

SUBCONTRACTOR EHS DOCUMENTATION PACK USER GUIDE

PREFACE

This document has been developed to assist subcontractors to meet Monaco Hickey's Environmental Health and Safety (EHS) requirements whilst working on a Monaco Hickey Project.

The document should be able to be used as a template to assist your organisation to meet a number of the key legislative requirements outlined in the Victorian OHS Act 2004 and the Victorian OHS Regulations 2007.

Further, Monaco Hickey acknowledges that with the rollout of the harmonised national OHS Act and Regulations in January 2012, there may be some requirement for minor changes to this document. However, it is anticipated that all of the fundamental information within the document will remain unchanged.

Note: This document is for guidance purposes only. Monaco Hickey does not accept any liability for the use of this document, or any losses incurred as a result of using this document.

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1.0 INTRODUCTION

Monaco Hickey has developed the following Subcontractor EHS Documentation Pack with the intent of providing our subcontractors with a set of standard templates to facilitate commencement on site. Further, this documentation pack is aimed at removing generic and / or irrelevant documents that are typically found in standard Subcontractor EHS Documentation Packs.

Complying with this Subcontractor EHS Documentation Pack will assist subcontractors to meet their legislative requirements under the current Victorian OHS Act and Regulations. However, subcontractors should always seek professional advice to ensure that their company remains compliant.

This document is intended on complimenting a company's existing system and provides basic templates in the absence of a company's own documents. It is not intended to remove or surpass a company's own Safety Management System in totality.

The relevant attachments contained within this document are to be completed and provided to the Site EHS Facilitator or Contract Administrator at least 72 Hours prior to commencement on site.

2.0 DEFINITIONS

The Act means the Victorian Occupational Health and Safety Act 2004

The Regulations means the Victorian Occupational Health and Safety Regulations 2007

SWMS means Safe Work Method Statement, as defined in Section 5.1.9 of the Victorian OHS Regulations 2007

Fines – The dollar value of fines is taken as at the FY10 -11 as per the penalty unit published in the Government Gazette.

3.0 RISK MANAGEMENT

Risk management is one of the most important activities that a business can undertake to ensure that it reduces the likelihood and consequence of harm within all areas of the business operations.

Most people automatically undertake basic risk management principles when going about their everyday life for example:

Question: whilst driving a car, why do most people stop at a red light?

Answer: Ultimately, people make a subconscious decision based on the likelihood and consequence of being injured through being involved in a car accident, or penalties incurred as a result of breaking the law.

For most people, the likelihood and consequence of injury or being fined is high, and therefore, people choose to stop rather than go straight ahead.

In a business application, risk management principles are often applied to areas such as:

- Occupational Health and Safety Management;
 - Environmental Management;
 - Quality Management;
 - Financial Management; and
 - Business Reputation Management.
- } Environmental, Health and Safety

For the purpose of this document, the risk management principles will be applied to Environmental Health and Safety (EHS).

- The basic risk management process involves:
- Identification of potential hazards;
- Assessing the likelihood and consequence of the risk;
- Determining risk controls to be implemented; and
- Assessing implemented controls for effectiveness.

This process is completed through the development of Safe Work Method Statements (SWMS) as required throughout the life of the job.

3.1 CONDUCTING A PRELIMINARY HAZARD IDENTIFICATION BASED ON YOUR SCOPE OF WORKS

- A preliminary hazard identification that is based on your scope of works will assist you with identifying key areas of risk prior to task commencement. The benefits to you as a subcontractor are as follows:
- Reduce the likelihood of injury with the potential to impact on workers compensation premiums;
- It will assist in minimising potential disruption to work through absenteeism caused by injury;
- It highlights areas of increased risk to your workers, and others in the area;
- It ensures that you go through the sequence of works to determine if additional resources are required so that there is limited impact on costs mid project;
- It will ensure that you identify all of the activities that will require the implementation of a SWMS as per the requirements of the Victorian OHS Regulations;
- You are able to minimise the amount of documentation required, by addressing areas that are site specific and relevant to the job being undertaken;
- Once complete, it is a good tool to discuss with people working on the job, to determine if there are any potential issues that may not have been thought through in the planning phase.

