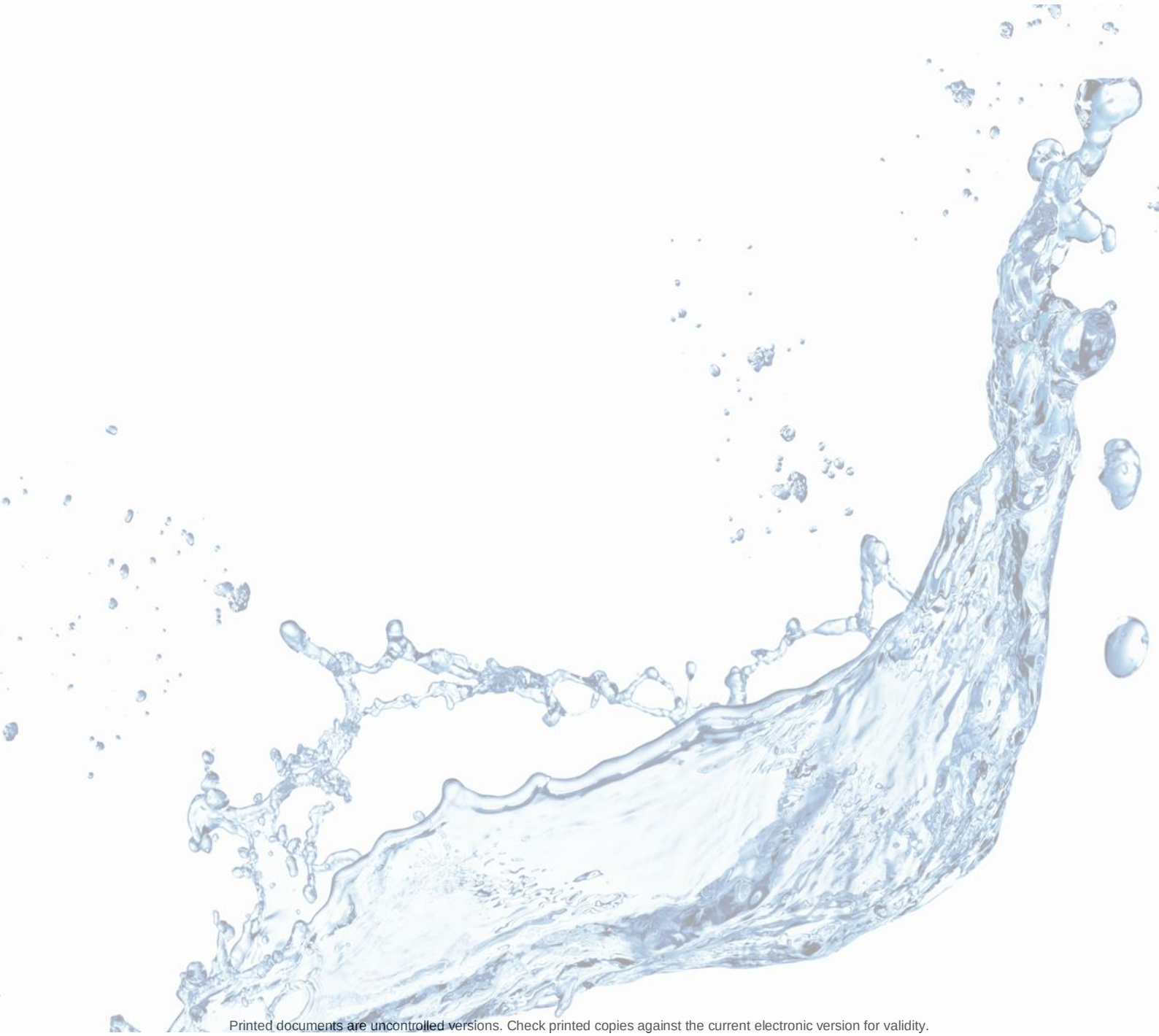
Work Health & Safety Management Plan

Silt and Debris Removal from Wastewater and Stormwater assets and Emergency Response Services



Contents

1. Introduction

TDG Environmental (TDG) is an Australian owned and operated company that specializes in sewer and storm water, drain and pipe cleaning operations.

Some of the main services provided are:

- Stormwater Pipe Cleaning Jetting/Root cutting with Water Recycling Capabilities.
- Tank Cleaning.
- SPS Cleaning.
- Industrial Vacuum Loading.
- High Pressure Water Blasting.
- Filter Media Removal and Loading.
- SQID Maintenance/Cleaning/Repairs/Inspection Reporting.
- Non-Destructive Vacuum Excavation/Trenching/Potholing.
- Condition Assessment (CCTV Pipe Surveying).
- Robotics and Localised in Pipe Repair.
- Manhole Conditions Inspections.
- 24/7 Emergency Response for Flooding/Environmental Spills.
- Waste Management

TDG aims for a quality, safety, reliability, and value for money. Combined with the latest technology, operator experience and safety equipment TDG can tackle any job.

TDG is also able to deliver high standard cleaning services ranging from programmed and periodical maintenance contract services to emergency and response services.

The Integrated Management System (IMS) formalizes quality, work health & safety and environmental practices that the TDG has developed, implemented, and used successfully.

Blending ISO 9001 Quality Management System, ISO 45001 Occupational Health and Safety and ISO 14001 Environmental Management System will strengthen TDG's overall ability to meet customer, and other interested parties, needs.

1.1 Purpose

The Safety Management plan describes the systems and processes used to manage TDG WHS activities to ensure sound Safety Management Practices.

1.2 Scope

Silt and Debris Removal from Wastewater and Stormwater assets, and Emergency Response Services.

2. Leadership, Responsibility and Accountability

2.1 Policies and documentation

All TDG employees are responsible for committing to all company-wide policies. These policies are displayed at TDG offices and are available on the internal TDG Intranet.
The key company policies include but not limited to:

- Work Health and Safety Policy POL-TDG-001
- Quality Policy POL-TDG-002
- Environment Policy POL-TDG-003
- Bullying and Harassment Policy POL-TDG-006
- Fatigue Management Policy POL-TDG-009
- Return to Work Policy POL-TDG-014

The Business policies and business management system documentation are complemented by operating documentation to achieve and maintain the contractual, customer, certification, regulatory and legislative requirements.

2.2 Roles and Responsibilities

Role	Responsibilities
CEO	The CEO, in consultation with the Executive Management Team, is responsible for approving all TDG policies. The CEO chairs annual reviews of the business management system's performance. The CEO is responsible for: - ▪ overall performance of the business ▪ overseeing achievement of TDG commitments to workplace health and safety, environment, and quality ▪ overseeing the development and achievement of TDG's goals, objectives and targets for business performance and risk management ▪ chairing the Executive Management Team ▪ reporting to the TDG Board ▪ ensuring adequate human and financial resources, as well as technical infrastructure, including physical assets and appropriate working environments, are available for the effective operation of the business management system. ▪ delegation of authority and signing approval. ▪ Overseeing achievement of TDG commitments to HVNL
General Manager	The General Manager is ultimately responsible and accountable for the project and for ensuring that TDG policies and procedures are implemented in the workplace and/or systems of work under their control. As an integral part of their normal duties, the General Manager will: ▪ Actively follow agreed safety practices and model positive attitudes towards health and safety matters ▪ Arrange for their workers to be instructed in healthy and safe systems of work and procedures. ▪ Notify the Chairperson and/or other members of the Board of all serious incidents, hazardous situations, dangerous occurrences or immediate risks to health and safety of any workers. ▪ Ensure that all workers are informed of TDG policy. ▪ Undertake consultation with managers and workers on measures to protect their health and safety or on change that may affect their health and safety.

	▪ Ensure that WHS is a standing agenda item at all staff meetings. ▪ Communicate WHS matters to the Chairperson of the Board. ▪ Actively follow the rules and regulations of the HVNL
Operations Manager	Operation Manager are responsible for managing the overall WHS Compliance to the requirements of this WHSMP, providing a workplace that is, as far as reasonably practicable, a safe and healthy workplace for workers and visitors. This includes: ▪ Modelling health and safety and quality leadership ▪ Demonstrating a commitment to good health and safety performance, by: – talking about WHS at regular meetings – ensuring safe work procedures are followed. – promptly reporting and investigating incidents, hazards, safety, and quality concerns. – assessing task risk and not allowing an activity to continue until it can be controlled. ▪ Manage project delivery to stakeholder requirements. ▪ Maintain reporting systems to ensure timeliness, accuracy of all management information systems. ▪ Fostering a strong work health and safety culture where worker input is valued. ▪ Establishing and implementing WHS consultation and communication arrangements for the duration of the project ▪ Monitoring service providers' compliance with the requirements of this WHSMP ▪ Promoting and implementing the TDG Integrated Management System ▪ Acquiring and communicating WHS information ▪ Effectively manage illness/injury and emergency procedures and facilities. ▪ Actively support the identification of hazards and risks and the management of these, including implementing appropriate risk controls ▪ Understand and monitor safety performance objectives. ▪ Implementing corrective actions ▪ Manage workers to ensure quality assurance requirements are being met. ▪ Proactively manage other duty holders (e.g., subcontractors), when required. ▪ Ensure that all workers under their control have received the required training in accordance with the developed Training Matrix. ▪ Monitor the rules and regulations of the HVNL are being adhered to
Scheduler/Coordinator	The scheduler/Coordinator is overall responsible and accountable for meeting reporting and contract requirements of the project and for ensuring that TDG policies and procedures are implemented in the workplace and/ or systems of work under their control.

