Health and Safety Manual

Version 3.0

CSE Australia

*a **CSE** global company*

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When updated, the following people must receive a copy of the updated version:

Position / Title	Position / Title
CEO	CSE Business Unit Managers
Group Commercial Manager	

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1. Introduction

Headquartered in West Perth, Western Australia, CSE-Global (Australia) Pty Ltd (hereinafter **CSE**) believes that effective health and safety management systems and processes are paramount to ensuring the health, safety and wellbeing of employees, and other stakeholders.

CSE Australia (website: www.cse-australia.com) is the parent company for the following:

- **CSE Crosscom**
- **CSE Uniserve**
- **CSE New Zealand**
- **RSC Telecommunications**

Each of the above listed companies is committed to ensuring that CSE policies and procedures are adhered to.

CSE maintains a Health and Safety Management System aligned to the ISO 45001 standard.

1.1. Purpose, Scope, Objectives

The primary purpose and objectives of this Health & Safety Program are:

- To provide a safe and healthy workplace for our personnel, subcontractors, customer representatives, and the community in achieving zero injuries.

- To identify hazards, assess and control associated risks to as low as reasonably practicable through the implementation and review of health and safety procedures.

- To comply with all applicable health and safety regulations, industry standards and codes of practice.

- To provide, instruction, training and supervision necessary to ensure the health and safety of all employees.

- To make arrangements for ensuring the safe use, handling, storage and transport of equipment and substances.

- To involve personnel in the development of health and safety strategies to promote and maximise their commitment to these objectives.

- To provide leadership through well-trained and competent personnel on all works.

- To clearly define areas of health and safety responsibility.

- To thoroughly investigate all incidents, including near miss events to prevent occurrence.

- Empower personnel with the ability to cease an activity if they consider it unsafe.

These objectives apply to the employees and operations of all CSE Australia group of companies.

2. Reference Documents

Regulations, standards, other documents applicable to this document are provided below.

Title
Acts, Regulations, Standards and Codes of Practice
See CSE Australia *Work Health and Safety Regulatory Register*
Internal Documents
Policies and Manuals
CSE Australia Integrated HSEQ Management System Manual
CSE Australia Health & Safety Policy
Document Control & Records Management
HSEQ System Monitoring and Improvement Manual
Plant, Equipment and Instrumentation – Maintenance and Calibration
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Hazardous Substances Risk Assessment
Forklift Inspection Checklist (LPG Forklift)
Emergency Evacuation Debrief
Personal Emergency Evacuation Plan
Forklift Inspection Checklist (Electric Forklift)
General Office Inspection Form
Permit to Work – Working at Heights
Risk Assessment and Control Guide
Permit to Work – Hot Works
Portable Ladder Inspection Checklist
Incident Investigation and Close-out
Fatigue Management Form
Monthly HSE Report

3. Terms, Definitions and Abbreviations

Abbreviation/Term	Definition
ALARP	As Low As Reasonably Practicable (when controlling risk).
CEO	Chief Executive Officer
Company	CSE Australia Pty Ltd and its subsidiaries.
Continual Improvement	A recurring activity to increase the ability to fulfill requirements.
Corrective Action	Action taken to eliminate the cause of a detected nonconformity or other undesirable situation.
IMS	Integrated HSEQ Management System
Inspection	Checking and testing for condition, performance, and safety of equipment against established standards or conformance with Contract requirements.
JSEA	Job Safety Environment Analysis

Abbreviation/Term	Definition
SDS	Safety Data Sheet
Nonconformity	Non-fulfilment of a requirement. A nonconformity can be any deviation from: • Relevant work standards, practices, procedures, legal requirements, etc. • WHS management system requirements
OH&S	Occupational Health & Safety See 'WHS' – Workplace Health and Safety.
OFI	Opportunity for Improvement
PPE	Personal Protective Equipment
PTW	Permit to Work
RAW	Risk Assessment Workshop **NOTE –** Sometimes also referred to as CRAW (Construction Risk Assessment Workshop)
RCA	Root Cause Analysis
Responsible Person	A responsible person is someone who has a legal duty of care and responsibility towards the health, safety and wellbeing of persons in the workplace. A responsible person may include the following persons: • A *person conducting a business or undertaking* (or PCBU), as defined the Australian Model Work Health and Safety Act and Regulations, • A person who is not a PCBU, but holds a position in the business in which he/she shares the responsibility for the control and supervision of persons conducting work, ensuring their health, safety and wellbeing.
Risk	The combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or ill health that can be caused by the event or exposure(s). • **Low Risk –** Risk is generally acceptable. Hazard is managed by routine procedures. • **Moderate Risk –** Risk is generally acceptable, but will require regular monitoring with respect to consideration of the effectiveness of controls, and changing operating/working conditions. • **High Risk –** Risk is unacceptable. Activity is not to be carried out until such time as a full hazard identification and risk assessment is conducted, and a risk mitigation plan is developed in consultation with affected workers and workplace management. • **Extreme Risk –** Risk is unacceptable. Activity is not to be carried out until such time as a full hazard identification and risk assessment is conducted, and a risk mitigation plan is developed in consultation with affected workers, workplace management and senior management.

Abbreviation/Term	Definition
Short Service Employee (SSE)	CSE defines a Short Service Employee as: • Any employee with less than three months experience with CSE in their current role • Employees who are yet to complete two (2) complete field trips or job rotations to the satisfaction of their supervisor/mentor
WHS	Workplace Health and Safety. **NOTE –** The CSE Integrated HSEQ Management System (IMS) uses the abbreviation 'WHS' in place of the abbreviation 'OH&S' (Occupational health and safety)
WHS Management System	Part of an organisation's management system used to develop and implement its WHS policy and manage its WHS risks. **NOTE 1 –** A management system is a set of interrelated elements used to establish policy and objectives and to achieve those objectives. **NOTE 2 –** A management system includes organisational structure, planning activities (including, for example, risk assessment and the setting of objectives), responsibilities, practices, procedures, processes and resources. **NOTE 3 –** The CSE Integrated HSEQ Management System (IMS) uses the term 'WHS Management System' in place of the term 'OH&S Management System'

4. Responsibilities and Authorities

4.1. Chief Executive Officer

The CSE Australia CEO has the below responsibilities and authorities:

- Ensure that systems are in place that communicate the WHS management systems and plans, as well as management commitment towards the WHS policies to staff, their representatives, customers and suppliers

- Ensure that the roles, responsibilities and accountabilities required for effective health and safety management are clearly defined, documented and communicated, including any authorities required to achieve this goal

- Ensure adequate human, technical and financial resources are allocated for WHS matters

- Ensure that WHS goals and performance is included as an agenda item in executive management and board meetings

- A staff appraisal system that includes HSE is established

- Ensure that mechanisms are provided and supported to ensure effective consultation with employees, their representatives, clients and suppliers

- Attend selective meetings, training sessions and other WHS related events to publicly demonstrate support

- Ensure all personnel employed by CSE Australia are appropriately trained, competent, responsible and accountable for their duties and responsibilities in regard to Health and Safety

- Work in conjunction with the appropriate Managers and Supervisors to determine the investigative procedures to be followed to assess the cause of incidents and to identify corrective actions to prevent recurrences

- Supervise the injury management and rehabilitation of injured employees. The CEO, or suitable delegate, shall be responsible for approving the position descriptions and duty statements for injured employees

- Establish active consideration of safety and environmental issues as a prerequisite to all CSE Australia operations and activities at all times

4.2. HSE Manager

The HSE Manager is ultimately responsible for the establishment, implementation and maintenance of the CSE Australia *HSE Management System* in accordance with legislative requirements, and standards and codes to which we subscribe.