HIGH RISK CONSTRUCTION WORK

The Victorian OHS Regulations Part 5 Construction, section 5.1.3 define High Risk Construction work as being work that involves one or more of the following:

- where there is a risk of a person falling more than 2 metres;
- on telecommunications towers;
- demolition;
- the removal or likely disturbance of asbestos;
- structural alterations that require temporary support to prevent collapse;
- a confined space;
- a trench or shaft if the excavated depth is more than 1.5 metres;
- a tunnel;
- the use of explosives;
- on or near pressurised gas distribution mains or piping;
- on or near chemical, fuel or refrigerant lines;
- on or near energised electrical installations or services;
- in an area that may have a contaminated or flammable atmosphere;
- involving tilt-up or precast concrete;
- on or adjacent to roadways or railways used by road or rail traffic;
- at workplaces where there is any movement of powered mobile plant;
- in an area where there are artificial extremes of temperature;
- in, over or adjacent to water or other liquids where there is a risk of drowning;
- diving.

3.2 MONACO HICKEY'S EXPECTATIONS

Prior to commencement on a Monaco Hickey project, it is expected that Hazard Identification based on the contract scope of works is completed.

Two non exhaustive examples are shown below that lists the activities of a painting contractor and a structure contractor.

3.2.1 ABC PAINTING SAMPLE HAZARD IDENTIFICATION BASED ON SCOPE OF WORKS.

Activity	Potential High Risk Activity	SWMS Required Y/N	Name of SWMS
Painting from the ground using a roller	Nil	N	N/A
Painting from a boom lift using a roller	Working at heights greater than 2 metres Working with powered mobile plant	Y	"Painting from Boom Lift" SWMS
Painting ceiling on balconies using a brush	Working at heights greater than 2 metres	Y	"Painting Balcony Ceilings using a Ladder" SWMS.


3.2.2 XYZ STRUCTURES SAMPLE HAZARD IDENTIFICATION BASED ON SCOPE OF WORKS.

Activity	Potential High Risk Activity	SWMS Required Y/N	Name of SWMS
Formwork erection (Table Form)	Working at heights greater than 2 metres Working with powered mobile plant	Y	"Formwork Erection" SWMS "General Lifting" SWMS
Concrete Pumping	Working with powered mobile plant	Y	"Concrete Pumping" SWMS
Finishing concrete / screeding	Nil	N	N/A
Formwork Stripping	Working at heights greater than 2 metres Working with powered mobile plant (Forklift)	Y	"Formwork Stripping" SWMS "Use of Forklift" SWMS
Pre-cast panel erection	Pre-cast panel erection Powered mobile plant (cranes) Powered mobile plant (scissor Lift / boom lift)	Y	"Pre-cast panel erection" SWMS "General Lifting" SWMS
Prop removal	Powered mobile plant (scissor Lift / boom lift)	Y	"Use of Scissor Lifts" SWMS "Use of Boom Lifts" SWMS

While the Vic OHS Regulations only require a SWMS to be completed for high risk activities, Monaco Hickey recommends that SWMS's are developed for activities being completed for the first time, or are unique. For example, using a tool or product for the first time.

<INSERT COMPANY LOGO>

SAFE WORK METHOD STATEMENT

Organisation Details			
Organisation Name:		Contact Name:	
ACN/ABN		Contact Position:	
Address:		Contact Phone No:	
Project Details:			
Project:			
Activity:			
Resources / Trades Involved:			
Equipment Used:			
Maintenance checks:			
Materials Used:			
PPE: (Circle / Highlight all that apply)			
Occupational Health Safety or Environmental Legislation:		Codes or Standards applicable to the works:	

ISSUE DATE: <INSERT ISSUE DATE>

P1/4

4.0 SAFE WORK METHOD STATEMENTS

4.1 DEVELOPMENT OF A SWMS

The Regulations require the development and adherence to a SWMS for all activities that are classified as high risk as noted above.

The development of SWMS's should be linked to the up-front risk assessment. Therefore, Monaco Hickey expects that SWMS's are site specific and are only provided for activities to be undertaken on site. **I.E. we do not want generic SWMS Packs.**

A sample SWMS and a copy of Monaco Hickey's SWMS Template are provided in the document pack for use as required.