	As an integral part of their normal duties, the Scheduler/Coordinator will: - ▪ Meet reporting obligations to relevant stakeholders. ▪ Ensure reports are accurate and within expected timeframes. ▪ Liaise with Contract Manager for relevant information to complete reports. ▪ Liaise with Project and Contracts Manager on all proposed service issues. ▪ Ensure Integrated Management System (IMS) is implemented within the contracts as applicable. ▪ Monitors and participate in operations in assigned sections including inspecting projects. ▪ Completion and periodic review of personal development and improvement reports, to ensure that safe work practices and standard operating procedures are followed. ▪ Completion of Condition Inspection Reports for all work performed. ▪ Ensure schedules do not breach the requirements of working hours and consecutive days worked under the HVNL
Project Manager / Operations Supervisor	Project Managers / Operations Supervisors are responsible for providing a workplace that is, as far as reasonably practicable, a safe and healthy workplace for workers and visitors. This includes: - ▪ Modelling health and safety leadership ▪ Demonstrating a commitment to good health and safety performance, by: – talking about safety at regular meetings – ensuring safe work procedures are followed. – reporting and investigating incidents, hazards, and safety concerns promptly – assessing task risk and not allowing an activity to continue until it can be controlled adequately. ▪ Fostering a strong work health and safety culture where worker input is valued. ▪ Acquiring and communicating WHS information and Site Safety Rules. ▪ Promoting and implementing the TDG Integrated Management System. ▪ Actively support the identification of hazards and risks and the management of these, including implementing appropriate risk controls. ▪ Understand and monitor safety performance objectives. ▪ Implement corrective actions. ▪ Proactively manage other duty holders (e.g., subcontractors), when required. ▪ Actively make sure that the fatigue, fitness for duty and the rostering and scheduling of drivers/operators is in alignment with the HVNL

SQE Manager	▪ The SQE Manager is responsible for managing the overall implementation of WHS Compliance and Integrated Management System to the requirements of this WHSMP, providing a workplace that is, as far as reasonably practicable, a safe and healthy workplace for workers and visitors. ▪ As an integral part of their normal duties, the SQE Manager will: ▪ Maintain the Integrated Management System with regards to all WHS matters. ▪ Advise the management team of all legislative/ compliance matters to support ongoing TDG compliance operationally, contractually, and legislatively. ▪ Support all employees of the company with WHS queries as they pertain to your role. ▪ Ensure maintenance of sensitive and confidential information. ▪ Interact professionally with the public and staff; maintain effective working relationships and work in cooperation with the management team to effectively meet departmental/ contractual objectives. ▪ Promote Safety, Health, Quality and Environment within the business. ▪ Implement strategies to manage risks and establish mechanisms for monitoring performance. ▪ Ensure that legislative requirements are being met across the business in plant, equipment, and substances as well as in all work activities. ▪ Assist in the supervision and investigation of accidents and unsafe working conditions, study possible causes and recommend remedial action. ▪ Ensure the training sessions are conducted for management, supervisors and workers on Safety, Health and Environment practices and legislation. ▪ Ensure that Operations and activities adhere to Safety, Health, Quality and Environment policies and procedures. ▪ Ensure that work activities are carried out in a way which is environmentally responsible. ▪ Ensure the Implementation of Risk Management strategies. ▪ Conduct Audits. ▪ Produce reports and maintain KPI's. ▪ Ensure compliance with legislative requirements are being met in HVNL
Workers	Workers must take reasonable care for their own health and safety while they are at work and take reasonable care that their acts or omissions do not adversely affect the health and safety of other persons. They must comply, so far as they are reasonably able, with any reasonable instruction given by the Project Manager or Works Supervisor, as well as co-operating with any reasonable TDG policy or procedure which relates to workplace health and safety. On a day-to-day basis, this includes: -

	▪ to the extent of the worker's control or influence over working conditions and methods, take reasonable care to work safely. ▪ making sure that the work area is always safe and secure. ▪ make proper use of all appropriate safeguards, safety devices and personal protective equipment to protect yourself, our customers, and members of the public. ▪ follow agreed safe working practices and rules. ▪ report all known hazards, accidents, and incidents as soon as possible. ▪ Support the implementation of corrective actions. It is acknowledged that, in accordance with the Act, a worker may cease, or refuse to carry out work if they had a reasonable concern the work would expose the worker to a serious risk to their health or safety. The Act requires workers who cease work to notify the relevant manager that they have ceased unsafe work as soon as practicable after doing so. It also requires workers to remain available to carry out 'suitable alternative work'. A worker will not remain at any place that poses a serious risk to their health or safety.
Driver/Operator	Are responsible to comply with the HVNL requirements for their: • Working hours • Working consecutive days • Fatigue • Fitness for duty • Complete all required paperwork • Mass limits and dimensions
Contractors	Contractors, sub-contractors, and self-employed persons are defined as "workers" under the WHS Act if they carry out work in any capacity for TDG. They are required to - ▪ comply with the requirements of the WHS legislation. ▪ have in place any work health and safety policies and programs required under State safety legislation. ▪ consult with TDG about safety matters and comply with TDG policies. ▪ work safely and to include the safety of TDG staff and visitors in their safety plans. If any staff member believes that a contractor may be engaging in an unsafe work practice, they are required to report this issue to their manager or supervisor.
Visitors	Visitors and other persons entering TDG have a responsibility to abide by our workplace safety rules and procedures. These responsibilities include: -

	▪ exercising reasonable care for their own health and safety and for the health and safety of other persons. ▪ comply with, so far as they are reasonably able, all reasonable safety directions provided by TDG staff. ▪ report all safety related incidents to TDG staff. ▪ ensure the adequate supervision of any accompanying children. ▪ not enter any restricted area without authorisation or escort. ▪ not bring or consume alcohol or illegal drugs at TDG workplaces. ▪ not wilfully or recklessly interfere with TDG property.

3. Section 2 Safety Management System Implementation

3.1 Hazard Identification and Reporting

An initial worksite WHS Hazard Identification and Risk Assessment is carried out by the working team and documented before works commence. The risk control measures are then tabled, tool boxed and implemented at the workplace or project. No work is to commence until all direct or potential hazards have been controlled and the workplace is deemed safe.

3.1.1 Hazard Identification and Managing Risk

TDG systematically identify hazards and assess risks before the project starts by using the risk calculator and control measures for WHS hazards. The purpose of any WHS risk assessment is to ensure that, for any identified hazards, appropriate control measures are implemented to protect workers, contractors, and visitors from risks to their health, safety, and welfare. Outcomes of risk assessments will be documented, and the control measures reviewed at least annually or earlier should a task or activity be the subject of a WHS incident, or a change of process is required. Current risk assessments will ensure that the achieved goal of eliminating or minimising the risk to workers may be exposed to are mitigated. TDG will develop and maintain a project specific high-level Risk Register HIRM (FOR-TDC-205) that will be used to mitigate risks on the project. Site specific risks and controls will be identified in the project specific SWMS.

3.1.2 Hazard Reporting

TDG encourages all workers to report hazards immediately to the Works Supervisor. Where the hazards cannot be corrected immediately, they are reported and recorded in the Risk Register (REG-TDC-522). The Works Supervisor investigates all reported hazards and implements control measures to eliminate and/ or minimise the likelihood of an incident or injury.
The Project Manager regularly reviews and evaluates the effectiveness of control measures until the hazard is addressed and/ or all risks have been mitigated.

4. Section 3 Risk Management

TDG Executive Team are committed to a coordinated approach to risk management throughout the company's operation ensuring any issues that could affect the company's performance, values or reputation are identified and addressed. Risk management follows the principles, framework, and processes of the ISO 31000 Risk management standard, in accordance with the Work Health Safety Policy and Risk Management Procedure.

