarchy of controls.</p> <p>Workplace inspection provides methods to ensure workplace risk/hazard are identified HSWP4 Roles and Responsibilities identify requirements to complete inspections, investigation incidents and hazards.</p> <p>SOPs – Various – contain risk assessments.</p>
Observation:	
Non-conformance:	

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety – SOP - Various</li> <li>2. HSWP13 – Safe Work Method Statement</li> <li>3. HSWP6 – Workplace inspections</li> <li>4. HSWP4 – Health and Safety Roles and Responsibilities</li> <li>5. BOP - OSH Risk Management</li> </ol>
Comment:	<p>HSPW13 Safe Work Method Statement mentions the hierarchy of controls</p> <p>Workplace inspection provides methods to ensure workplace risk/hazard are identified HSWP4 Roles and Responsibilities identify requirements to complete inspections, investigation incidents and hazards</p> <p>SOPs – Various – contain risk assessments</p>
Observation:	<p>Field audits have identified there was no overarching risk assessment for the waste facility, workshop and Rangers' departments.</p> <p>No risk register available or exists.</p>
Non-conformance:	Develop a risk register that incorporates all aspects and activities of the SSJ

# WHS Management System Review

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Contractor Management (induction) Manual</li> <li>2. Health and Safety Requirements – contractor checklist</li> <li>3. Revised Health and Safety – Operation induction – Module 1</li> <li>4. Safety Training and Competence Business Operating Procedure</li> <li>5. BOP - OSH Risk Management</li> </ol>
Comment:	<p>Training matrix available in Litmos however not used.</p> <p>There is no formal process to train people as they are onboarded. induction has a module on hazards, revised induction does not.</p>
Observation:	Field audits identified varying levels of risk management from good to poor. A worker that was working in the rain did not include wet weather as a hazard for example.
Non-conformance:	A training package is to be developed that will improve SSJ's workforces' knowledge in hazard identification and risk management.

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Contractor Management (induction) Manual</li> <li>2. Health and Safety Requirements – contractor checklist</li> <li>3. SOP Various – contain risk assessments</li> <li>4. BOP - Risk Management</li> </ol>
Comment:	<p>induction has a module on hazards, revised induction does not</p> <p>Chem Alert use for health risk assessments on hazardous substances</p>
Observation:	<p>Risks are documented on JHA/RA templates SWMS for tasks are developed</p> <p>Field audits identified that not all plant had risk assessments completed</p>
Non-conformance:	A review of all plant and equipment that SSJ have to conduct their activities to ensure risk assessments have been conducted and are known to the workers who use the plant and equipment

# WHS Management System Review

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

- a) legal requirements
- b) evaluation of available information
- c) records of incidents, illness and disease
- d) potential for emergency situations.

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety – SOP – Various</li> <li>2. Health and Safety – SOP – Operations induction 1 - 4</li> <li>3. Health and Safety Strategic Plan working copy 2020-2025</li> <li>4. HSWP4 Health and Safety Roles and Responsibilities</li> <li>5. BOP - OSH Risk Management</li> </ol>
Comment:	<p>HSPW4 includes roles such as ensuring a safe workplace, conduct good consultation, mandate training and awareness etc. however it does not include ensuring risks and hazards on site are identified prior to commencing works and controls put in place.</p> <p>induction has a module on hazards, revised induction does not.</p>
Observation:	<p>Workers in the field had Take 5's completed.</p> <p>SOP risks are graded by likelihood and consequence.</p>
Non-conformance:	A training package is to be developed that will improve SSJ's workforces' knowledge in hazard identification and risk management. The training package is to include the consultation process when developing risk assessments.

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety – SOP various</li> <li>2. BOP - OSH Risk Management</li> <li>3. BOP - Contractor Management</li> <li>4. BOP - Risk Management</li> </ol>
Comment:	The SOP RA have a matrix that has likelihood and consequence induction has a module on hazards, revised induction does not.
Observation:	Field audits reviewed risk assessment and controls were implemented.
Non-conformance:	



# WHS Management System Review

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

Finding:	Conformance
Evidence:	HSE Advisor Job Description
Comment:	A document control procedure is required to process of whom to use to review and verify documentation.
Observation:	
Non-conformance:	A document control procedure is to be developed.