To meet this objective, the HSE Manager shall:

- Ensure that all Company activities include appropriate WHS provisions and planning

- Be responsible for acquiring information on WHS matters and communicating it to all staff through the designated communication channels

- Work in conjunction with business managers and supervisors to determine investigative procedures to be followed to assess the cause of incidents and to identify corrective actions to prevent recurrences

- Investigate WHS incidents and prepare reports on incidents for consideration Management

- Identify and develop WHS initiatives

- Provide guidance and support to managers, supervisors and all employees on WHS matters

- Ensure that contracted customer works are carried out with a view to identifying hazards, and managing risk to the lowest practicable level

- Ensure that all staff participate in the necessary training to enable them to undertake their work safely and to comply with WHS legislation, regulations, standards and codes

- Be responsible for ensuring that workplace safety committees are operational and complying with all relevant legislation and regulations

- Shall maintain an incident/concern/risk register and to ensure that all incidents/concerns are investigated and recorded in accordance with legislative provisions

- Audit and identify activities with potential Health, Safety and Environmental impacts and advising Management of any potential risks and where necessary, and address as necessary

- Provide WHS reports to business managers

The HSE Manager has the authority to:

- Communicate with any external interested parties, and prepare any external written correspondence

- Direct and approve the allocation of financial resources, within defined authority limits, to achieve desired WHS objectives and goals

- Assess and approve the use of suppliers and subcontractors in the pursuit of WHS objectives

4.3.   General Managers and Managing Directors

CSE Australia General Managers and Managing Directors shall:

- Ensure that all WHS provisions are met for all works, and that all subcontractors engaged to work on CSE Australia contracts comply with CSE Australia provisions for WHS.

- Ensure that all required inspections and checks have been undertaken to ensure that work areas, work methods, materials, plant and equipment complies with safety legislation, regulations, standards and codes

- Ensure that effective hazard identification and control measures are being used by employees and contractors through review and audit

- Ensure that all employees and contractors are aware of emergency procedures and how these will be implemented and liaise with external parties on safety and emergency response matters

- Work with the designers of all works to ensure that due consideration is given to WHS issues in the design process. Where further design work is carried out, or changes in a project force a review and alteration of the original designs, the relevant manager and Site Supervisor will be consulted with regard to the WHS issues relating to the proposed changes

- Carry out prompt investigation of all incidents, which result in or could have resulted in either injury to persons or damage to property so that remedial action may be affected promptly

- Ensure that all relevant permits are in place prior to work commencing

- Confirm that all employees are acquainted and comply with records and reports required for onsite standards and processes set by the customer

- Ensure that all employees under their control receive adequate instruction for the safe and efficient performance of their duties and encourage all site personnel to identify and report possible hazards

General Managers and Managing Directors have the authority to:

- Identify and allocate resources which address identified WHS hazards with a view to controlling risk
- Report to the HSE Manager any workplace hazards and incidents which come to their attention
- Assess and approve the use of suppliers and subcontractors in the pursuit of WHS objectives

4.4.   Operational Managers and Supervisors

Operational Managers and Supervisors shall:

- Be fully familiar with CSE and customer WHS procedures

- Be responsible for ensuring that workplace environments are kept safe and that employees and contractors follow safe work methods

- Establish and maintain a positive safety culture

- Ensure effective hazard identification and control measures are being used by employees and sub-contractors through review and audit

- Regularly attend and host Safety Meetings

- Monitor and register all relevant permits prior to work commencing

- Guide and direct WHS meetings

- Monitor day to day work activities, conditions and ensure SWMS/JSEAs are being used

- Make corrections to unsafe or unhealthy acts or conditions in areas under their control to the full extent of their authority. When a necessary correction is outside their authority, they shall refer the matter to the relevant manager

- Provide site implementation and support of the WHS procedures and compliance to all customer requirements

- Ensure that a high standard of housekeeping is maintained at all times

- Ensure where necessary, the issue of and correct use of personal protective equipment

Operational Managers and Supervisors have the authority to:

- Identify and recommend resources which address identified WHS hazards with a view to controlling risk

- Report to Business Managers and/or the HSE Manager any workplace hazards and incidents which come to their attention

- Assess and approve the use of suppliers and subcontractors in the pursuit of WHS objectives

4.5.   Employees and Contracted Personnel

All employees and subcontracted personnel shall:

- Take responsibility for following safe work procedures

- Perform their work in accordance with WHS standards applied by CSE, relevant regulations or relevant codes of practice

- Attend workplace safety meetings for the purpose of receiving relevant workplace safety information, and to share experiences to make the workplace safer

- Comply with records and reports required for onsite standards and processes set by the company and customers

- Ensure that high standard of housekeeping is maintained at all times

- Report to their designated supervisor and/or Site Supervisor any unsafe or unhealthy acts or conditions in working areas

- Demonstrate an appropriate Duty of Care to protect the health and safety of themselves and others

All employees have the authority to:

- Feel empowered to raise and discuss any WHS hazards or concerns they feel important

- Raise any ideas or initiatives they may have with regard to how the workplace can improve its WHS performance

- Provide input for HSE Committee meetings that they feel relevant

- Identify how the Company can meet customer and other stakeholder expectations in regard to WHS performance

5. Setting WHS Objectives and Targets

As the basis for maintaining an effective WHS management system, CSE Australia plans for, and sets, WHS objectives aimed at fulfilling the commitment made in the *Health and Safety Policy*. This is primarily focussed on our commitment to the prevention of injury and ill health.

By setting and reviewing objectives, and implementing processes to achieve these, ensures CSE Australia continually improves our WHS Management System, and improve our WHS performance.

The process for setting objectives and targets are set out in the *HSEQ System Monitoring and Improvement Manual*.

6. Meeting Legal and Other Requirements

CSE Australia is committed to complying with all relevant legal requirements, and other standards to which we subscribe, in support of the effective implementation of the WHS management system.

Health and safety legislation, standards, codes of practice and other applicable requirements relevant to our WHS management system are identified on an ongoing basis, as regulations and standards change, or the scope of business operations change.

The identification of applicable legal requirements, and other compliance sources, occurs through a combination of the below:

- Hazard identification and risk management activities, including the development of operating procedures
- Reference to high-level WHS guidelines, such as the *Australian Master Work Health and Safety Guide* (released by CCH Australia)
- Reviews of customer requirements, which may take place during project bids, commencement of works, or subsequent to audits and inspections
- Planned review of internal regulatory registers against online regulatory compliance sources, for example:
    - Safe Work Australia – http://www.safeworkaustralia.gov.au/
    - SAI Global online subscription – http://www.saiglobal.com/
    - Australasian Legal Information Institute (Austlii) - http://www.austlii.edu.au/
- Reviews of requirements of industry regulators and associations, for example:
    - Australian Petroleum Production & Exploration Association (APPEA),
    - National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA)
    - Office of the National Rail Safety Regulator (ONRSR)
    - Government of Western Australia – Department of Mines and Petroleum (Safety, Environment)

- 'Push' notification of regulatory updates via various online sources, for example:
    - Safe Work Australia – http://www.safeworkaustralia.gov.au/
    - SAI Global email notifications – http://www.saiglobal.com/
    - Professional social networking media – e.g. LinkedIn Discussion Groups (http://www.linkedin.com/)
- Response to incident reports or non-conformances (internally and externally generated), based upon identified causal factors, and any required corrective and/or preventive actions that stem from investigations

Identified regulatory compliance sources are summarised within the CSE *Work Health and Safety Regulatory Register* (CSEGA-HSE-QR-0-185).