The risk calculation is based on the following three step process for identified hazards.

Step 1 – Estimate the likelihood of an incident occurring.

Likelihood	Description
Almost Certain	Event is expected to occur in most circumstances. There is a strong likelihood of a re-occurrence of the event
Likely	Event will probably occur in most circumstances. There is considerable opportunity of a re-occurrence of the event
Possible	Event should occur at some time. There is some opportunity of a re-occurrence of the event
Unlikely	Event could occur at some time. There is some potential opportunity of a re-occurrence of the event
Rare	Event may occur in exceptional circumstances. There is little opportunity of a re-occurrence of the event

Step 2 – Estimate the consequences of an incident occurring.

Consequence	Incident
Catastrophic	Fatality, Amputation. Toxic Release offsite with detrimental effect. > $50,000
Major	Extensive injuries, Permanent Disability. Offsite release with NO detrimental effects < $50,000
Moderate	Medical Treatment. On site release contained with outside assistance. < $15,000
Minor	First Aid. On site release contained < $5,000
Insignificant	No injuries. Minor spill on site < $3,000

Step 3 –Risk Score = Likelihood x Consequence - determine the risk rating

RISK MATRIX

		SEVERITY (CONSEQUENCE)				
		INSIGNIFICANT 1	MINOR 2	MODERATE 3	MAJOR 4	CATASTROPHIC 5
LIKLIEHOOD	ALMOST CERTAIN 5	LOW 5	MEDIUM 10	HIGH 15	EXTREME 20	EXTREME 25
	LIKELY 4	LOW 4	MEDIUM 8	HIGH 12	EXTREME 16	EXTREME 20
	POSSIBLE 3	LOW 3	MEDIUM 6	MEDIUM 9	HIGH 12	HIGH 15
	UNLIKELY 2	LOW 2	LOW 4	MEDIUM 6	MEDIUM 8	MEDIUM 10
	RARE 1	LOW 1	LOW 2	LOW 3	LOW 4	LOW 5

4.1 Risk Controls

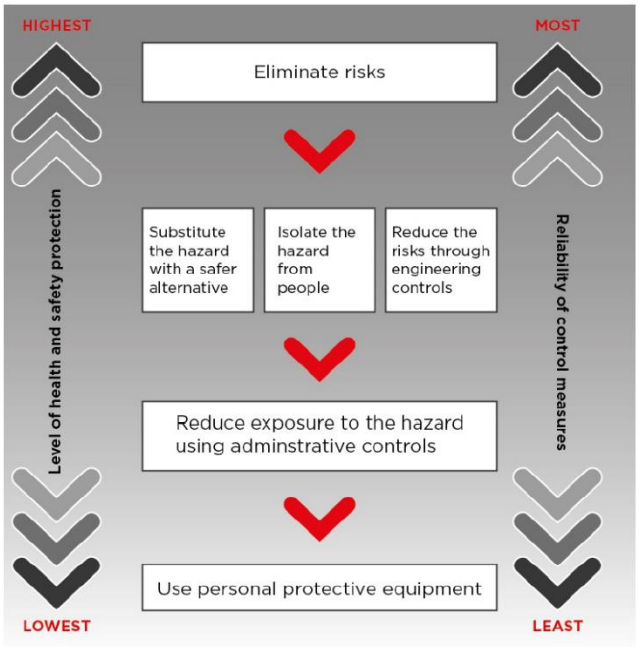
All identified hazards shall be controlled to eliminate the possibility of injury, illness, or environmental damage. Risks that have been assessed as being critical (Extreme & High) shall be addressed first.

Risk Score		Actions:
16-25	EXTREME	Stop, do not proceed, Report to Senior Management
11-15	HIGH	Precautionary approach, additional controls needed, Report to Manager/Supervisor
6-10	MEDIUM	Caution is required, Operator to use appropriate controls
0-5	LOW	Remain aware, Operator to use appropriate controls

The measures taken to control the risks shall be appropriate to the associated hazard and level of risk that they pose. Foremost the risk should be eliminated. Where this is not possible a hierarchy of controls shall be followed in determining an appropriate control mechanism.

4.2 Hierarchy of Controls

The hierarchy of controls must be applied in the order below for all identified hazards. The higher the risk score, the more emphasis should be placed on the more effective controls, such as elimination or substitution. Where possible, the hazard or environmental aspect shall be eliminated. Where it is not possible, the risk shall be reduced as far as practicable. The preferred order of control methods (hierarchy of controls) from preferred (1 Elimination) to least desirable (6 PPE) shall be: -



1. **Elimination** - is a permanent solution and should be attempted in the first instance.
2. **Substitution** - involves replacing the hazard or environmental aspect by one of lower risk.
   Isolation – Isolate the hazard from anyone who could be harmed by physically guarding or inclosing the hazard or lock the equipment.
   Engineering - controls to reduce the risk, involves physical barriers or structural changes to the environment or process.
3. **Administrative** - controls reduce hazard by altering procedures and providing instructions.

4. **Personal Protective Equipment** - use of properly fitted PPE where other controls are not practical.

Where possible, TDG will aim to eliminate the risk altogether and in some cases multiple controls will be implemented.

4.3 Safe Work Method Statement

As part of TDG's WHS Management System, project specific Safe Work Method Statement (SWMS) will be developed to ensure all hazards, risks and control measures are given due consideration. The SWMS will outline the hazards involved and include a step-by-step guide on how to do the job and to ensure the safety of anyone who is affected by the task or process.

A project specific Safe Work Method Statement includes: -

- A list of the steps required to perform the task.
- A list of potential hazards that could cause injury/ damage when the task is performed.
- Inherent Risk
- A list of the control measures for each hazard identified and the control measures required to eliminate or minimise the risk.
- Residual risk
- Responsible person
- PPE requirements
- A description of the equipment required to complete the work and any standards or codes to be complied with.
- The qualifications of the personnel doing the work and the training required to do the work.

At the start of each shift the work team assesses the adequacy of the SWMS to ensure the SWMS is relevant to work and to current site conditions. All hazards not controlled by the existing SWMS will be documented within the current SWMS via immediate review prior to job start. The Site Risk Assessment checklist (FOR-TDG-024) is used for this purpose and includes assessment for emergency and unplanned work.

It is the responsibility of the Work Supervisor to ensure that the control measures adopted are monitored ongoing. It is the responsibility of those undertaking the work to inform management that the proposed controls are appropriate and the responsibility of those supervising the work to monitor the implementation of the control measures. Works are ceased if the SWMS is not being followed.

Subcontractors working on site shall be required to work off their own Safe Work Method Statements. The Project Manager shall review subcontractor SWMS for adequacy and ensure all immediate or potential risks are documented and controlled.

A project specific SWMS must incorporate both safety and environmental controls.

4.4 Site Safety Rules

TDG has developed a set of Site Safety Rules to safeguard the health and safety of our workers.

All workers, subcontractors, suppliers, and visitors to the site must abide the Site Safety Rules. A copy of these rules will be given during induction. Furthermore, as required or physically possible the rules will be displayed on notice boards or at other suitable locations on the work site.

4.4.1 Safe Operating Procedures

All plant and equipment must be used in accordance with the Safe Operating Procedures as provided by the manufacturer or hire company, or as developed in conjunction with an approved Risk Assessment to prevent injury to personnel or damage to plant and equipment.

4.4.1.2 Manual Handling

Manual handling is any task that requires you to push, pull, lift, carry, move, hold, or lower any object, or person. Manual tasks include tasks that have repetitive actions, sustained postures and may involve exposure to vibration. Manual handling hazards are managed by TDG by a risk management process to prevent or minimise the risk of injuries caused by manual tasks. The process involves conducting a risk assessment on manual tasks carried out in the workplace, working out how to address any problems, choosing and implementing appropriate solutions, and following up to check that the solutions work.

4.4.1.3 Asbestos Material

TDG acknowledges that asbestos may be present at customer operational sites. Asbestos encountered in any form must not be interfered with. If asbestos is identified, work must cease immediately. Removal of asbestos can only be undertaken by licensed asbestos removers.

4.4.1.4 Barricading

The Responsible Manager is to ensure the site utilises appropriate standards for barricading and signage to reduce the risk of injury or damage to equipment. Some examples of hazards that would require barricading on a site include, but not limited to: -

- Working near open pits or trenches
- Working at heights
- High-pressure water activities
- High-velocity vacuum activities
- Jetting hose crossing pedestrian areas (slips, trips)

A barricade may be used to prevent access to a work area or used as a control measure to prevent a person falling from an edge or an opening. Barricades must be used in accordance with the manufacturer's specifications, an engineer's specifications (if required), a competent person, site specific procedures and all regulatory requirements.