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

Finding:	Non-conformance
Evidence:	No evidence available or exists
Comment:	No Management of Change procedure exists.
Observation:	
Non-conformance:	Management of Change procedure to be developed.

## 3.10 Hazard Identification, Risk Assessment and Control of Risks

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP1 Electrical Safety</li> <li>2. HSWP12 – Hot work and Confined Spaces</li> <li>3. HSWP15 – Asbestos Management</li> <li>4. HSWP16 Safety Management Plan (SMP) High Risk Construction Work</li> <li>5. HSWP17 Confined space entry</li> </ol>
Comment:	<p>HSWP1 Electrical Safety does not go into enough details regarding restrictions on those personnel that are not electricians – i.e. locked distribution boards etc.</p> <p>HSWP12 – Hot work and Confined Space does not go into enough details regarding restrictions on who can enter those areas and what the requirements are HSWP17 Confined Space Entry does not include training required prior to entering a confined space, spotters or atmospheric testing.</p>
Observation:	No overarching Permit to Work procedure.
Non-conformance:	High risk procedures are to be reviewed and updated to ensure they cover all aspects of the risk, worker involvement and mitigation controls needed to safely complete the activity. An overarching procedure “Permit to Work” is to be developed that looks at process of obtaining permits and the associated activities and controls needed (training, authorisation of permits, overlapping permits etc.)

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety Purchasing hazardous substances</li> <li>2. HSWP19 Responsibilities of Designers and Main Contractors</li> <li>3. Business Operating Procedure - Hazardous substances</li> <li>4. BOP - Service and supplier selection</li> <li>5. BOP - OSH Purchasing and hire</li> </ol>
Comment:	There is a basic one page process of things to consider before purchasing hazardous chemicals HSWP19 includes design to be RA and a report provided regarding hazards/risks and potential for harm etc.
Observation:	
Non-conformance:	

# WHS Management System Review

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety Requirements - contractor checklist</li> <li>2. Contractor Management Induction Manual</li> <li>3. Business Operating Policy - Contractor Health and Safety Management</li> <li>4. BOP - Service and supplier selection</li> </ol>
Comment:	Contractor checklist used to qualify contractors HSE performance prior to approving job.
Observation:	
Non-conformance:	

3.10.4 Temporary workers health and safety performance is monitored and reviewed to ensure continued adherence to the PCBU's health and safety requirements or specifications.

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety Requirements - contractor checklist</li> <li>2. Contractor Management Induction Manual</li> <li>3. Business Operating Policy - Contractor Health and Safety Management</li> <li>4. BOP - contractor management</li> <li>5. HSWP 6 inspections</li> </ol>
Comment:	
Observation:	Evidence of inspections conducted on contractors in the field
Non-conformance:	

3.10.5 The PCBU determines their health and safety requirements prior to the purchase of goods and communicates those specifications to the supplier.

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety Requirements - contractor checklist</li> <li>2. Contractor Management Induction Manual</li> <li>3. Business Operating Policy - Contractor Health and Safety Management</li> <li>4. BOP - Service and supplier selection</li> <li>5. BOP - OSH Purchasing and hire</li> </ol>
Comment:	Information sent to supplier as part of tender process
Observation:	
Non-conformance:	

# WHS Management System Review

3.10.6 Procedures shall be established and implemented for verifying that purchased goods conform to health and safety requirements and address discrepancies before the goods are put into operational use.