Where identified, new or previously unlisted compliance sources will be added to this register.

Further, CSE ensures that any statutory requirements are considered prior to proceeding with fulfilling contractual obligations.

Relevant regulatory compliance controls are established within standard operating procedures, which form the basis for induction training for all employees (as relevant to their roles).

6.1.   Communicating Legal and Other Requirements

Relevant stakeholders will receive information of applicable legal (and other) requirements to which CSE complies.

Where explicit legal requirements are to be communicated within the business, primary methods for internal communication will include:

- Formal notification by the HSE Manager
- SharePoint (Intranet) Announcements
- Workplace Noticeboards
- Toolbox Talks, and other workplace meetings
- Email
- Other informal or special-purpose committees and meetings

Identified compliance sources form the basis for internal audits and other activities that permit CSE to evaluate compliance with such sources (see *Evaluation of Compliance* within this document).

6.1.1. Changes to Legal and Other Requirements

The same mechanisms used to identify legal and other requirements are also used to alert CSE to changes to any applicable requirements.

When there is a change to legal requirements, this is recorded in the *WHS Evaluation of Compliance Register*, with a summary of how the change effects CSE. Relevant personnel are then made aware of this change, using the method outlined in 6.1 *Communicating Legal and Other Requirements.*

7. Control of Documents and Records

In order to ensure that WHS Management System is effective, CSE Australia identifies and develops documents (including records) that are required for the effective planning, operation and control of processes that relate to the management of significant work, health and safety risks.

All CSE Australia WHS documents are maintained in accordance with the *Document Control and Records Management Manual* (CSEGA-QA-QM-0-068).

Procedures, forms, work instructions, and other pertinent documents of an external origin are issued within the Company on a controlled basis by way of master registers and/or electronic means. Where appropriate, documents are reviewed and approved prior to issue, and all updates are managed in a controlled manner.

7.1. Contract-specific Document Control

Where required, contract-specific templates and documentation are developed and maintained at a level that provides for and supports the delivery of project WHS deliverables, and the ongoing support of the system once in operational mode.

7.2. Records Management

Records generated by the business will be stored in either hard or electronic copy in such a way that they are easily available and legible.

The HSE Manager ensures that records are kept that clearly show incident statistics which include information on time lost from the workplace, frequency and duration rates of incidents. Records kept will be in keeping with *AS1885.1 Workplace Injury and Disease Recording Standard*.

Records are stored for a minimum of five years unless there is a statutory or contractual requirement for a longer period of storage (e.g. health monitoring records)

WHS records include the following:

- Inspection Reports
- Reports of incidents (incl. near miss events)
- Minutes of WHS and Consultative meetings
- Internal Review Reports
- Induction and training records
- Design reviews
- Dangerous goods / hazardous substance registers (incl. MSDS)
- Safety equipment records

- Audit reports
- Incident Analyses
- Incident Statistics
- Corrective action reports
- Qualifications held by individuals
- Employee injury management records
- Competencies, licenses and certificates held by Company personnel
- Lists of preferred suppliers

Provision is made for holding certain personal/confidential records. These include records relating to pre-employment medicals, worker's compensation documents and details relating to rehabilitation. Storage and retrieval of these documents is the responsibility of the HSE Manager.

With respect to site operations, the Business Manager, with the assistance of the Site Supervisor, establishes at the site office a system for the collection, indexing, filing and storage of WHS records for on-site works.

8. Risk Management

Health and Safety Risk Management is the proactive identification, assessment and control of potential risks, to minimise the impact on health and safety within CSE.

Risk management activities will be conducted in a manner that is appropriate to the scope of CSE activities, the nature of operations, and those activities identified as high priority.

CSE follows a 4-step continuous risk management process as per the following sections.

For detailed guidance on the risk management process refer to the CSE *HSE Hazard Identification and Risk Management Procedure* (CSEGA-HSE-QP-0-183).

8.1. Hazard Identification

A hazard is anything that can cause injury to a person or harm the health of a person.

CSE Australia ensures that all hazards are identified, assessed and controlled within relevant workplace documents, e.g. Safe Working Procedures, Safe Work Instructions and Safe Work Method Statements.

Hazards are identified in a number of ways including:

- Review of incidents experienced in the past or on similar work
- Workplace and Site inspections
- Internal and External Audits
- Hazards identified by employees, the Customer or site operator
- Pre-mobilisation risk assessment workshop (CRAW)
- Preparation of Safe Work Method Statements (SWMS) and completion of Take 5's
- Observation of work activity
- Daily pre-start meetings
- Toolbox meetings

8.2. Risk Assessment

A risk assessment involves considering what could happen if someone is exposed to a hazard and the likelihood of it happening. This helps to determine:

- How severe a risk is
- Whether existing control measure are effective
- What action is needed to control this the risk
- How urgently the action needs to be taken

The CSE *HSE Risk Assessment Matrix (CSEGA-HSE-QF-0-046) is* used to guide the risk assessment process.

8.3. Risk Control

The most important step in managing risks involves eliminating them, or if that is not possible, minimising the risks so far as is reasonably practicable.

CSE uses the Hierarchy of Controls to assist in identifying the most effective control measures to reduce the risks posed by hazards. This requires that control strategies at the 'top' of the hierarchy be considered before items 'lower' in the hierarchy.

Hierarchy of Control	
Elimination	Eliminate the hazard out of the workplace
Substitution	Substitute less hazardous means instead of the identified hazardous means (i.e. use water-based chemicals rather than solvent based ones
Isolation	Put in place barriers to shield or isolate the hazard e.g. guards on machines, enclosures for noisy machinery
Engineering Controls	Put into place a system to counteract the hazard e.g. install an exhaust ventilation system to extract dangerous fumes or dust
Administrative Controls	Put into place work routines that reduce the time people are around the hazard.
Personal Protective Equipment	Give people protective equipment and clothing that they have to wear while near the hazard e.g. ear plugs or face masks

Administrative controls and PPE should only be used:

- When there are no other practical control measures available

- As an interim measure, until a more effective way of controlling the risk can be used

- To supplement higher level measures

8.4. Review Control Measures

Control measures are reviewed regularly to ensure they are working as planned. Reviews of controls take place at a time where the controls have had an opportunity to take effect in reducing risk. The review of controls involves consultation with workers, and considers the below:

- Are the control measures working effectively in both their design and operation?

- Have the control measures introduced unforeseen problems / issues?

- Are the controls being followed?

- Are the controls understood?

- If new legislation or new information becomes available, does it indicate current controls may no longer be the most effective?