4.4.1.5 Confined Space

Confined spaces pose dangers because they are usually not designed to be areas where people work. Confined spaces often have poor ventilation which allows hazardous atmospheres to quickly develop, especially if the space is small. The hazards are not always obvious and may change from one entry into the confined space to the next.

The risks of working in confined spaces include:

- Loss of consciousness, impairment, injury, or death due to the immediate effects of airborne contaminants.
- Fire or explosion from the ignition of flammable contaminants.
- Difficulty rescuing and treating an injured or unconscious person.
- Asphyxiation resulting from oxygen deficiency or immersion in a free-flowing material such as liquids, grain, sand, fertiliser, or water.

All conditions, precautions, etc. as outlined in AS2865 - 2001 “Safe Working in a Confined Space” and the TDG Confined Space Procedure shall be complied with when working in confined spaces.

If entering a confined space cannot be avoided, then a safe system for working inside the space must be implemented. The identified hazards will help determine what controls are needed to minimise any risk associated with work in the confined space. No person shall enter a Confined Space without the relevant training, PPE, and completion of the “Confined Space Entry Permit” (FOR-TDC-209).

4.4.1.6 Cranes and Lifting Equipment

TDG will comply with customer specific requirements for the prevention of falls, overhead crane management, and manual handling of heavy cables/equipment including all relevant work practices. Prior to mobilising to site all cranes and other lifting equipment shall be inspected by a competent person. The inspection shall include:

- Serviceability and condition of the crane or equipment
- Certification of the crane or equipment (for entry into the classified plant logbook)
- Component inspections (e.g., crane rope, block, etc.)
- Compliance with statutory and site requirements.

TDG will ensure that all personnel required to operate a crane or other lifting equipment hold a current licence to operate the equipment they are operating.

4.4.1.7 Lifting Operation.

Lifting Operations shall be done in accordance with customer requirements and will only proceed if:

- An assessment of the lift has been completed and the lift method and equipment has been determined by a competent person.
- A trained and competent person has:
  - Checked all safety devices are operational.
  - Visually inspected the lifting equipment.
  - Rigged the load.
  - Secured the load prior to the lift.
- The weight and type of load is known and less than the Safe Working Load of the lifting device.
- Operators of powered lifting devices are trained and competent for that equipment.
- Clear communication is established and maintained between all persons involved in the lift and,
- No one is positioned under a suspended load or between suspended / lifted load and fixed objects.

4.4.1.8 Electrical Safety

Electrical activities have the potential for serious incidents. TDG ensures that all work or alterations to any electrical equipment shall only be performed by licensed or competent persons.

Electrical safety is primarily dependent upon appropriate job planning, isolations of circuits and equipment, and correct testing procedures and techniques. No electrical equipment should be assumed to be de-energised after isolation and should always be tested prior to commencement of the works.

4.4.1.9 Isolation high risk energy source

Work may be required on or near equipment where employees are exposed to hazardous energy sources i.e., moving equipment, electrical hazards, compressed gas or liquid systems, stored energy in springs or gravity systems, heat, or radiation. In all such cases the isolation, lockout and tagging of the energy source from the susceptible employees is mandatory.

Identification of high-risk energy sources is generally undertaken during task planning activities including Site Risk Assessments (FOR-TDG-024), or formal risk assessment. The actual isolation of the energy source must be verified and must be maintained by use of locks and tags in strict conformance of customer Isolation Procedures.

A risk assessment shall be completed prior to all testing activities and identified controls implemented to protect against inadvertent contact or equipment malfunction. Persons required to perform isolations shall be competent in isolation and lockout/ tagout procedures together with area specific training.

4.4.1.10 Housekeeping

Housekeeping is an extension of daily work activities for each work location.

The Manager and all employees including subcontractors will be responsible for ensuring an informal inspection is conducted daily and the area within their control is maintained in a tidy and safe condition.

Materials and equipment no longer in use should be stored in its designated location.

3.4.1.9 Working Alone

Working alone is not permitted where TDG employees are working on or near electrical installations where there is a foreseeable risk of electrocution.

If the need for lone working arises then it must be subject to a risk assessment to ensure that adequate controls are implemented, for example: -

- Only low risk activities should be completed such as monitoring or administration duties.
- No operation of high-risk plant or equipment, no work at heights, no confined space entry and no work involving excavation.
- The lone worker must be competent and understand the limits of their work activities.
- Provision of a suitable means of communication must be available so a supervisor can be alerted at any time.
- A pre-determined calling in system must be provided so the lone worker can check in at certain times and, if not, steps can be taken to investigate.
- A proactive call plan should be implemented to contact the lone worker to check on their welfare throughout the shift.

Adequate communication systems shall be established when TDG personnel are called to work after hours.

Suitable arrangements must be in place to provide immediate and on-call emergency support and/ or first aid.

4.4.1.11 Loading and Unloading material

Drivers of loading/ unloading services vehicles such as tippers, combination vacuum jetting trucks and grabs trucks must be fully licensed, competent with the operation of the vehicle and its plant and trained in Chain or Responsibility (COR).

Drivers are responsible for the below: -

- The vehicle is correctly loaded and not overloaded, (weight distribution, no cross-contamination of hazardous materials, correct tanker vessel for the load (fibreglass, steel, flammable, etc.)
- The vehicle and driver comply with all site requirements (flashing amber light, dress code, driver PPE, etc.)
- Regulator approved and/ or designated routes are adhered to for all trips to and from customer sites including the completion of all required documentation under Law.
- Approved internal and external site entry, exit and movement rules and procedures are followed as well as appropriate directions given by site personnel in relation to loading/ unloading activities.
- Drivers must not participate in the loading or unloading of loads whether internally or externally unless they are fully inducted and deemed competent to do so by the site/ facility.

4.4.1.12 Traffic Control Management

Where required Traffic Control Management will be established in accordance with state regulations to complete work safely. The qualified traffic controllers will provide protection to our people, our customers, and members of the public such as motorists and pedestrians through the management of lane closures and detours, the set-up of work zones, road construction work management and traffic event management. All traffic controllers will be certified by the regulator.

3.4.1.13 Notices and Signs

Safety signs promote a safe work environment, keeping employees aware of potential hazards and reinforcing important safety precautions and policies. Adequate safety, chemical, social distancing, and general hygiene signage will be displayed at entrances to work areas and throughout facilities to highlight the safety requirements in each work area. Relevant WHS notices and signs shall be prominently displayed to ensure personnel in the vicinity are made aware of any potential hazards.

4.4.1.14 Personal Protective Equipment

Managers, workers, and others must identify and assess potential risks that may arise at workplaces or while undertaking work activities. Once Work Health Safety (WHS) risks are identified, then appropriate methods must be taken to eliminate risk exposure or minimise the risks. Personal Protective Equipment (PPE) is required to protect against exposure to hazards identified in a WHS Risk Assessment. All employees will be provided with the minimum requirements for PPE as specified by legislation including:

- long trousers and long-sleeved collared shirt (hi-visibility)
- safety glasses
- hard hat
- hardened toe cap safety footwear (lace-up, no elastic sided boots allowed)
- gloves and glove clips
- Any specialised PPE required (e.g., face shield, hearing protection).

Information on the use, care and maintenance of PPE will be given to employees during the onboarding process/ site induction.

Additional PPE requirements shall be identified through regular WHS Risk Assessment review.

Areas where personal protective equipment is required to be worn must be adhered to and shall be prominently sign posted. All PPE provided to employees will be signed for on a Uniform & PPE Register (FOR-TDC-265).

4.4.1.15 Working at Heights

Prior to any working at height being undertaken, working at height training will be conducted by an accredited external provider that meets the National Training Accreditation Standard (certification is valid for a maximum period of 12 months from the date of issue).

Working at height is defined as an area where a person can fall from one level to another, both above and below ground level. Fall protection is required at any time, when:

- There is a risk that personnel may fall and injure themselves
- Working from any elevated work platform or man cage
- Undertaking a task closer than 2.0m to an open edge

Fall protection may include, but is not limited to:

- Scaffolding
- Substantial handrail
- Personal fall restraint equipment, e.g., a harness

Work at height that requires the use of a fall arrest system will require a SWMS, a rescue plan and prior approval by the means of a permit. Working at Height Permit (FOR-TDC-252) will be issued by the Project Manager before the work is undertaken.

4.4.1.16 Work Permits

Work Permits are used to ensure that all designated high-risk work on site is carried out under Controlled Conditions. Activities that require a Work Permit include:

- Confined space work
- Excavations
- Hot work outside designated areas, and
- Working at height

A permit is issued by one party and accepted by another. No one can issue a permit to themselves. TDG subcontractors and employees will utilise and comply with our customers permit to work systems unless the permit contravenes TDG policies, procedures, or safe work systems.