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety Requirements - contractor checklist</li> <li>2. Contractor Management Induction Manual</li> <li>3. Business Operating Policy - Contractor Health and Safety Management</li> <li>4. BOP - Service and supplier selection</li> <li>5. BOP - OSH Purchasing and hire</li> </ol>
Comment:	
Observation:	Procedure is available that covers purchasing and hire
Non-conformance:	

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety – SOP - Various</li> <li>2. HSWP13 – Safe Work Method Statement</li> <li>3. HSWP6 – Workplace inspections</li> <li>4. HSWP4 – Health and Safety Roles and Responsibilities</li> <li>5. BOP - OSH purchasing and hire</li> </ol>
Comment:	BOP - Purchasing and risk assessment of new plant or equipment BOP - OSH Risk Management
Observation:	Part of contractor's deliverables for works on SSJ.
Non-conformance:	

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Business Operating Policy - Contractor Health and Safety Management</li> <li>2. BOP - OSH Risk Management</li> </ol>
Comment:	Purchasing procedure Contractor deliverables.
Observation:	Part of tender evaluation.
Non-conformance:	

# WHS Management System Review

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

Finding:	Non-conformance
Evidence:	
Comment:	
Observation:	Field audit identified there was no SOP for disposing of SHARPS.
Non-conformance:	A review is to be conducted on all hazardous waste products that poses a risk of personal injury or illness. Once known, a SOP is to be developed that contain specific guidelines in the method required to dispose of each waste type.

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP6 Workplace Inspection</li> <li>2. Health and Safety – Site Safety Inspection - RCA</li> <li>3. BOP - OSH risk management</li> </ol>
Comment:	Site safety inspection has information regarding amenities and facilities Evidence of site safety inspections completed
Observation:	Inspections completed on contractor includes the above criteria
Non-conformance:	

# WHS Management System Review

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and safety – Hazardous chemicals storage guide</li> <li>2. Revised health and safety – safety induction – Module 4</li> <li>3. BOP - Hazardous Substances</li> </ol>
Comment:	Health and Safety – Hazardous chemicals storage guide is not adequate. The induction has information that would satisfy basic training
Observation:	<p>There is a training program that all workers must completed. Its completed through an RTO.</p> <p>Chem watch - SDS must be requested, Hard copy is at point of storage. Chem watch sends notification. It will be accessible on iPad, hard copies will not be required shortly.</p>
Non-conformance:	

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

Finding:	Conformance
Evidence:	Revised health and safety – safety induction – Module 4
Comment:	Induction slide mentioned the council has access to chem alert Shire has a dedicated HSE advisor.
Observation:	Chem watch - SDS must be requested, hard copy at point of storage. Chem watch sends notification. It will be accessible on iPad, hard copies will not be required shortly.
Non-conformance:	

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and safety – Hazardous chemicals storage guide</li> <li>2. Revised health and safety – safety induction – Module 4</li> <li>3. HSPW6 Health and Safety – Workplace inspection</li> <li>4. Health and Safety – Site Safety Inspection</li> <li>5. BOP - Hazardous substances</li> </ol>
Comment:	Health and Safety – Hazardous chemicals storage guide is not adequate. The induction has information that would satisfy basic training Site safety

# WHS Management System Review

Observation:	<p>There is a training program that all workers must completed. It's completed through an RTO.</p> <p>Chem watch - SDS must be requested, Hard copy s at point of storage. Chem watch sends notification. It will be accessible on iPad, hard copies will not be required shortly.</p> <p>Field inspections noted on several occasions hazardous substances stored incorrectly.</p>
Non-conformance:	A review of hazardous storage of all departments to ensure it as per the SDS guidelines and relevant Australian Standards and Dangerous Goods legislation.

## 3.10.14 The PCBU permit to work procedures are available for use when required.

Finding:	Non-conformance
Evidence:	
Comment:	No PTW procedure available.
Observation:	
Non-conformance:	Permits discussed in confined space, hot works and excavation procedures.

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety SOPs- Various</li> <li>2. Health and Safety – Operations – Induction module 1</li> <li>3. E121811 – Contractor handbook Appendix D HSWP23 PPE.</li> </ol>
Comment:	<p>SOP`s all include PPE required for task Induction discusses PPE</p> <p>Golden Rules states – “Always wear appropriate clothing and use PPE and clothing as required”</p>
Observation:	
Non-conformance:	

# WHS Management System Review

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

Finding:	Non-conformance
Evidence:	1. HSWP6 - Health and Safety – Workplace Inspection 2. BOP - OSH risk management
Comment:	Plant is maintained however service books are not always kept. Workplace inspections does not refer to inspecting plant and equipment specifically
Observation:	Field audits on mobile plant and equipment identified not all equipment had service books in the machines or could find them.
Non-conformance:	Develop a record keeping procedure that details the requirements as per legislation on retaining records for the Shire.