There are certain situations where WHS Regulations require a review of control measures:

- Where the control measure has been found to be ineffective in controlling the risk

- Where corrective and/or preventive action identifies new or changed hazards, or the need for new or changed controls

- If a new hazard or risk is identified

- If the result of consultation with workers indicates that a review is necessary

- A change at the workplace occurs which is likely to give rise to a new or different WHS risk

Where these situations occur, the risk management process shall be repeated, information reviewed, and further decisions can be made about risk control. Priority for review should be based on the seriousness of the risk. Control measures for serious risks will be reviewed more frequently.

8.5.   WHS Risk Registers

The HSE Manager maintains a *Corporate WHS Risk Register* which lists all identified hazards in each CSE workplace, and hazards associated with typical work activities carried out by CSE personnel. This risk register is reviewed during internal audits to ensure:

- It remains relevant,

- Unidentified hazards are identified

- Personnel are aware of the identified control measures.

For Projects a WHS Project Risk Register is developed during works and is maintained by the relevant Project Manager and HSE Manager. As the principal risk record, all personnel on the Project are expected to comply with the control methods outlined in the risk register.

WHS Risk Registers are reviewed if significant incidents occur and when a change is made to the scope of work.

Communication of WHS Risk Registers to all personnel is through:

- Induction

- Bulletins

- Risk Assessment Workshops (RAW)

- Safety meetings such as pre-start and Toolbox Talks

- JSA/SWMS development

8.5.1. WHS Risk Assessment Workshops

WHS Risk Assessment Workshop/s (RAW) are held prior to works that entail significant mobilisation or high-risk activities. The Project Manager or HSE Manager will ensure risk workshops are undertaken with regard to:

- Mobilisation & De-mobilisation

- Communications & Consultation

- Subcontractor Management

- Elevated work / Work at Heights

- Monitoring, Inspection and Audit

- Traffic Management

- Emergency, Crisis and Incident Management

- Mobile Plant & Equipment

8.6.   High Risk Situations

Work processes or situations which involved a heightened level of risk will be identified by the HSE Manager and Supervisor.

Where these are identified, Permits to Work and Safe Work Method Statements for these risks are developed. These are issued to relevant staff and the Supervisor monitors conformance with them.

8.7.   Safe Work Procedures

The need for and development of Safe Work Procedures (SWP) is determined at initial planning activities, and on a progressive basis. Safe Work Procedures include combinations of:

- Written procedures and Stipulated Operating Criteria
- Permits to Work
- Safe Work Method Statements (SWMS) / Job Safety Environment Analyses (JSEA)
- Training Documents

8.7.1.   Permits to Work

Permit to Work (PTW) systems are established and implemented to provide additional control for critical high-risk activities. CSE Australia implements formal permits for the following work scopes relevant to the Project activities:

- Confined space entry
- Working and heights, including work performed under fall arrest systems

All permits will be completed using relevant forms and will be approved by relevant permit authorities before any work commences.

8.7.2.   Safe Work Method Statements (SWMS)

SWMS (sometimes referred to as JSEA) is the process used to identify, and record hazards associated with a task or activity.

The SWMS preparation process is as follows:

- Break the job into logical steps
- Identify the hazards in each step
- Risk assess the hazards
- Develop controls and/or measures to eliminate or reduce the risk associated with the identified hazards to a level that is acceptable

Employees involved with carrying out the task/activity are to participate in the SWMS development.

8.7.3.   Take 5

CSE has an electronic Take 5 which is available through the Company Intranet at this link. This is a short checklist which helps employees to identify health and safety hazards and ensure all controls are in place before they start work.

The requirement to complete a Take 5 depends on the task being undertaken and customer requirements.

CSE highly encourages that a Take 5 is completed before every site-based job, and non-routine tasks. A Take 5 in itself is often not a sufficient risk management tool, and is used in conjunction with other tools (e.g. SWMS, permits to work and SOPs).

9. Management of Change

A range of situations may arise which may require the close management and control of changes that can affect or impact on health and safety hazards and risks. This may include corrective and/or preventive actions, changes to organisational structure, personnel, processes, activities, materials or products in use within the workplace.

Where these changes appear, they must be evaluated through the hazard identification and risk assessment process.

The following are examples of conditions that may require a management of change process:

* New or modified technology (including software), equipment, facilities, or work environment

* New or revised procedures, work practices, designs, specifications or standards

* Significant changes to organisational structure and staffing, including the use of contractors

* Modifications of health and safety devices, equipment or controls

The management of change process will include consideration of the following questions to ensure that any new or changed risks are acceptable, or that they have been suitably managed:

* Have new hazards been created?

* What are the risks associated with the new hazards?

* Have the risks from other hazards changed?

* Could the changes adversely affect existing risk controls?

* Have the most appropriate controls been chosen, bearing in mind usability, acceptability and both the immediate and long-term costs?

10. Fitness for Work

CSE Australia recognises that ensuring healthy lifestyles is one important way to improve the health, happiness and productivity of personnel and reduce the levels of workplace injuries and levels of sick leave.

CSE has implemented health and wellbeing initiatives to make positive impacts on personnel health. Fitness for Work requirements are to be communicated through site inductions, WHS communications and awareness sessions.

All employees have a duty of care to ensure they are fit to conduct their work safely.

All Position Descriptions have an associated *Job Impact Statement* (JIS) which details the components of the role that may impact on an employee's health and wellbeing.

Fitness for work principles will cover the following aspects of work:

- **Pre-deployment / pre-employment physicals:** Typical work activities that warrant pre-employment or pre-deployment medical tests will be identified, ensuring that employees are physically capable of performing their job functions.
- **Training and Competence:** Employees will receive training specific to their assigned task(s). This will include awareness of the risks of potential safety hazards, and how to avoid these –
- **Safe Work Procedures:** Employees will be required to follow safe work procedures, including working at heights, working with electricity, LO/TO, plant and equipment safety.
- **Fatigue management:** CSE will provide adequate opportunity for recovery sleep between shifts to ensure an employee's performance is not impaired by fatigue. Employees have a duty to ensure that they are physically and mentally fit to perform their job functions safely, both for their own health, safety and well-being, and also for other persons in the work environment. Employees are encouraged to self-report if they feel fatigued to the point of not being able to perform their duties safely.
- **Drug and Alcohol management:** in accordance with the CSE Drug and Alcohol Policy
- **Mental Health:** All employees have access to a confidential counselling service through our Employee Assistance Program.

Records pertaining to fitness for work assessments are considered as confidential and will be retained by the company in accordance with regulatory requirements.

For further information on the CSE Fitness for Work documents refer to the CSE *Fitness for Work Procedure* (CSEGA-HSE-QP-0-085).

11.   Short Service Employees

CSE acknowledges that near misses, incidents and injuries are more likely to occur among less experienced staff members. As such where necessary CSE implements a *Short Service Employee* (**SSE**) program to provide guidance, mentoring and supervision of newly hired or inexperienced employees to ensure they have the necessary skills to carry out their jobs.

Definition

CSE defines a Short Service Employee as:

- An employee with less than six months experience with CSE in their current role, who is required to complete customer/site-based works

- Employees who are yet to complete two (2) complete field trips or job rotations to the satisfaction of their supervisor/mentor

When working on site, all Short Service Employees will be assigned on onsite mentor. This mentor is a supervisor or other experienced employee who has been assigned to help and work with a Short Service Employee by their Manager.