4.4.1.17 Hazardous Material

Hazardous chemicals are substances that can cause adverse health effects such as poisoning, breathing problems, skin rashes, allergic reactions, allergic sensitisation, cancer, and other health problems from exposure. Many hazardous chemicals are also classified as dangerous goods.

A current Safety Data Sheet (SDS) must accompany all hazardous materials delivered to site. An SDS contains more detailed information about health and safety aspects of hazardous substances than the label does. It describes:

- Properties and uses of the substance.
- Health and environmental hazard information.
- Precautions for use.
- Safe handling requirements.

Hazardous chemicals must be stored in the original containers with the label intact. All hazardous chemicals MUST be recorded in the Hazardous Chemicals Register (REG-TDC-515). Employees, contractors, and subcontractors must be briefed in the correct use of any hazardous chemical, so they have an awareness of all potential health and environmental hazards.

4.4.1.18 Health Surveillance and Monitoring

The requirement for health monitoring will be determined via the risk assessment process.

Pre-Employment Medicals:

All operators will undergo a pre-employment medical to determine their health status and suitability for the task. Tasks may include working in confined spaces including in and around sewer assets which may present potential health risks. An operators' serology for Hepatitis A and B must be reviewed if they will be working in and around sewer assets to ensure their immune system will provide a positive response to pathogens or introduced substances they may come into contact with as a result of their working environment.

Audiometric Testing:

Audiometric testing is required for workers who are frequently required to use personal protective equipment for protection against the risk of hearing loss associated with noise that exceeds the exposure standard for noise.

Audiometric testing must be provided for the worker during the pre-employment medical or within 3 months of the worker commencing the work, then at least every 2 years. Workers audiometric test results shall be kept in the employee's file.

Health Monitoring:

Health monitoring shall be undertaken if workers are required to carry out work involving hazardous materials including: -

- volatile substances such as MOCA Asbestos, Crystalline Silica, Vinyl Chloride, organophosphate, pesticides, lead, isocyanates etc.
- Extreme environmental conditions such as high humidity and high temperature and working in sewer stormwater systems.
- Any high-risk materials such as asbestos.

The SQE Manager shall give information about the health monitoring requirements to: -

- A person who is likely to be engaged to carry out work using, handling, generating, or storing a hazardous chemical, and
- A worker for the business or undertaking, before the worker commences work using, handling, generating, or storing a hazardous chemical (during company induction).

Health monitoring must be supervised by registered medical practitioner with experience in health monitoring.
The SQE Manager or nominee must provide the following information to the registered medical practitioner carrying out or supervising the health monitoring: -

- The name and address of the person conducting the business or undertaking,
- The name and date of birth of the worker,
- The work that the worker is, or will be, carrying out that has triggered the requirement for health monitoring,
- If the worker has started that work—how long the worker has been carrying out that work.

The SQE Manager must take all reasonable steps to obtain a health monitoring report from the registered medical practitioner who carried out or supervised the monitoring as soon as practicable after the monitoring is carried out in relation to a worker.

The SQE Manager must give a copy of the health monitoring report to the worker as soon as practicable after the person receiving the report.

A copy of the health monitoring report must be provided to SafeWork NSW as soon as practicable after obtaining the report if: -

- Test results indicate the worker may have contracted a disease, injury, or illness because of carrying out the work using, handling, generating, or storing hazardous chemicals that triggered the requirement for health monitoring, or
- Any recommendation that the person conducting the business or undertaking take remedial measures, including whether the worker can continue to carry out the work using, handling, generating, or storing hazardous chemicals that triggered the requirement for health monitoring.

Health monitoring records must be kept as confidential records and kept for at least 30 years after the record is made. Health monitoring reports and results of a worker assessment must not be disclosed to another person without the worker's written consent.

4.4.1.19 Monitoring and Measurement

Identified work environment monitoring and measurement requirements are assessed in accordance with Risk Management procedure (PRO-TDC-112) and relevant legislative requirements.

As a minimum, monitoring and measurements requirements shall be listed in the relevant section of the SWMS. TDG's safety management system refers to "those activities involving observation, testing and monitoring of the work environment in order to detect and assess if there are hazards present, to which workers and others may be exposed which have a potential to cause occupational health problems to those present in the workplace".

In addition, the monitoring process shall take in consideration and include the frequency and prescribed deliverables under regulation once the level of risk exceeds exposure standards.

4.5 Reviews of controls

A review of controls will take place regularly and in the event of any of the following: -

- The current control failed to reduce the risk adequately.
- When changes to the workplace occur that create new or different risks.
- When new hazards are identified.
- If consultation with relevant persons indicate that a review of the control is needed.
- The WHS team requests a review in-line with the requirements of the Work Health and Safety Regulation 2017 (WHS Regulation).
- A major risk is identified (risks with a residual risk rating of High and above)

The process of hazard identification, risk assessment and control is a collaborative, proactive and ongoing process and will be conducted in consultation with relevant internal and external stakeholders for each project whether permanent or temporary.

5. Section 4 Change Management

Change management is a collective term for all approaches to prepare, support, and help individuals, teams, and organizations in making organizational change. Change can relate to systems, processes, legal and other requirements, equipment, personnel, raw materials, new contracts, expiring contracts and products.

At branch level, we empower our teams to collaborate with each other across all levels of management in the interest of continuous improvement, shared learnings, and growth.

The TDG Executive Management Team are committed to a consistent approach to change management throughout the company’s operations, ensuring any significant changes required are clearly and effectively communicated with strong consideration to all potential areas of risk including safety, environmental, compliance, financial, operational, or strategic.

6. Section 5 Operational Planning & Control

Operational planning and controls need to be established and implemented to enhance occupational health and safety, eliminate hazards, or at least reduce the WHS risks to levels as low as possible for operational areas and activities.

When planning and developing operational controls, priority is given to control options with higher reliability in preventing work-related injury and ill health. The WHS Management System processes and activities are established to ensure that operational controls are implemented effectively, and actions taken to mitigate issues.

Operational planning and controls can use a variety of different methods, for example:

- Proactive projects with actions to identify hazards and address risks and opportunities
- Managing resources with maintenance and inspection programs
- Ensuring the competency and awareness of workers with relevant training programs
- Use engineering controls such as physical barriers, warning/safety signs, alarms, and signals
- Use of adequate PPE to minimise the risk and ensure equipment is suitable to the nature of the work or hazard
- The introduction of documented information with procedures, instructions, and record keeping forms

7. Section 6 People Management

TDG are passionate about our people and committed to helping every employee realise their potential.

We pride ourselves on the retention of our employees and invite motivated people from all walks of life to apply for a range of new job opportunities with TDG that periodically become available. We provide a supportive work environment, flexible working conditions, and an extensive training program. As an equal opportunity employer, we ensure all personnel policies and practices are free of discrimination and harassment for all workers.

One of our main competitive advantages resides in our people. We maintain relationships based on mutual trust and respect, something we consider foundational to our company and fundamental to achieve high performance and superior results.

6.1 Induction and Training

TDG realises the importance of the induction process to assist new workplace participants to settle into the workplace and to inform new employees about TDG's training opportunities, policies, and procedures.

The induction process involves new employees completing an online onboarding checklist to ensure they can be established on TDG's database. This should occur on the first day of employment and includes:

- Welcome Presentation and Introduction to TDG
- Employment Forms and Contract
- TDG Policies and Procedures
- Site Specific Documentation
- Site Specific Inductions
- Chain of Responsibility Summary
- Communication and Consultation
- Hazard and Near Miss Reporting
- Drug & Alcohol Procedures
- Injury Management
- Incident Management and reporting
- First Aid Requirements
- Fatigue Management
- Site Safety Rules

TDG acknowledges that learning and development is fundamental to the improvement of operational performance and achievement of business strategies and goals.

TDG will regularly scan the business and conduct a training needs analysis of teams and functions to ensure currency of skills and competencies required to remain competitive and agile within our changing industry.

Where specific qualifications, certifications or licencing is required TDG will ensure employees are appropriately trained to undertake these tasks and duties.

All training records will be managed in accordance with Induction, Learning and Development Procedure (PRO-TDG-020) and Document Information Procedure (PRO-TDC-116).

8. Section 7 Incident Management

The timely and accurate reporting and investigation of all incidents is one of the many ways that unsafe acts and conditions in the workplace can be identified. Once identified, an appropriate control strategy can be implemented to prevent a recurrence.