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

Finding:	Conformance
Evidence:	1. HSWP24 working with moving and powered plant 2. BOP - Isolation and tagging
Comment:	Inductions do not include out of service process HSWP24- does not define inspections requirements (prestart) or what to do if a fault is found Isolation and tagging procedure cover unsafe plant and equipment
Observation:	
Non-conformance:	

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

Finding:	Conformance
Evidence:	1. HSWP24 working with moving and powered plant 2. BOP - Isolation and tagging
Comment:	HSPW24 has as the first bullet point of “controls for the safe operation of plant” SOPs for activities include safety of worker and others.
Observation:	Field inspections did not identify any non-compliance.
Non-conformance:	



# WHS Management System Review

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

Finding:	Conformance
Evidence:	1. HSWP24 – Work with moving and powered plant 2. Safety Training and Competence BOP 3. BOP - Tagging and Isolation
Comment:	Records of service/repairs completed. Safety training and Competence BOP roles is to ensure all personnel are competent in what they do.
Observation:	Field inspections conducted identified workshop staff have required qualifications to repair plant and equipment.
Non-conformance:	

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

Finding:	Non-conformance
Evidence:	
Comment:	Nil procedure available that relates to signage.
Observation:	Field inspections identified in several areas where signage is inadequate or incorrect.
Non-conformance:	Information regarding the standard of signage required for activities undertaken by the SSJ.

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

Finding:	Non-conformance
Evidence:	1. HSWP36 – Safe loading and unloading of bobcat excavator using low loader 2. Health and Safety – Hazardous Chemicals Storage guide 3. HSWP5 - Manual Handling
Comment:	Manual handling procedure gives overview of safety precautions
Observation:	
Non-conformance:	BOP - Hazardous substances does not include transportation of DG or chemicals

# WHS Management System Review

3.10.22 Workers are supervised according to their capabilities to ensure that tasks are performed safely and work instructions and procedures are followed.

Finding:	Conformance
Evidence:	1. HSWP4 – Health and Safety -Roles and Responsibilities 2. Health and Safety - Various. SOPs 3. HSWP6 – Workplace inspection
Comment:	HSWP4 has responsibilities for supervisors.  SOP state supervisor responsible for ensuring personnel are trained and competent and to ensure tasks completed safe – note the RA of the SOP does not allocate the task steps to anyone.  Workplace inspection procedure defines role supervisor has in conducting inspection.
Observation:	Field inspections did not identify any non-conformance.
Non-conformance:	

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

Finding:	Non-conformance
Evidence:	1. HSWP4 – Health and Safety -Roles and Responsibilities 2. HSWP6 – Workplace inspection
Comment:	HSWP4 Roles and Responsibilities defines roles for employees of how they should conduct their work activities with respect to HSE.  HSWP6 defines workplace inspection and includes “Offsite workplaces”.
Observation:	
Non-conformance:	Although HSWP6 Workplace Inspection does mention supervisors having the requirement to complete inspections when workers are “off-site” however there needs to be a more in-depth audit to determine the overall safety conditions that the worker will be working in and if it not acceptable the worker will not be placed.

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

Finding:	N/A
Evidence:	
Comment:	
Observation:	
Non-conformance:	

# WHS Management System Review

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and safety – Hazardous chemicals storage guide</li> <li>2. Revised health and safety – safety induction – Module 4</li> <li>3. HSPW6 Health and Safety – Workplace inspection</li> <li>4. Health and Safety – Site Safety Inspection</li> <li>5. BOP - Hazardous substances</li> </ol>
Comment:	<p>Health and Safety – Hazardous chemicals storage guide is not adequate. The induction has information that would satisfy basic training. Site safety inspection for hazardous chemicals not adequate.</p> <p>There is a training program that all workers must completed. It's completed through an RTO.</p>
Observation:	Field inspections did not identify any non-conformance.
Non-conformance:	

## 3.11 Emergency Preparedness and Response

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

- a) developed for the PCBU and its workplace
- b) in accordance with legislative requirements
- c) regularly reviewed.