A mentor is expected to:

- Be familiar with the Short Service Employees job, the oversight responsibilities required, and the hazards associated with that job

- Be familiar with site policies, procedures and any specialised actions required in the work to be performed

- Be able to recognise hazards and unsafe acts

- Only have one Short Service Employee under their guidance at any given time

- Always accompany the Short Service Employee on site to provide adequate guidance and instruction

It is important for supervisors, co-workers and project managers to be able to recognise a Short Service Employee. Short Service Employees will be identified by their mentor to other relevant workers, which will entail defining such things as:

- Activities that can be undertaken independently

- Activities that must be performed under direct supervision

- Activities that cannot be performed

- Any additional criteria that must be met when performing work – e.g. Pre-start permits, restrictions around places that the SSE may work in without supervision.

11.1.   End of SSE Period

An employee will no longer be considered a SSE when they have met all of the following criteria:

- A minimum of six (6) months continuous service in their job role OR,

- Deemed competent by their manager in consultation with their mentor on the basis of skills and experience

- A minimum of two (2) complete field trips/job rotations to the satisfaction of their supervisor/mentor

12.   Subcontractor Management

CSE understands the importance of selecting subcontractors who are capable and competent to perform works to a high standard, in a safe manner. Under Australia and New Zealand legislation, subcontractors fall under the definition of 'worker', and as such fall under CSEs duty of care in the workplace.

Where Subcontractors are engaged by CSE, their scope of engagement is broken into three categories, and they are defined as:

Level	Definition
1.	A person or organisation that has been engaged by CSE to deliver a specific scope of work on our behalf for a customer. The work may be at the customer's site or our own premises.
2.	A person or organisation that has been engaged by CSE to deliver a specific scope of work on our behalf that is low risk and office based. The work may be at the Subcontractors own premises.
3.	A person or organisation contracted by CSE to perform maintenance or facility management at our facilities, and includes, but is not limited to: • Aircon Technician • Fire Equipment Testing • Electrical / Equipment servicing / installation • Mechanical servicing / installation Exception to these Subcontractors are:

• Soft Service Providers such as Cleaners, Security Bin Collection, etc. (Note: For clarification please contact the HSE Manager)

12.1. Selection of Subcontractors

CSE Australia subcontractors are selected and appointed on the basis of their ability to satisfy project requirements, including their ability to work in a manner that protects the health and safety of all stakeholders involved in works.

All subcontractors engaged by CSE Australia must undergo the selection and qualification process outlined in the *Subcontractor Pre-Qualification Procedure* (CSEGA-COM-QP-0-094).

The purpose of the selection, evaluation and approval process is to assess the capabilities of potential subcontractors, ensuring that any accepted subcontractors have the capability to meet the requirements stated within this document.

The following WHS related risk factors are considered during the procurement process:

- Type of work performed (e.g. construction work, use of plant, working at heights, exposure to known high-risk safety hazards)

- Size of company and number of employees expected on-site

- Workforce issues (e.g. general level of competence, language, numeracy and literacy)

- Level of supervision expected

- Use of high-risk plant and equipment and criticality of safety advice

Subcontractor safety metrics are reviewed and assessed by CSE as part of the selection process. This includes:

- Injury rates – i.e. lost time injuries (LTIs), medically treated injuries (MTIs), total recordable incidents and injuries.

- Safe Work Procedures – This may include a review of high-risk Safe Work Method Statements, Job Hazard Analyses and other safe working procedures.

- Record of safety infringements received within the past 5 years, and confirmation that these have been addressed.

- Staff competency and licencing

Where work is being carried out for a Customer, the relevant Manager shall obtain from the Customer any required approvals to engage a subcontractor

12.2. Onboarding of Subcontractors

Once a subcontractor has been approved to be engaged, the Manager responsible for the subcontractor must ensure they are adequately onboarded in accordance with the *Subcontractor Safety Management Procedure* (CSEGA-HSE-QP-0-098).

Depending on the works performed, and amount of time the subcontractor will either undergo:

- The CSE *Subcontractor Induction* (CSEGA-COM-TP-0-109); or

- A site-specific induction

In addition to CSE requirements, the subcontractor will also be expected to undertake all customer required inductions (where applicable).

12.3.   Management and Support of Subcontractors

Upon the award of works to a subcontractor the relevant Manager, or HSE Manager will assist with the subcontractor start-up activities in accordance with the *Subcontractor Safety Management Procedure* (CSEGA-HSE-QP-0-098).

Different levels of subcontractors will be managed in different ways, as the level of risk changes based on the level.

12.4.   General Responsibilities of the Subcontractor

The Subcontractor will, as a minimum requirement, maintain and demonstrate compliance with:

- All the duties of an employer as specified in the relevant Work Health and Safety Legislation and associated regulations

- Comply with all work health and safety procedures and processes of CSE Australia.

- Comply with any and all directions of the relevant Manager

13.   Training Management

In accordance with the CSE *Training Management Program* (CSEGA-HR-QP-0-196) CSE ensures that all employees receive appropriate and timely WHS training reflecting the needs and demands of the work they will undertake. This will include training and awareness of:

- The work, health and safety consequences (actual or potential) of their work activities, their behaviour, and the work, health and safety benefits of improved personal performance.
- Their roles and responsibilities, and importance in achieving conformity with the CSE work health and safety policy and procedures, and with the requirements of the work health and safety management system, including emergency preparedness and response requirements.
- The potential consequences of departure from specified procedures.

The relevant manager is responsible for developing and implementing induction requirements for all employees, subcontractors and visitors.

13.1.   Identifying Training Needs

CSE will proactively identify relevant WHS training needs associated with works and the corporate WHS management system.

When an adverse potential health and/or safety consequence is identified with respect to work activities carried out by CSE Australia employees, a training needs analysis will be conducted by the relevant manager in conjunction with the HSE Manager to identify specific training requirements.

Where any new or unforeseen workforce requirements have been identified (e.g. during planning, work activity, monitoring and/or review process), training needs will be reviewed to determine the needs for additional work health and safety training for project personnel.

13.2.   Training Delivery and Competency

Subsequent to the identification of training needs, training or instruction will be provided to personnel and contractors on the basis of ensuring that they have the necessary competence to

perform their tasks in such a manner as to eliminate, or minimise the risk of, the potential effects of identified safety hazards.

Training programs will need to demonstrate that the trainee has achieved the required awareness or competence, and that they can demonstrate the required degree of knowledge or competence prior to carrying out a task.

13.3.   High Risk Work

Particular types of work activities are classed as *high-risk work*. These types of work are subject to additional controls with regard to training and competency, in which a person must not undertake these activities unless that person holds a high-risk work license.

Examples of high-risk work include:

- Work performed at heights
- Forklift operation
- Scaffolding work
- Dogging and rigging work
- Crane and hoist operation
- Work in confined spaces

Employees must be able to provide their high-risk work license for inspection by a relevant workplace manager or supervisor.

Where a person is licensed to use a type of prescribed equipment (e.g. forklift or elevating work platform), while using that equipment the person must not leave the equipment while it is in use unless another licensed person has taken over control of it.