TDG has a robust system based on the level and type of the incident, the severity of the incident and clearly defined timelines for resolution. All WHS incidents are reported, documented, and investigated in accordance with the severity of the incident and associated legislative requirements.

Incidents include (but are not limited to):

- Work-related injury.
- Work-related fatality.
- Work-related illness or disease.
- Near miss (where a fatality, injury or illness could have occurred).
- Damage to property.
- Vehicle and/ or plant incidents and/ or accidents.

All incidents, accidents or hazards must be reported immediately to the Site Works Supervisor (where applicable/ available) and then to the Works Supervisor and Project Manager as soon as practically possible to initiate the reporting, investigation, and corrective action process.

All incidents, accidents or hazards shall be reported, recorded, and managed in accordance with the Accident and Incident Reporting Procedure (PRO-TDG-004) and recorded using the Incident Report Form (FOR-TDG-020).

7.1 Communication of Incidents

TDG will report all project related WHS incidents to our customers, within the following timeframes unless instructed otherwise.

Type of Incident	Verbal Notification	Written Notification	Investigation Report
Near miss	Within 24 hours	Within 2 working days	Within 10 working days
Property / equipment damage	Within 24 hours	Within 2 working days	Within 10 working days
First aid case	Within 24 hours	Within 2 working days	Within 10 working days
Medical treatment injury	Within 12 hours	Within 2 workings days	Within 5 working days
Lost time injury	Within 12 hours	Within 1 working day	Within 5 working days
Notifiable incident to regulator	Immediately	Within 1 working day	Within 3 working days (initial report)

Relevant details of incidents, dependent upon severity or potential severity of the incident shall be notified to affected workers and other applicable TDG staff as required. Where wider distribution of incident details is required, a Safety Alert may be issued.

7.2 Notifiable Incidents

Where a fatality or notifiable incident occurs, the accident scene is to be preserved until such time as permission is granted by a SafeWork Inspector, except if necessary, to save a life, relieve suffering or to prevent further property damage.

A notifiable incident as described in WHS legislation includes the death of a person, serious injury, or dangerous incident. In the event of a notifiable incident, the State Regulator will be notified by the fastest possible means and in the order of a telephone call, then email, then fax (if available).

A TDG SQE Manager will notify the relevant authorities to seek advice about whether the site must be preserved and whether written notification is to be supplied. All instructions provided by the Authority will be followed. Any notifiable incidents will be reported to our customer by a TDG Project Manager or SQE Manager within our standard timeframes as listed above, or as agreed with the customer.

The definitions of Serious Injury and Dangerous Incidents are described below:

State	Notifiable Incident
NSW Work Health and Safety Act 2011 Work Health and Safety Regulations	▪ The death of a person ▪ A serious injury or illness ▪ A dangerous incident Any other incident that involves a risk of: ▪ A serious injury or illness is an injury or illness requiring a person to have: ▪ Immediate treatment as an in-patient in a hospital; or ▪ Immediate treatment for: ▪ The amputation of any body part ▪ A serious head, eye or burn injury ▪ The separation of the skin from an underlying tissue (such as de-gloving or scalping) ▪ A spinal injury ▪ The loss of a bodily function ▪ Serious lacerations ▪ Medical treatment within 48 hours of exposure to a substance: or ▪ If health monitoring tests find a worker may have contracted a disease, injury, or illness from a hazardous chemical, lead or asbestos for which monitoring is required; or ▪ If a health monitoring report recommends remedial action regarding a hazardous chemical, lead or asbestos. A dangerous incident is an incident that exposes a person to a serious risk to their health or safety arising from an immediate or imminent exposure to: ▪ An uncontrolled spillage or leakage of a substance ▪ Implosion, explosion, or fire ▪ Escape of gas, steam, or a pressurised substance ▪ Electric shock ▪ The fall or release from a height of any plant, substance, or thing ▪ The collapse, overturning, failure, or malfunction of, or damage to, any plant that is required to be authorised for use in accordance with the regulations ▪ The collapse or partial collapse of a structure; excavation or of any shoring supporting an excavation. ▪ The inrush of water, mud, or gas in workings, in an underground excavation or tunnel; or other event prescribed by the regulations. ▪ any infection to which the carrying out of work is a significant contributing factor, including any infection that is reliably attributable to carrying out work with micro-organisms. (ii) that involves providing treatment or care to a person; or (iii) that involves contact with human blood or body

	substances; or (iv) that involves handling or contact with animals, animal hides, skins, wool or hair, animal carcasses or animal waste products The following occupational illnesses contracted in the course of work involving handling or contact with animals, animal hides, skins, wool or hair, animal carcasses or animal waste products. (i) Q fever (j) Anthrax (k) Leptospirosis (l) Brucellosis (m) Hendra Virus (n) Avian Influenza (o) (vii) Psittacosis

7.3 Return to Work

TDG is committed to the rehabilitation and return to work of injured workers. TDG ensures that injured workers (and anyone representing them) are aware of their rights and responsibilities – including the right to choose their own doctor and rehabilitation provider, and the responsibility to provide accurate information about the injury and its cause.

TDG actively participates in the development of injury management plans to ensure the injury management process commences as soon as possible after a worker is injured. A suitable person (Return to Work Coordinator) will be arranged to manage the return-to-work plan. The injured worker will be provided with suitable duties that are consistent with medical advice, are meaningful and productive and appropriate to the injured worker's physical and psychological condition.

Depending on the individual circumstances of the injured worker, suitable duties may be at the same workplace or a different workplace, the same job with different hours or modified duties, a different job and may involve full-time or part-time hours.

References:

- PRO-TDC-118 Injury Management Procedure
- POL-TDG-014 Return to Work Policy

7.4 Workplace Health and Safety Entry Permits

TDG recognises the role of Workplace Health and Safety Entry Permit Holders under The Fair Work Act 2009 (the FW Act) and the Work Health and Safety Act 2011 (Cth) (the WHS Act).

TDG will make all reasonable efforts to cooperate, and not hinder a Workplace Health and Safety Entry Permit Holder during the time they perform the duties within their powers at the worksite, and allow Workplace Health and Safety Entry Permit Holders to enter or inspect a worksite under the following conditions:

- They haves a valid entry permit stating suspected contravention
- The workers are a member or eligible to be a member of the union represented by the Workplace Health and Safety Entry Permit holder or who's interests are represented by the union
- Workplace Health and Safety Entry Permit holder to act only with the scope and limitations set out in the Workplace Health and Safety Act.

7.4.1 What is right of entry?

The *Fair Work Act 2009* (the FW Act) and the *Work Health and Safety Act 2011* (Cth) (the WHS Act) enable union officials to enter workplaces for specified purposes. To exercise this right of entry the union official must:

- hold a valid and current entry permit, and
- be entitled to represent workers at the workplace.

7.4.2 Right of entry under the Fair Work Act 2009

A union official (including an employee of a union) has the right to enter premises if they hold a valid and current entry permit issued by the Fair Work Commission under s.512 of the FW Act (a Fair Work entry permit).

The Fair Work entry permit allows the official to enter premises for the purpose of:

- investigating suspected breaches of the FW Act and other instruments
- investigating breaches relating to textile, clothing, and footwear industry outworkers
- meeting with employees, and
- exercising rights under occupational health and safety laws.

7.4.3 Right of entry under the Work Health and Safety Act 2011 (Cth)

A union official (including an employee of a union) has the right to enter premises for the purpose of exercising rights under the *Work Health and Safety Act 2011* (Cth) if they hold:

- a valid and current entry permit issued by the Commission (a Fair Work entry permit), and
- a valid and current Work Health & Safety permit issued by the Commission (a WHS entry permit).

The WHS entry permit allows the official to enter premises for the purpose of:

- inquiring into suspected contraventions of the WHS Act
- inspecting documents directly relevant to a suspected contravention, and
- consulting and advising workers.

7.5 WHS Issue Resolution

Wherever possible, any WHS concerns will be resolved through consultation between workers, their representatives and/ or their manager. If the concern cannot be resolved, then it can be referred to the Grievance Officer for resolution. Ultimately any issue remaining unresolved may be referred to the Managing Director.
Where the issue remains unresolved the default procedure for issue resolution set out in the WHS Regulations must be followed. If reasonable efforts have been made to resolve an issue and it remains unresolved, any party to an issue can request WorkCover appoint an inspector to aid the resolution.

7.6 Corrective Actions

Investigation reports contain a corrective action section which details the actions required, by whom and when. It may include requirements for system improvements pending investigation results as required. Corrective actions will be managed in accordance with TDG Control of Non-Conforming Product, Corrective and Preventive Action procedure (PRO-TDC-102).