Finding:	Non-conformance
Evidence:	E20/14535 Emergency Management Plan
Comment:	<p>EMP was last reviewed during August 2021.</p> <p>No Document Control procedure that identifies when documents should be reviewed.</p>
Observation:	
Non-conformance:	Develop a document control process that ensures documents are reviewed regularly, the correct templates are used for the specific document being developed and the correct person are reviewing and approving the document.

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSE Committee Meeting Minutes 21 July</li> <li>2. Emergency Preparedness and Response Procedure</li> <li>3. E20/14535 Emergency Management Plan</li> </ol>
Comment:	<p>Within the minutes, first aid training was booked for September Chief fire warden in charge during emergency.</p> <p>EMP defines the Emergency Control Organisation as having overall responsibility.</p>
Observation:	
Non-conformance:	

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety Requirements - contractor checklist</li> <li>2. Contractor Management Induction Manual</li> <li>3. Business Operating Policy - Contractor Health and Safety Management</li> </ol>
Comment:	<p>Part of Emergency Preparedness and Response Procedure identified the HSE Committee is to organise two drills per year.</p> <p>Section 7 of the Shire EMP identifies.</p> <p>Section 8 defines training for staff in the EMP.</p>
Observation:	Confirmation from People, Development and Wellbeing Manager that emergency drills are conducted with the most recent being the 16th of November 2021.
Non-conformance:	

# WHS Management System Review

3.11.4 Competent persons have periodically assessed the suitability, location and accessibility of emergency equipment.

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety – use of spill kit guide</li> <li>2. HSWP6 Workplace inspection</li> <li>3. Completed inspections</li> <li>4. Emergency Preparedness and Response Procedure</li> </ol>
Comment:	First aid kits, fire extinguishers etc. included on inspection checklists.
Observation:	<p>Field inspections identified areas at waste facility, Civils, Maintenance and Rangers where fire extinguishers and first aid kits were either not tested and tagged or were out of test date.</p> <p>Field inspections did not identify any area where it was lacking with regards to fire extinguisher or first aid kits.</p>
Non-conformance:	

3.11.5 Emergency and fire protection equipment, exit signs and alarm systems are inspected, tested and maintained. Suitability, location and accessibility are reviewed if there has been a change in the workplace.

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP6 Workplace Inspection</li> <li>2. Health and Safety RCA site inspection</li> </ol>
Comment:	Emergency equipment not listed for inspection or review
Observation:	Field inspections identified areas at waste facility, Civils, Maintenance and Rangers where fire extinguishers and first aid kits were either not tested and tagged or were out of test date.
Non-conformance:	Review of each departments emergency response equipment to ensure that it is available, contents fully stocked and is in date.

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3.11.8 The PCBU has procedures in place to assist workers who are exposed to critical incidents at work.

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Wellbeing survey</li> <li>2. BOP - Critical Incidents</li> <li>3. Health and Safety Meeting Minutes</li> <li>4. Injury Management and Workers Compensation</li> </ol>
Comment:	<p>Within the HSE Committee Minutes for 21 July, it states EAP training had been conducted for management teams. Same minutes have mental first aid training available for all.</p> <p>EAP in place for all employees.</p> <p>Critical incidents procedure point# 6 - states a stress support session for those involved with critical incidents.</p>
Observation:	
Non-conformance:	

## Element 4: Measurement and Evaluation

### 4.1 Monitoring and Measurement - General

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP6 Workplace Inspection</li> <li>2. Health and Safety Inspection checklist</li> </ol>
Comment:	
Observation:	No procedure in place, adhoc application of sending equipment for checks. No monitoring or testing being undertaken.
Non-conformance:	Establish a health and safety inspection, testing and monitoring program in the form of a schedule.