13.4.   Inductions

All new employees undergo induction training, which comprises of:

- CSE Health and Safety Policy
- CSE WHS Management System
- Key roles and responsibilities of the WHS Management System
- Hazards associated with the employees work activities
- Relevant safe operating procedures which apply to their work activities
- Importance of conformity with the health and safety management system, including potential consequences of not following the requirements of the system
- Site-specific Emergency Response protocols including:
    o   Location of Emergency Preparedness Equipment (Firefighting, First Aid Kits)
    o   Location of Evacuation Routes and Assembly Points
    o   Identification of workplace fire wardens and first aid officers

13.5. Visitors

All visitors who will be at the workplace for longer than 15 minutes, beyond the reception/entrance are required to undergo a visitor induction using the electronic *Visit Us System*.

The visitor induction takes the visitor through site specific emergency procedures, and safety standards they are expected to abide by.

For more information, refer to the CSE *Setup Guide for Visitor Reception System* (CSEGA-IT-QP-0-105).

13.6. Training Records

The Head of People and Culture (HOPC) ensure that records are kept that clearly show training undertaken by employees, the dates training was undertaken, the qualifications attained and the date at which refresher training is due to occur (where applicable).

The overall maintenance training records is the responsibility of the HOPC. The HOPC monitors the need for refresher training and arranges for that training as and when it falls due.

14. Consultation and Communication Processes

CSE is committed to meaningful communication and consultation with all employees on matters relating to health and safety to promote a strong and positive culture of working safely.

For detail guidance please refer to the CSE *HSE Consultation and Communication Procedure* (CSEGA-HSE-QP-0-119).

14.1. WHS Meetings

CSE consults directly regarding WHS matters via the management team (HSE Manager, General Managers, Branch Managers and Functional Managers).

Each workplace holds a toolbox talk at least monthly, with different safety topics raised and giving the opportunity for employees to discuss any concerns or lessons learned.

Following the release of updated procedures or work instructions, a toolbox talk is held to discuss the changes and ensure all employees are familiar with this.

Branch Managers are responsible for completing *Safety Observation Tours (SOT)* where they walk through the workplace and conduct an inspection. The SOT is an opportunity for managers and employees to discuss WHS related manners.

14.2. Circulation of Health & Safety Information

CSE ensures that the below is communicated to all employees through display on workplace notice boards, the Company intranet, Company memos:

- Safety Notices and Safety Alerts
- Lessons Learned from incident reports
- Emergency response plans
- Minutes of WHS meetings
- Posters / promotional material regarding health and safety

- Copy of pertinent legislation and codes of practice

14.3. Communication and Consultation Mechanisms

Records of safety meetings are distributed to the relevant manager who is responsible for distributing this to relevant employees.

Common methods for establishing meaningful communication and consultation with employees are provided in Figure 3 below but can be applied anywhere and at any time.

Type	Actions
Pre-Start Meetings (Daily)	For site operations, daily pre-start meetings are to be held by the site supervisor for each work group. As a minimum, agenda items are to include: • Incidents or hazards from the previous shift • WHS issues or concerns from the work crew • Discuss and reinforce specific information messages and/or directives from management or the Customer • Changes to SWMS/JSAs • Personnel new to the work crew or returning from leave • Interfaces with other workgroups or contractors • Permits required • Tasks for the day All personnel, including subcontractors, are required to attend pre-start meetings.
On-site Toolbox Meetings (Weekly)	The purpose of Toolbox Meetings is to provide a means for the workforce to report their safety concerns to ensure that these are addressed project-wide. The objectives of a toolbox meetings are to: • Keep people informed of site issues • Announce changes affecting the site/project • Discuss site-wide topics that apply to all people (e.g. driver safety, first aid) • Feedback from major incidents and hazards • Feedback from incidents at other projects • Communicate Company or Customer messages • Transmit announcements from senior management • Discuss or reinforce specific information relating to the work crew (e.g. SWMA, JSAs) • Discuss the previous week's performance, with respect to achievements and work completed • Review the schedule and predicted issues for the current week All personnel, including subcontractors, are required to attend toolbox meetings as directed, and encouraged to participate in the meetings. The duration of the toolbox meeting is to be kept within 15-45 minutes according to the topics to be covered. The meeting is to focus on the current week and beyond – i.e. the previous week and future work. Managers and employees holding a supervisor role are expected to both regularly attend, and chair safety meetings.
In Office Toolbox Meetings (Monthly)	As above.

Figure 3. WHS Communication Tools

14.4. External Communication

Where workplace health and safety communications are received from external interested parties, it is the responsibility of the HSE Manager to prepare and document any required responses.

15. Emergency Management and Planning

CSE recognises the impact and potential consequences on business operations and the health and safety of our people with respect to the risk of emergency situations.

Emergency situations may be naturally occurring (e.g. flood or major storm) or may be the result of human activities or environments. Examples of emergencies that may result in serious injuries or ill health include:

- Fires and / or explosions
- Structural collapse
- Release of hazardous materials or gases within the workplace, or into the atmosphere
- Natural disasters / extreme weather (e.g. storms, floods or earthquake)
- Pandemics / epidemics / outbreaks of communicable disease
- Civil disturbance, sabotage, bomb threat, workplace violence
- Failure of critical equipment or infrastructure
- Traffic incidents

For detailed guidance refer to the CSE *Emergency Management Procedure* (CSEGA-HSE-QP-0-039).

15.1. Emergency Procedures

The CSE *Emergency Management Procedure* provides an outline for the development of site-specific emergency management plans. This includes:

- Identification of potential emergency situations, and information to be considered in the identification of potential emergency situations

- Assessment of risk associated with identified potential emergency situations

- Risk reduction, readiness and resilience with respect to potential emergency situations

- Establishment and implementation of emergency response procedures

- Emergency response training and awareness

- Emergency response equipment

- Periodic testing of emergency procedures

- Review of emergency procedures

16. Plant and Equipment

CSE cares for and protect assets through ensuring our equipment is maintained correctly and is used for what it was designed for, and that people are trained and competent in equipment use.

All personnel required to operate the plant are to be competent and where required by law, certified. No person is to be permitted to operate or use any item of plant or equipment without undergoing

instruction or demonstrating their competency to use the item safely. Copies of operator certificates of competency are retained within the business.

Managing the health and safety of all personnel in regard to plant and equipment entails ensuring that:

- All plant and equipment in commissioned and installed in a correct and safe manner

- Up to date plant and equipment registers are maintained within all CSE workplaces which include information on service, maintenance and calibration schedules

- That all plant and equipment undergo a risk management assessment

- Where the risk assessment finds the risks associated with the plant or equipment to be high, ensuring that the hierarchy of controls are used in order to control the risks appropriately

- Requiring all plant and equipment to undergo a pre-use check prior to use

- Plant and equipment meet the specifications of relevant legislation and standards, including its inspection and maintenance

- Only competent persons install, repair, inspect, test and dismantle plant and equipment

- Suitable records and information are maintained for each item of plant and equipment (e.g. records of registration and licensing, user manuals, results of inspections etc.)

For detailed guidance on Plant and Equipment management refer to the CSE *Plant, Equipment and Instrumentation – Maintenance and Calibration Manual* (CSEGA-QA-QM-0-066).