Responsible persons will have time to address corrective actions detailed in investigation reports. Items not corrected within the appointed time will be subject to an escalation process so additional support can be introduced to expedite the implementation of the corrective actions.

7.7 Performance Management and Disciplinary Action

Non-compliance of Total Drain Cleaning WHS requirements will result in disciplinary action. In the event of disciplinary action being taken as outlined below: -

- First infringement - verbal warning given by TDG Manager.
- Second infringement - written warning issued by TDG Manager; and
- Third infringement – removal/ termination from the Project by the TDG Manager.

Disciplinary action may vary and is at the discretion of the TDG manager or supervisor, depending on the severity of the non-compliance.

Incidents involving but not limited to the following issues shall warrant escalation: -

- Tampering, misusing or damaging plant, equipment, and safety equipment.
- Any breach where a blatant disregard of safety requirements is demonstrated.
- Sexual harassment.
- Unacceptable behaviour.
- Non-compliance of TDG Fitness for Work requirements.

9. Section 8 Emergency Management

Preparation for emergency situations aims to minimise the nature and extent of injuries, damage to property and harm to the environment that may arise due to a fire, explosion, chemical spill, medical emergency, natural disaster, bomb threat or violence.

TDG maintains a system for the identification of potential emergency situations that can impact health and safety and supports our objectives to be prepared to respond to actual incidents.

The Emergency Preparedness & Response Plan (PRO-TDC-103) provides guidance to Workers on the correct course of action in an emergency.

10. Section 9 Inspections, Testing and Servicing

TDG is committed to ensuring all personnel are compliant to the requirements outlined in this Work Health & Safety Management Plan, associated documentation and State legislative requirements. To achieves this, TDG conducts internal audits, field audits, inspection and testing which verify that correct processes are employed, and that plant, tools, equipment, and PPE remains suitable for the task in accordance with Monitoring and Measurement Procedure (PRO-TDC-107).

All audits, inspection and testing shall be documented, retained, and conducted in accordance with Internal Audit Procedure (PRO-TDC-105), Measurement and Measurement Procedure (PRO-TDC-107).

9.1 Plant and Equipment

All plant and equipment used on site shall as a minimum, conform to the manufacturer's specification. TDG shall comply with statutory requirements for machinery guarding, noise abatement and warning devices.

A dedicated file is created at the time of purchase for each new vehicle, plant or equipment that requires ongoing inspection and service or has the potential to suffer a breakdown. The performance, service history and any associated risk assessment for each vehicle, plant or equipment is stored on the dedicated file.

9.2 Plant, Equipment and Vehicles

All plant, equipment and vehicles will be operated in line with the manufacturers intended operating design. TDG shall ensure that all light vehicles, trucks, and special equipment are fitted with the following additional safety devices as a minimum.

- An audible reversing alarm with isolating switch for use on site
- Suitable First Aid kit
- Orange rotation beacon/flashing light
- Headlights on function
- Wheel chocks
- Fire extinguisher – min 1kg
- Clearly marked shut off switch with isolation point and procedure for isolation kept in cab.
- Vehicle to be generally in good condition and appearance; and
- Warning Triangles.
- Heavy Vehicles shall also have:
- Risk Assessment
- Flashing amber lights
- Appropriate registration; and
- Documented daily inspection.

All road-going vehicles, plant and equipment will be operated in accordance with the Australian state or federal road rules.

9.3 Vehicle Inspection and maintenance

Employees and Contractors shall ensure that items of plant designated to their work areas are inspected prior to their operation each morning or change of shift. This inspection is also extended to any hire equipment. The operator or person delegated to complete the inspection shall enter details of the inspection into the Daily Vehicle Inspection Checklist (FOR-TDC-238).

9.4 Defect Reporting

Unsafe plant, equipment and vehicles shall be withdrawn immediately from service, and/ or completed isolated by a competent person. A warning label will be affixed to warn against further use. Arrangements will be made, as soon as possible, for such equipment to be disposed, destroyed, or repaired by an authorised repair agent or competent person.

11. Section 10 WHS Purchasing

Prior to purchasing any goods or services for the workplace, they should be assessed to determine if there are any associated health and safety hazards. This includes the purchase of equipment such as machinery, tools, furniture, chemicals, as well as contracted periodic services such as servicing of vehicles, plant and equipment or facility management services such as pest control, cleaning services, etc.

12. Section 11 Communication, Participation and Consultation

TDG promotes a culture based on openness, honesty, and mutual respect. Maintaining effective, transparent, and open relationship as well as consultation with all stakeholders is critical to TDG's ongoing business success. Effective two-way communication within TDG allows employees to contribute to innovation and continual improvements to the business plans, performance, and systems.

11.1 Communication

TDG will ensure our workers are aware of WHS requirements by providing them with this Work Health & Safety Management Plan before starting work on the project. WHS information will be communicated via: -

- Company Induction
- Project Specific Inductions
- Safety Management Plan
- Emergency Response Procedures
- Site Safety Rules
- Safe Work Method Statements
- Regular Toolbox Talks
- Incident Reports
- Safety Alerts

11.2 Communication at Worksites

The Works Supervisor is the contact point for all quality, safety, environment and traffic management issues and emergencies on site.

Interactive Toolbox Talks are conducted to discuss project progress and actual outputs against targets; and to discuss other issues such as incidents, accidents, near misses, non-conformances, corrective actions, and improvements.

All attendees are required to complete and sign our Toolbox Talks Form (FOR-TDG-065) to evidence their attendance. All attendees are encouraged put forward any additional hazards for consideration and review. Work team members are required to notify the Works Supervisor of any quality, safety, and environmental issues on site.

11.3 Communication with Subcontractors

Contact names and phone numbers for subcontractors are available in Beakon. The Works Supervisor and Project Manager are the contacts for subcontractor matters. Only approved subcontractors will be used. All subcontractors are subject to a subcontractor approval process to determine whether the subcontractor meets our Work Health & Safety Management standards.

11.3 Participation

All TDG employees have the ability to participate within company communications via:

- Toolbox talks
- Training sessions
- Emails
- Verbal communication
- Text
- Suggestion form
- Noticeboards

11.4 Consultation

WHS information will be communicated to employees, customers, the community (by approved delegates only) either immediately, periodically, throughout essential planning stages, or during times of change as detailed below: -

- At toolbox meetings where anyone can raise issues for discussion
- Informally, during the planning of activities or the development of safe work documentation.
- When changes to the workplace could affect the health and safety of a worker.
- During an incident investigation process.

11.5 Community Liaison

All relevant authorities, businesses or members of the community affected by project works will be informed about the project activities and timeframes. In the event of interference with access to property the affected members of the public will be advised either in person (verbally), with written

advice or via a media announcement. Enquiries about the works from external parties are recorded on the Communications and Complaints Register (REG-TDC-503c).

13. Section 12 Legal Compliance and Other Requirements

Compliance to applicable regulatory requirements shall be achieved through: -

- The employment and/ or engagement of subject matter experts and industry professionals.
- Regular communication and consultation with the regulators, local and federal government.
- Effective internal communication systems for compliance, legal and other requirements.
- Recurrent internal and external auditing and review of the businesses systems.

12.1 Legislation

The TDG Integrated Management System has been developed in accordance with the following key legislation and codes of practice.

Standards

- ISO 45001:2018 - Occupational Health and Safety Management Systems
- ISO 31000:2009 - Risk Management
- ISO 9001:2015 – Quality Management

Commonwealth Legislation

- Work Health and Safety Act 2011
- Work Health and Safety Regulations 2011
- Heavy Vehicle National Law

NSW Legislation and Codes of Practice

- Work Health and Safety Act 2011
- Work Health and Safety Regulation 2017
- Heavy Vehicle (General) National Regulation
- Heavy Vehicle (Fatigue Management) National Regulation
- Heavy Vehicle (Mass, Dimension and Loading) National Regulation
- Heavy Vehicle (Vehicle Standards) National Regulation
- Dangerous Goods (Road and Rail Transport) Act 2008
- Environmentally Hazardous Chemical Act 1985
- Transportation Administration Act 1988
- Workplace Injury Management and Workers Compensation Act 1998t
- Local Government Act 1993
- Roads Act 1993
- Traffic Control Act 1909
- COP Confined Space 2019
- COP Hazardous Manual Task 2019
- COP How to manage WHS Risk 2019
- COP Managing risk of falls at workplaces 2019
- COP Managing the Work Environment and Facilities 2019
- COP - Induction for construction work