THE LEGAL PERSPECTIVE

Part 5.1.9 of the Regulations state that:

"an employer must not perform high risk construction work if there is a risk to the health or safety of any person arising from the work unless –

- (a) a Safe Work Method Statement is prepared for the work before the work commences; and*
- (b) the work is performed in accordance with the statement."*

Further, the Regulations define a SWMS as being a document that -

- (a) identifies work that is high risk construction work; and*
- (b) states the hazards and risks to health or safety of that work; and*
- (c) sufficiently describes measures to control those risks; and*
- (d) describes the manner in which the risk control measures are to be implemented. "*

Failure to comply with the requirements outlined in section 5.1.9 of the Regulations may be seen as a breach against sections 21 and 23 of the Act. If found guilty, a company could be liable to pay fines of up to fines of \$215,010 for a natural person and \$1,075,050 for a body corporate if a SWMS is not completed or followed for a high risk construction activity.

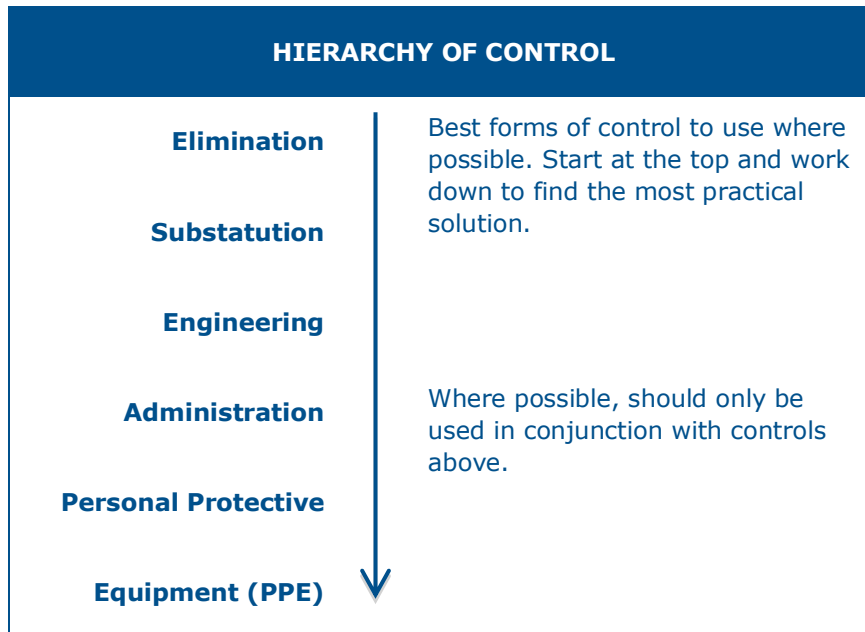
4.2 REVIEW OF SWMS'S

To ensure that legislative requirements are upheld, and Monaco Hickey achieves industry best practice, Monaco Hickey's Management will assess all SWMS's against the following criteria:

- Are hazards & risks associated with the task clearly identified in the SWMS?
- Have site specific considerations been taken into account during the development of the SWMS?
- Are control measures outlined in the SWMS relevant and in keeping with the hierarchy of control?
- Is the SWMS current for the activity being undertaken (ie site specific considerations remain unaltered / not more than 1 year old)?
- Is relevant legislation identified on the SWMS?
- Does the SWMS include record of a toolbox talk or signoff from the workers using the SWMS?

If the SWMS produced does not meet the requirements listed above, the SWMS will be rejected, and works will not be permitted to commence until the issues are rectified.

A copy of Monaco Hickey's SWMS Review sheet is provided in the documentation pack.



5.0 INCIDENT AND INJURY MANAGEMENT

Ensuring that appropriate incident and injury management processes are in place is a critical element in reducing future incidents (learning from past events), remaining legislatively compliant and minimising down time.

Monaco Hickey has the following expectations for the management of any incident or injury.

5.1 INJURIES REQUIRING FIRST AID

If an injury requires first aid, it is critical that you notify a Monaco Hickey First Aid Attendant of the injury. All injuries that receive first aid treatment require a Register of Injuries Form to be completed. The Register of Injuries Form has three primary purposes.

1. The Form protects the individual that was injured, by ensuring that there is a record of the occurrence. This is important, as a number of seemingly minor injuries can lead to future complexities that require a workers compensation claim to be lodged. Without the initial Register of Injuries Form, proving that the condition occurred at work can be difficult, and could potentially lead to the claim being disputed;
2. The Register of Injuries Form assists in determining whether additional investigation into the cause of the injury is required; and
3. Monaco Hickey uses the Register of Injury Forms to determine trends in injury types and causes, and then implements initiatives to reduce the risk of similar injuries occurring.