17. Hazardous Substances and Dangerous Goods

CSE has procedures in place to ensure the safe handling, storage, packaging and delivery of hazardous substances and/or Dangerous Goods. The procedures prevent risk of injury and illness and comply with legislative and standard requirements.

Workplace managers are responsible for:

- Ensuring no hazardous substances are brought into the workplace without an SDS first being obtained
- Ensuring that every hazardous substance and/or dangerous good has a completed risk assessment
    - These risk assessments must be re-done every 5 years, or whenever a SDS is updated
- Ensuring that employees who use a hazardous substance and/or dangerous good are familiar with the SDS requirements and the risk assessment
- Ensuring that a hazardous substances register is available and up to date
- Ensuring that employees can easily access the SDS for each product

For detailed guidance refer to the *Hazardous Substances Management Procedure* (CSEGA-HSE-QP-0-044)

17.1. Storage, Labelling and Use of Hazardous Substances

- The delivery, storage and handling of hazardous substances is to be carried out in accordance with the relevant SDS and the CSE *Hazardous Substances Management Procedure*

- Substances must be segregated in accordance with the *Dangerous Goods Segregation Chart*

- Bulk materials shall be stored on clean, firm and level ground, in separate stockpiles or bins to avoid mixing or contamination

- Products subject to degradation, or which may be affected by wet weather, are to be stored under shelter

17.2. Risk Assessment

A documented risk assessment must be completed for every substance in the workplace. This risk assessment must detail how the substance is to be used, stored and disposed of.

The person requesting the substance shall complete the risk assessment, which must be approved by the relevant manager.

The risk assessment must be completed on the CSE *Hazardous Substances Risk Assessment Form* (CSEGA-HSE-QF-0-072).

18. Site Safety Management

At times, CSE employees will be required to work on Customers sites. At these times, CSE employees will work in accordance with Customer requirements.

18.1. Safe Driving

When using company vehicles and any situation where travel is required for work it is expected that employees will apply safe driving practices. The CSE *Safe Driving Guidelines* (CSEGA-HSE-QP-0-035) describe the expectations of CSE employees when driving for CSE purposes

The following rules apply to project driving activities:

General

- No person is to operate a vehicle or mobile plant on site unless that person is authorised / licensed to do so

- Drivers of plant / vehicles are to obey all signs exhibited which apply to them.

- No vehicle or pedestrian is to approach within (5 metres) of earthmoving equipment without first making positive contact e.g. by radio or direct line of sight and acknowledgement from the operator.

- Operators and drivers are to wear seat belts at all times when operating or driving.

Parking

- At the end of the shift, all plant and vehicles are to be parked in a safe and orderly manner in the designated parking area only.

- Plant and vehicles are to be parked, where practical, in a manner that the first movement from the parked position is forward. (i.e. reverse parking)

- An operator or driver, before alighting from their plant or vehicle is to ensure that the appropriate brakes have been applied so that the equipment cannot be moved from its parked position.

- Mobile plant or vehicles are not to be left running whilst unattended.

Speed Limits

- Employees are to adhere with all posted speed limits

- In all instance's drivers / operators are to drive to prevailing conditions.

Right of Way

- Light vehicles are to give way to all heavy machines and vehicles.

- Emergency vehicles have right of way over all other vehicles at all times.

- Unless otherwise stated road rules of local jurisdiction apply.

Loads

- Vehicles and mobile plant are to be loaded so as not to exceed the safe load limit of the specific equipment.

- Operators / drivers are to ensure that any cargo being carried is securely restrained by a method applicable for the type of load and that the load is placed to prevent fall, dislodge or strike of a person during transit.

Transport of Persons

- No person other than the driver is to ride on mobile plant or in a vehicle unless:

  - The equipment is a dedicated personnel carrier or other light vehicle, or a dedicated seating position is provided

- The driver of light vehicles, personnel carriers or buses is responsible for all vehicle occupants wearing seatbelts.

Towing of Equipment

- Towing will only be attempted using an engineered towing hitch with a hawser or cable of suitable strength and under direct supervision.

Refuelling

- Plant and vehicles must be shut off before and during all refuelling activities.

18.2.   Housekeeping

CSE will ensure adequate time is assigned to ensure that good housekeeping is practiced by employees including:

- Supervisors monitoring housekeeping standards

- Tools, equipment and materials removed to storage areas when not required.

- An orderly arrangement of material and equipment is to be maintained at all times

- All waste is to be segregated and place in the appropriate bins.

- Waste and scrap areas are to be clearly identified and segregated from the place of work.

18.3.   Smoking

Smoking is not permitted within the vicinity of site buildings or enclosed areas and at any location where a smoker's cigarette smoke may affect the health of other persons.

19. Workplace Specific Health and Safety Management Plan

Each CSE Workplace has a site-specific work health and safety plan, detailing how the WHS is implemented and managed at a site level. These plans include information on:

- Site specific roles and responsibilities
- Workplace details, and neighbouring operations
- Workplace amenities
- Workplace security
- Training needs analysis for each department
- General workplace safety rules
- Site specific emergency response protocols and details
- Workplace HSE vendors
- Workplace hazards and controls

20. Health and Safety Audits

The HSE Manager is responsible for developing a WHS Audit Schedule, the goals of the audit program are to ensure that:

- The WHS component of the CSE HSE management system conforms to planned arrangements, including national and international standards, and to other standards and codes to which we subscribe
- The WHS component of the CSE HSE management system has been properly implemented and maintained, and is effective in meeting the CSE *Health and Safety Policy* and objectives
- Workplace practices comply with legislative and accreditation requirements, are being effectively implemented and are contributing to positive WHS performance
- Work premises comply with all applicable legislation, codes of practice and Australian or International Standards
- Subcontractors are implementing accepted WHS Management Plans and SWMS.

Audits are planned based upon:

- The results of risk assessments of organisational activities
- Concerns raised by inspection reports
- Increase in incidents
- A serious incident (fatality or potential fatality)
- Areas of significant change (i.e. new / modified equipment, substances, processes or environment)
- Results of previous audits

Audit reports are provided to both management and relevant employees, to drive continuous improvement in workplace health and safety.

The HSE Manager is responsible for carrying out all internal HSE audits and at a minimum each branch will be audit every second year.

Audit findings are classified in accordance with the following guidelines and recorded on the relevant audit tool template:

- **Major non-conformance:** An unfulfilled requirement that puts the process or system at jeopardy. It could have a significant impact on health and safety. It results in a systemic problem (which could be a result of many minor NCs in the same element).

- **Minor non-conformance:** A random lapse in discipline or control, a minor portion of an element not implemented or documented.
- **Opportunity for Improvement:** Something of note or something to be improved.

Further information on the internal audit process can be found in the CSE *HSEQ System Monitoring and Improvement Manual* (CSEGA-QA-QM-0-069).

20.1.   Auditing of Subcontractors

WHS Audits of subcontractors are planned and undertaken depending on the level of risk involved with the works, and previous performance of the subcontractor.

21.   Hazard, Near Miss and Incident Reporting and Investigation

CSE Australia is committed to ensuring that appropriate processes are in place for the timely and thorough investigation of hazards, near miss events and incidents. This ensures the identification of root causes (or underlying factors), assessment of risk, and the development and implementation of corrective actions.