Vic Legislation and Codes of Practice

- Work Health & Safety Act 2011
- Work Health & Safety Regulations 2017 (WHS Regulations)
- Heavy Vehicle (General) National Regulation
- Heavy Vehicle (Fatigue Management) National Regulation
- Heavy Vehicle (Mass, Dimension and Loading) National Regulation
- Heavy Vehicle (Vehicle Standards) National Regulation
- Workplace Injury Rehabilitations and Compensation Act 2013
- Dangerous Goods Act 1985
- Equipment (Public Safety) Act 1994
- Environment Protections Act 2017
- Roads Safety Act 1986
- Transport Act 1983
- COP Confined Space 2019
- COP Hazardous Manual Tasks 2019
- COP Manage WHS Risks 2019
- COP Managing risk of Plant in the workplace 2019
- COP Managing risk of falls 2019
- COP Managing the work environment & facilities 2019

Qld Legislation and Codes of Practice

- Work, Health, and Safety Act 2011
- The Occupational Health and Safety Regulations 2011 (OHS Regulations)
- Heavy Vehicle (General) National Regulation
- Heavy Vehicle (Fatigue Management) National Regulation
- Heavy Vehicle (Mass, Dimension and Loading) National Regulation
- Heavy Vehicle (Vehicle Standards) National Regulation
- COP Confined Space 2021
- COP Hazardous Manual Tasks 2021
- COP Manage WHS Risks 2021
- COP Managing risks of Plant in the workplace 2021
- COP Managing risk of falls 2021
- COP Managing the work environment & facilities 2021

The applicable Standards and Codes of practices are used as guidance material. In the initial induction process, employees and contractors are advised of their legal obligations regarding WHS and the obligations of TDG as an employer. Any changes to the legislation shall be communicated in accordance with TDG's Consultation, Participation & Communication procedure (PRO-TDC-101).

14. Section 13 Contractor Management

13.1 Selecting and engaging subcontractors

TDG will only engage suppliers and subcontractors who have the right competencies and experience to perform the work satisfactorily and who we have personally benchmarked over years of experience. Subcontractors will be selected as follows: -

- The subcontractor is already an approved supplier on the TDG preferred suppliers list.
- The subcontractor has been awarded the work after a thorough tender, EOI or proactive proposal review process.
- The subcontractor meets the requirements of the size, scope or sensitivity of the work required.
- The subcontractor meets the requirements of TDG internal procurement purchasing procedures.

13.2 Managing Subcontractors (on site)

Under the new *Work Health and Safety (WHS) Act* contractors and subcontractors are now considered "workers." TDG has the same duties to "workers" as defined in the *Work Health and Safety (WHS) Act* as we do to our company employees. However, contractors may also be a 'person conducting a business or undertaking' (PCBU) if they engage their own workers.
TDG applies a level and type of control to contractors appropriate to the risks associated with the contracted works. For example, we may provide supervision for a worker when a worker may be at risk of interaction with other site personnel, other works, equipment, plant, or vehicles. TDG's involvement with the contractor will be determined during a risk assessment, prior to the commencement of any work. All contract personnel are registered in a Contractors Register.

TDG provides site induction to subcontractors on site by:

- Informing the subcontractors of their responsibilities.
- Identifying those TDG staff (Project Manager and Works Supervisor) who have authority to direct subcontractors to stop work if their activities breach health and safety requirements.
- Providing instruction on any systems or documentation that the subcontractor is expected to work under or use.

All contractors or subcontractors are monitored for compliance with safety requirements by dedicated WHS professionals, site management and senior leaders within the business. At branch level, all employees are empowered to speak up and intervene if they see something that in their opinion, is unsafe.

15. Section 14 Internal Review

14.1 Management Review

Management reviews are scheduled to assess the systems continuing suitability, adequacy, and effectiveness in accordance with the Management Review Procedure (PRO-TDC-108).

Outcomes of the Management Review include any decisions and actions related to:

- Possible changes in policies, objectives, targets, and other areas of the IMS consistent with the commitment to continual improvement.
- Improvement of the effectiveness of the management system and its processes.

- Improvement of products or services related to customer or contractual obligations.
- Resource requirements.

Some examples of various forums that demonstrate the management review process are listed below.

- Process Meetings
- Contract Meetings
- Toolbox Meetings
- WHS Meetings
- Environmental Management Meetings

These are conducted individually or combined i.e., as part of a contract or operational management meeting.

A yearly review is completed to review the whole business however monthly meetings are conducted to review contract/ site specific KPI's including WHS, Environment, Financial, Operational and Business Systems KPI's.

16. Section 15 Auditing

15.1 Internal Audits

Audits are conducted to support continuous improvement by ensuring that our Integrated Management System is regularly assessed in a consistent and systematic manner and in accordance with Internal Audits Procedure (PRO-TDC-105).

Internal and independent external audits are conducted. Audit Schedule (FOR-TDG-050) is maintained by the SQE Manager detailing the time of the audits.
Auditing shall verify: -

- The effectiveness of the system to meet business requirements.
- Whether the actions carried out conform to the stated intention of the management system.
- The adequacy of any current high-risk controls.
- Compliance with the company policies, legislation, and industry standards.
- Compliance with contractual and customer requirements.
- whether the stated objectives in the policy documents are being met.
- The performance of all aspects of TDG activities.
- Any areas for continuous improvement.

15.2 External Audits

The following external audits will be undertaken: -

- Certification/ surveillance audits to ISO 9001, ISO 45001, and ISO 14001 standards.
- Customer audits to verify safety, environment and quality management systems are in place.

15.3 Audit Findings

Audit findings are reported to Senior Management for inclusion into the management review process. Audit reports are maintained in accordance with Internal Audits Procedure (PRO-TDC-105).

17. Section 16 Records Management

The Work Health Safety Management Plan shall be kept until the project is completed. In the event of a notifiable incident, the relevant plan (initial and reviewed versions) will be kept on file for a minimum of 2 years after the incident. The information it will be accessible to approved delegates and any government appointed officers as required within the minimum period.

18. Section 17 Abbreviations

TDG	TDG Environmental
WHS	Work Health and Safety
WHSMP	Work Health Safety Management Plan
SWMS	Safe Work Method Statement
ITP	Inspection and Test Plan
HVNL	Heavy Vehicle National Law

19. Section 18 Definitions

Terminology	Definition
Person Conducting a Business or Undertaking (PCBU)	A PCBU has the primary duty of care to ensure, so far as is reasonably practicable: the health and safety of its workers while they are at work, and that the health and safety of other persons is not put at risk from work carried out as part of the conduct of the PCBU. TDG is a PCBU.
Officer	It is an officer's duty to exercise due diligence to ensure that the PCBU complies with its health and safety obligations under the WHS Act. The Members of the Board for TDG will usually be Officers under the WHS Act. The Project Manager may be an Officer under the WHS Act Note: A person is an Officer under the WHS Act only if they "make, or participate in making, decisions that affect the whole, or a substantial part, of the business of the corporation; or who has the capacity to affect significantly the corporation's financial standing". Whether a person is an Officer or not under the WHS Act will depend on the facts of the situation.
Worker	Previously known as 'employee'. The term worker includes employees, contractors and sub-contractors and their employees, labour hire employees, outworkers, apprentices and trainees, work experience students and volunteers.
Health and Safety Representative (HSR)	A worker elected by members of their work group to represent them in health and safety matters.
Other persons	Includes any visitors

20. Section 19 Documents

Number	Type	Name of Document
PRO-TDC-100	Procedure	Accident, Incident and Near Miss Procedure
PRO-TDG-025	Procedure	Consultation, Participation and Communication
PRO-TDC-102	Procedure	Control of Non-Conforming Product, Corrective and Preventive Action
PRO-TDC-103	Procedure	Emergency Preparedness and Response
PRO-TDC-107	Procedure	Monitoring and Measurement Procedure
PRO-TDC-105	Procedure	Internal Audit Procedure
PRO-TDC-132	Procedure	Legislation and other Information Source
PRO-TDG-022	Procedure	Management Review
PRO-TDC-114	Procedure	Manual Handling
PRO-TDG-018	Procedure	Environmental Aspects and Impacts
PRO-TDC-110	Procedure	Planning, customer requirements and process control
PRO-TDC-111	Procedure	Resources
PRO-TDC-112	Procedure	Risk Management
FOR-TDG-065	Form	Toolbox Meeting Record
FOR-TDG-024	Form	Site Risk Assessment
REG-TDC-515	REG	Hazardous Substance Register
REG-TDG-017	REG	Communications and Complaints Register
FOR-TDG-020	Form	Incident Report Form
FOR-TDC-238	Form	Daily Vehicle Inspection Form
FOR-TDC-275	Form	Workplace Inspection Checklist
FOR-TDC-252	Form	Working at Heights Permit
TEM-TDG-009	Template	Safe Work Method Statement
FOR-TDG-037	Template	Group Safety Alert Template