5.2 MEDICAL TREATMENT INJURIES – MONACO HICKEY’S EXPECTATIONS

In circumstances where a worker is injured and requires medical treatment, Monaco Hickey expects the following to occur:

- A representative of the injured worker is to attend to the medical clinic with the injured worker;
- A letter of introduction is to be taken with the injured worker, and supplied to the medical practitioner for review;
- A list of suitable alternative duties is to be taken into the medical consultation for review by the doctor (where a company does not have their own list of suitable alternative duties, the WorkSafe sponsored CFMEU return to work document should be used.);
- Following the medical consultation, the person who attends the clinic with the injured worker is to contact Monaco Hickey Site Management, and notify them of the outcomes.

Samples of the documents referred to above are provided as attachments.

5.3 MANAGEMENT OF LOST TIME INJURIES – MONACO HICKEY’S EXPECTATIONS

In circumstances where a worker is provided with time off work (by a registered medical practitioner) due to a work related injury (on a Monaco Hickey Project), the following is to occur:

- A Senior Manager that is responsible for the injured worker is to attend site to meet with Monaco Hickey’s Project Manager, in order to complete Monaco Hickey’s Lost Time Injury Review Form.
- Following the meeting with Monaco Hickey’s management, the injured workers management is to ensure that all outcomes agreed to during the LTI review process are adhered to.

5.4 INCIDENTS THAT REQUIRE STATUTORY NOTIFICATION

Victorian Legislation identifies various types of incidents that require notification to WorkSafe Victoria. The purpose of notification is to ensure that incidents that are deemed serious receive a thorough investigation to prevent the possibility of re-occurrence.

Section 37 of the Act identifies the following as being incidents that require statutory notification:

- “the death of a person; or
- a person requiring medical treatment within 48 hours of exposure to a substance; or
- a person requiring immediate treatment as an in-patient in a hospital; or
- a person requiring immediate medical treatment for—
 - i. the amputation of any part of his or her body; or*
 - ii. a serious head injury; or*
 - iii. a serious eye injury; or*
 - iv. the separation of his or her skin from an underlying tissue (such as de-gloving or scalping); or*
 - v. electric shock; or*
 - vi. a spinal injury; or*
 - vii. the loss of a bodily function; or*
 - viii. serious lacerations; or*
- any other injury to a person or other consequence prescribed by the regulations.”

“This Part also applies to an incident that exposes a person in the immediate vicinity to an immediate risk to the person’s health or safety through—

- the collapse, overturning, failure or malfunction of, or damage to, any plant that the regulations prescribe must not be used unless the plant is licensed or registered; or
- the collapse or failure of an excavation or of any shoring supporting an excavation; or
- the collapse or partial collapse of all or part of a building or structure; or
- an implosion, explosion or fire; or
- the escape, spillage or leakage of any substance including dangerous goods (within the meaning of the Dangerous Goods Act 1985); or
- the fall or release from a height of any plant, substance or object; or...”

If an incident falls into any of the categories noted above, Monaco Hickey must be immediately notified, to ensure that WorkSafe and other relevant parties are informed in an appropriate and timely manner

5.4.1 SCENE PRESERVATION

If an incident occurs on site, and falls into any of the categories listed above, the scene of the incident requires preservation (i.e. the area should be taped off to prevent access.)

The legislation relating to scene preservation states:

1. *An employer or self-employed person who is required to notify the Authority of an incident that has occurred at a workplace must ensure that the site where it occurred is not disturbed until—*
 - (a) an inspector arrives at the site; or*
 - (b) such other time as an inspector directs when the Authority is notified of the incident.*

*Penalty: 60 penalty units for a natural person;
300 penalty units for a body corporate.*
2. *Despite sub-section (1), a site may be disturbed for the purpose of—*

- (a) protecting the health or safety of a person; or*
- (b) aiding an injured person involved in an incident; or*
- (c) taking essential action to make the site safe or to prevent a further occurrence of an incident.*

PLAIN ENGLISH INTERPRETATION

If there is an incident that falls into any of the categories listed as being notifiable the scene may only be disturbed if:

- WorkSafe or a WorkSafe Inspector advises that it is ok to disturb the scene; or
- Preservation would cause an immediate risk to health and safety; or
- The scene is disturbed by the removal of an injured person from the incident scene.