The CSE hazard, near miss and incident reporting form is called **Safety Shield** (CSEGA-HSE-QP-0-048):

- **S**peak
- **H**ear
- **I**nvestigate
- **E**ngage
- **L**earn
- **D**o

Safety Shield provides a platform where our employees feel supported to report all safety, property or environmental events. Safety Shield is a transparent program, where Managers listen without judgement, and engage employees in the investigation process. This ensures that CSE learns from these events and implements corrective actions.

All employees are expected to use Safety Shield to report any hazards, near miss events or incidents which they are involved with, or aware of.

21.1.   Investigation

All reported hazards, near miss events and incidents are investigated. The level of investigation depends on the risk rating of the reported hazard, near miss or incident.

Incident investigations take place in a timely manner to ensure witness statements and factual evidence are gathered before memories fade. The purpose of an incident investigation is not to place blame, but to:

- Identify all contributing/causal factors.
- Develop and implement corrective measures to prevent recurrence of the incident.
- Identify opportunities for continual improvement.
- Ensure that all incidents are investigated to the appropriate level based on the severity of the incident; and
- Communicate the results of the investigations to all relevant parties and help to raise overall HSE awareness.

The CSE Australia HSE Manager is responsible for completing incident investigations, with the support of managers and employees involved.

For incidents considered 'High', 'Severe' or 'Critical' once all information has been collected, the HSE Manager will conduct a root cause analysis, and determine corrective actions.

22.   Injury Management and Rehabilitation

CSE Australia is committed to providing confidential, equitable and timely management of employee injuries and illnesses, in accordance with Australian and New Zealand legislation. The goal of the CSE Australia *Injury Management Program* (CSEGA-HSE-QP-0-014) is to return injured workers to their pre-injury duties.

When an employee sustains a work-related injury or illness, they must immediately inform their line manager. The immediate priority when an employee is injured at work is to provide the required first aid or medical attention. Once the employee's immediate needs have been attended to, the injured worker's line manager must then advise the business unit General Manager and HSE Manager of the incident and what actions have been taken.

The CSE Australia Injury Management Coordinator (IMC) is:

- Tarryn Rowe – HSE Manager
- tarryn.rowe@cse-australia.com
- 0410 490 265

The IMC is responsible for working with the injured/ill employee and their manager to assist the employee with returning to their pre-injury duties and managing workers compensation claims.

The IMC will assist in developing a return-to-work plan detailing any work restrictions, suitable work duties, review dates and timeframes.

22.1.   Monitoring Corrective and Preventive Actions

Workplace managers are responsible for monitoring activities and ensuring that corrective and preventive actions are proving effective.

Where a corrective or preventive action has not proved to be effective this will be referred to the Business Manager who in consultation with the HSE Manager will determine appropriate alternative corrective actions.

The workplace manager keeps a record of the corrective and preventive actions initiated for each hazard, incident or near miss. Copies of these records are provided to the HSE Manager (or suitable delegate) and retained by the HSE Manager.

Where corrective and/or preventive action(s) identify new or changed hazards, or the need for new or changed controls, the proposed changes will be managed in a controlled manner. This entails a risk assessment for any new procedures or changed controls prior to implementation.

The HSE Manager reviews the corrective actions that are applied in response to workplace incidents to ensure that these are effective.

23. WHS Performance Measurement, Monitoring and Review

23.1. Performance Measurement and Monitoring

CSE monitors and measures WHS performance on an ongoing basis. This involves the collection of both qualitative and quantitative information. Monitoring and measurement activities serve a number of purposes:

- Tracking progress on meeting policy commitments, achieving objectives and targets, and continual improvement

- Monitoring exposures to determine whether applicable legal and other requirements to which we subscribe have been met

- Monitoring incidents, injuries and ill health

- Providing data to evaluate the effectiveness of operational controls, or to evaluate the need to modify or introduce new controls

- Providing data to proactively and reactively measure the Company's WHS performance

- Providing data to evaluate the performance of the WHS management system

- Providing data for the evaluation of competence

Each Branch Manager is responsible for collecting and reporting on a number of lead and lag indicators to the HSE Manager on a monthly basis. The *Monthly HSE Report* (CSEGA-HSE-QF-0-079) is used to collect this information.

The HSE Manager consolidates this data into a monthly HSE Performance Report which is provided to the Business Unit General Manager and CEO.

23.2. Evaluation of Compliance

Consistent with our commitment to compliance with legal requirements, and other standards to which we subscribe, CSE Australia periodically evaluates compliance with such requirements applicable to our business.

Records of the results of compliance evaluation activities are recorded and used as inputs into HSE management review meetings.

The CSE *process for evaluating compliance is outlined within the HSEQ System Monitoring and Improvement Manual* (CSEGA-QA-QM-0-069).

23.3. Management Review

The HSE Manager and Business Unit General Manager are responsible for organising reviews of the WHS Management System. These reviews of are to ensure the continuing suitability, adequacy and effectiveness of the WHS Management System.

As a minimum, each CSE Business Unit holds a Management Review Meeting (MRM) once per year.

The outcome of the MRM is a set of minutes, with actions and opportunities for improvement.

Project / Contract WHS reviews are the responsibility of the Project Manager, in conjunction with the HSE Manager.

All health and safety reviews include the post-job safety performance of all workers, including all subcontractors.

23.3.1.   Management Review Planning and Inputs

When planning for management review, consideration is given to the following:

- The topics to be addressed

- Who is to participate in the review, ensuring the effectiveness of the review (i.e. top management, area managers, designated WHS representatives)?

- Responsibilities of individual participants in respect of the review

- Information to be brought into the review

- What will be recorded as a result of the review

Inputs to WHS management reviews include:

- Results of internal audits and evaluation of compliance with applicable legal requirements, and with other requirements to which we subscribe

- The results of participation and consultation

- Relevant communication from external interested parties, including complaints

- The WHS performance of the Company

- The extent to which WHS objectives have been met

- Status of incident investigations, corrective actions and preventive actions

- Follow-up actions from previous management reviews

- Changing circumstances, including developments in legal and other requirements related to WHS

- Other recommendations for improvement

In relation to the WHS performance of the Company, the following inputs are considered for inclusion:

- Reports of emergencies (actual or exercises)

- Incident statistics

- Results of customer and/or regulatory audits and inspections

- Results and/or recommendations from monitoring and measurement

- WHS performance of contractors

- WHS performance of supplied products and services

- Reports from individual managers on the effectiveness of their areas of responsibility

- Reports from ongoing hazard identification, risk assessment and risk control processes

- Progress in the achievement of WHS training plans

23.3.2. Management Review Outputs

The outputs from management reviews include any decisions and actions related to possible and planned changes to:

- WHS performance

- WHS policy and objectives

- Resources

- Other elements of the WHS management system

Where the review identifies shortcomings in WHS Management System it is the responsibility of the HSE Manager to make appropriate changes and updates.

23.3.3. Documentation of Reviews

All reviews, whether at the Corporate or Project level are thoroughly documented.

Records of reviews are held on file and are referred to when subsequent reviews are held as a benchmark of previous performance. The outcomes of reviews are reported to all appropriate stakeholders.