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

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>1. HSWP6 Workplace Inspection</li> <li>2. Health and Safety Inspection checklist</li> </ol>
Comment:	

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Observation:	During field audits workers from the department being reviewed were interviewed and asked questions relevant to their work and the HSE aspects involved.
Non-conformance:	

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

Finding:	Non-conformance
Evidence:	1. HSWP6 Workplace Inspection 2. Health and Safety inspection RCA
Comment:	Engineering controls not effectively covered in inspection.
Observation:	Field audits identified emergency stops are not listed on prestarts.
Non-conformance:	Vehicle and mobile plant prestart inspection forms are to be reviewed against plant and equipment. Any safety devices not listed on the form shall be highlighted and will trigger an update to the form.

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

Finding:	Non-conformance
Evidence:	1. HSWP6 Workplace Inspection 2. Health and Safety Inspection Checklist 3. Safety Metric Report
Comment:	Records of past inspections available
Observation:	Field audits included inspection of work environment; records of these audits are provided to the SSJ.
Non-conformance:	No procedure or process available that defines the process of keeping records. A procedure is to be developed that considers all types of records and how they must be kept.

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

Finding:	Non-conformance
Evidence:	1. HSWP6 Workplace Inspection 2. Health and Safety Inspection Checklist
Comment:	Is there a procedure regarding test equipment being calibrated identified etc. (Confined space testing, BAC, air monitoring).

Observation:	
Non-conformance:	Develop procedure that ensures health and safety equipment is inspected prior to use, calibration of the equipment is known and sent away when calibration is due and stored correctly. Included in the procedure is how records are to be maintained.

## 4.2 Monitoring and Measurement – Health Surveillance

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

Finding:	Conformance
Evidence:	1. HSWP7 Health Surveillance for Organophosphates Pesticides 2. BOP - Hazardous substances
Comment:	Chem alert is used for the shire, and it has a health risk assessment function There is a specific health surveillance for Organophosphate pesticide only
Observation:	
Non-conformance:	Review the hazardous substances and dangerous goods that are in use within the SSJ activities for any health surveillance requirements. Use this information in developing an overall Occupational Health Management Plan that will also cover noise, ergonomics, RSI, etc.

## 4.3 Incident Investigation and Corrective and Preventative Action

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

Finding:	Conformance
Evidence:	1. Occupational Health and Safety Investigation Toolkit March 2019 2. Health and Safety – Safety Training and Compliance - BOP
Comment:	Incident investigation toolkit provides information regarding corrective actions
Observation:	Corrective actions seen on a printout
Non-conformance:	



## 4.3.2 Investigations shall:

- be undertaken by a competent persons or persons in accordance with the PCBU's procedure
- identify the factor(s) that led to the injury, illness, incident or other system failure
- review the identified hazards, assessed risks and effectiveness of the control measures
- recommend appropriate control measures and corrective actions.

Finding:	Conformance
Evidence:	<ol style="list-style-type: none"> <li>Occupational Health and Safety Investigation Toolkit March 2019</li> <li>Health and Safety – Safety Training and Compliance – BOP</li> <li>HSE Advisor investigation training certificate</li> <li>Health and Safety Incident Investigation RCA Jarrahdale Rd 26 Feb 2019</li> </ol>
Comment:	<p>Training qualifications for investigator observed.</p> <p>Incident investigation observed – “RCA Jarrahdale 26 Feb 2019” contains all above criteria.</p>
Observation:	
Non-conformance:	

## 4.3.3 Corrective actions are:

- implemented in a timely manner
- undertaken in consultation with affected workers
- assessed for their effectiveness by assigned workers.

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>Occupational Health and Safety Investigation Toolkit March 2019</li> <li>HSE Committee meeting minutes 21 July 2021</li> </ol>
Comment:	Investigation procedure contains corrective actions but very light – only suggests to use hierarchy of controls when deciding on corrective actions, so use of SMART, involvement of others etc.
Observation:	No corrective action registers are available.
Non-conformance:	Develop a central corrective action register and have one person champion.