5.4.2 DUTY TO NOTIFY

The duty to notify WorkSafe of incidents that fall into the categories listed in 4.2 resides with the Employer that is involved in the incident. The legislation states:

1. An employer or self-employed person must notify the Authority immediately after becoming aware that an incident has occurred at a workplace under the management and control of the employer or self-employed person.
2. However, an employer or self-employed person is not required to notify the Authority if the employer or self-employed person is the only person injured or otherwise harmed, or exposed to risk, as described in section 37 by the incident.
3. Within 48 hours after being required to notify the Authority, the employer or self-employed person must also give the Authority a written record of the incident, in the form approved in writing by the Authority.
4. The employer or self-employed person must keep a copy of the record for at least 5 years and make a copy of the record available for inspection by—
 - (a) an inspector; or*
 - (b) a person, or a representative of a person, injured in the incident or whose health or safety was exposed to immediate risk by the incident; or*
 - (c) a representative of a person whose death was caused by the incident; or*
 - (d) in the case only of an employer—*
 - (i) if any of the employees of the employer are members of a designated work group, a health and safety representative for the designated work group; or*
 - (ii) the members of each health and safety committee (if any) established by the employer.*
5. An employer or self-employed person who contravenes sub-section (1), (3) or (4) is guilty of an offence and liable to a fine not exceeding—
 - (a) in the case of a natural person, 60 penalty units; or*
 - (b) in the case of a body corporate, 300 penalty units.*

PLAIN ENGLISH INTERPRETATION

As soon as an incident falls into the categories listed as being notifiable, WorkSafe is to be notified immediately. The easiest way to do this is via the WorkSafe incident notification hotline.

Within 48 Hours, a copy of WorkSafe's Incident Notification Form is to be completed and sent to WorkSafe.

Failure to notify WorkSafe could lead to fines of up to \$36,000

5.4.3 MONACO HICKEY EXPECTATIONS FOR INCIDENT NOTIFICATION AND SCENE PRESERVATION

If you are working on a Monaco Hickey site, our expectation is that you contact either the Project EHS Facilitator, or the Project Manager as soon as you become aware of the incident.

Monaco Hickey is able to help with the notification process to WorkSafe, and will conduct an internal investigation into the incident to determine root causes, and assist in the prevention of re-occurrence.

5.4.4 NEAR MISS INCIDENTS

Near miss incidents that had the potential to cause serious injury, structural damage, injury to members of the general public, or property damage must be reported to Monaco Hickey's Management immediately.

Monaco Hickey's management will undertake an incident investigation and in certain circumstances, the near miss incident may require notification to WorkSafe as per the notification requirements in S37 of the Act.

6.0 RETURN TO WORK

It is the responsibility of all companies / businesses that have a payroll exceeding \$1,000,000 to ensure that they have an appropriate Return to Work programme in place, as per the requirements of Section 156 of the Accident Compensation Act 1985.

The legislation specifically states that an Occupational Rehabilitation Programme must include:

- a statement of the employer's return to work policy; and
- the name of a return to work co-ordinator nominated by the employer; and
- the name of at least one approved provider of occupational rehabilitation services who will be available to provide services where reasonably necessary for the return to work and maintenance at work of an injured worker; and
- provide for any additional matters specified by the Authority; and
- be developed by the employer in consultation with the workers of the employer; and
- be in writing.

6.1 MONACO HICKEY'S EXPECTATIONS:

If a subcontractor employees more than 10 people (including office staff and wages employees), it is expected that the company will provide Monaco Hickey with:

- A copy of the company's Return to Work Policy; and
- A list of suitable alternative duties that could be performed by an injured employee (note: use of the WorkSafe Victoria sponsored CFMEU Return to Work document is acceptable)

The following must be supplied for all subcontractors (regardless of size)

- A copy of the company's current Workers Compensation Certificate of Currency; and
- The name of the Return to Work Co-ordinator appointed by the company.

7.0 PLANT AND EQUIPMENT

The OHS Act and Part 3.5 of the Victorian OHS Regulations 2007 (more specifically Division 5) require that an employer manages all risks associated with the use of Plant and Equipment so far as is reasonably practicable.

Due to the volume of Plant & Equipment commonly used on construction sites, and the varying risk associated with each item and its use, a risk management approach is required, to ensure that the high risk items of plant receive the attention required to prevent incidents from occurring.

Monaco Hickey has developed a list of common Plant & Equipment that is identified as having additional risks, and therefore requires more stringent control to ensure its appropriate management on site. The controls implemented to manage these additional risks include but not limited to:

- Plant Inductions; and
- Review of daily Plant & Equipment checks.

Plant included on the list are as follows (but not limited to):

- Bob Cat
- Back Hoe
- Boom Lift
- Building Maintenance Unit
- Crawler Crane
- Concrete Pump
- Concrete Placing Unit
- Drilling Rig
- Electrical Pallet Jack
- Excavator
- EWP (Other)
- Fork Lift
- Generators greater than 50KVA
- Grader
- Hoist (material)
- Hoist (personnel & material)
- Lifts
- Lifting Equipment
- Mast Climbing Platform
- Mobile Crane
- Non Slewing Mobile Crane
- Piling Rig
- Roller / Compactor
- Scaffolds
- Scissor Lifts
- Tower Crane
- Traxcavator

7.1 PLANT REVIEW PROCESS (PLANT INDUCTIONS)

Monaco Hickey's Plant review process requires the supplier of the plant to provide the following details (not exhaustive) for each item of plant brought to site that falls within the categories outlined on the list above:

- The type of plant:
- The date last serviced:
- Details of the Plant Risk Assessment:
- Details of maintenance records (including records for 10 year checks if applicable):

Further to the above, the supplier of the plant is required to sign a verification that the plant is fit for purpose and has been serviced / maintained in accordance with the manufacturers recommendations.


A copy of Monaco Hickey's Plant Review Form is provided in the Subcontractor Documentation Pack.

7.2 MONACO HICKEY'S EXPECTATIONS:

Monaco Hickey's expectations of our subcontractors are as follows:

- Monaco Hickey's Foremen / EHS Facilitators are to be provided with notification and appropriate documentation for all Plant & Equipment being brought onto site that falls within the categories listed on the Common Plant & Equipment Checklist;
- The plant supplier is to complete the Plant Review Form and supply it at the time of the plant induction;
- No Plant & Equipment that falls within the categories listed on the Common Plant & Equipment List is to be used on site without first obtaining a plant induction; and
- All lifting equipment is to be inspected prior to each use.

A copy of Monaco Hickey's Common Plant & Equipment List and Project Plant Register, are provided in the Subcontractor Documentation Pack.



Plant Induction

Induction Number:

Date Inducted:

Company Name:

Project Name:

8.0 HAZARDOUS SUBSTANCES AND DANGEROUS GOODS

Hazardous Substances and Dangerous Goods have significant potential to cause harm to people, property and the environment if not managed appropriately. The following outlines definitions, legal requirements and Monaco Hickey requirements for bringing and / or storing Hazardous Substances & Dangerous Goods on site.

8.1 DEFINITIONS

Dangerous goods are classified on the basis of immediate physical or chemical hazards, such as fire, explosion, corrosion and toxicity that may affect life, health, property or the environment.

Hazardous substances are classified only on the basis of immediate or long-term health effects.

8.2 LEGAL REQUIREMENTS

Section 404 (Identification of Hazards) of the Victorian Dangerous Goods (Storage and Handling) Regulations 2000 states that:

1. *An occupier of premises where dangerous goods are stored and handled must ensure that any hazard associated with the storage and handling of dangerous goods at the premises is identified having regard to the state of knowledge of the hazard.*
2. *Without affecting the generality of subregulation (1), the occupier, when identifying hazards must have regard to –*
 - a. *Any information about the hazardous properties inherent to the dangerous goods, including a MSDS for the dangerous goods available to the occupier...*

Further, Section 4.1.23 of the Victorian OHS Regulations requires "an employer to ensure that a register is prepared and maintained in accordance with subregulation (2) of all hazardous substances supplied to the employer's workplace.

PLAIN ENGLISH INTERPRETATION

An MSDS is to be supplied for all Hazardous Substances and Dangerous Goods that are to be brought onto site.

All substances are to have their risks reviewed to ensure that they are the most appropriate substance for their intended application. E.g. where possible, utilising water based acrylic paints instead of oil based paints.

Further, a register of all hazardous substances and dangerous goods is to be maintained.

8.3 MONACO HICKEY'S EXPECTATIONS:

An MSDS is to be supplied for all Hazardous Substances and Dangerous Goods that are to be brought onto site.

The Hazardous Substance Register is to be updated with approximated quantities and submitted to a Monaco Hickey EHS Facilitator or Foreman each month while on site.

All storage areas are to have appropriate signage displayed.