## 4.4 Records and Records Management

4.4.1 The PCBU has a program for the management of health and safety records, including their:

- a) identification and traceability
- b) collection, indexing, and filing
- c) access and confidentiality
- d) retention and maintenance
- e) protection against damage, deterioration or loss
- f) retrieval
- g) disposal.

Finding:	Non-conformance
Evidence:	
Comment:	No procedure available that defines the process for records and record management.
Observation:	
Non-conformance:	Develop a record keeping procedure that details the requirements as per legislation on retaining records for the Shire.

## 4.5 Health and Safety Management System Audit

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. Health and Safety – 3 steps to safety audit</li> <li>2. HSWP4 Roles and Responsibilities</li> <li>3. HSWP6 Workplace Inspection</li> </ol>
Comment:	
Observation:	Adhoc program.
Non-conformance:	Establish a health and safety audit program that will review the safety performance of workplaces against the applicable PCBU safety procedures.

## 4.5.2 The PCBU conducts scheduled audits to verify that:

- a) workplace activities comply with health and safety procedures
- b) procedures are properly implemented and maintained and
- c) procedures are effectively implemented across the PCBU.

Finding:	Non-conformance
Evidence:	1. Health and Safety – 3 steps to safety audit 2. HSWP 6 Workplace Inspection
Comment:	No audit program available.
Observation:	
Non-conformance:	Establish a health and safety audit program that will review the safety performance of workplaces against the applicable PCBU safety procedures.

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

Finding:	Non-conformance
Evidence:	1. BOP Safety Performance Appraisal 2. 3 Steps to Safety Audit 2019 3. HSWP6 Workplace Inspection 4. HSE Committee Meeting 21 July
Comment:	No Corrective Action register available.
Observation:	
Non-conformance:	Develop a procedure (Performance monitoring) that includes criteria on managing corrective actions. Included in this procedure is a standard corrective action register that is to be used for all departments and have the responsibility of managing the review and closure to the HSE department.

## Element 5: Management Review

### 5.1 Management Review

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

- a) health and safety management system audit results
- b) objectives, targets and performance indicators
- c) changing circumstances
- d) opportunities for continuous improvements.

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. BOP Safety Performance Appraisal</li> <li>2. 3 Steps to Safety Audit 2019</li> <li>3. HSWP6 Workplace Inspection</li> <li>4. HSE Committee Meeting 21 July</li> </ol>
Comment:	<p>There is a section within the HSE Committee Meeting Minutes "section 3 Positive Performance Indicators" where this information would likely be discussed. The minutes of July 2021 had a toolbox and quiz in this section.</p> <p>Audits are adhoc with no program in place.</p>
Observation:	
Non-conformance:	Develop a procedure (Performance monitoring) that includes criteria reviewing the Safety Management Systems effectiveness and suitability for the SSJ.

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

Finding:	Non-conformance
Evidence:	<ol style="list-style-type: none"> <li>1. BOP Safety Performance Appraisal</li> <li>2. 3 Steps to Safety Audit 2019</li> <li>3. HSWP6 Workplace Inspection</li> <li>4. HSE Committee Meeting 21 July</li> </ol>
Comment:	No Corrective Action Register.
Observation:	
Non-conformance:	Develop a procedure (Performance monitoring) that includes criteria on managing corrective actions. Included in this procedure is a standard corrective action register that is to be used for all departments and have the responsibility of managing the review and closure to the HSE department.

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

Finding:	Non-conformance
Evidence:	5. BOP Safety Performance Appraisal 6. 3 Steps to Safety Audit 2019 7. HSWP6 Workplace Inspection 8. HSE Committee Meeting 21 July
Comment:	No Corrective Action Register.
Observation:	
Non-conformance:	Develop a procedure (Performance monitoring) that includes criteria on managing corrective actions. Included in this procedure is a standard corrective action register that is to be used for all departments and have the responsibility of managing the review and closure to the HSE department.