



**WALKER, NEWMAN  
& ASSOCIATES PTY LTD**  
**COMMUNICATIONS CONSULTANTS**

ACN 070 745 265

## **Health Safety and Environment Management Plan**

WNA Document No. WNA-HSEMP-0001

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## ABOUT THIS DOCUMENT

**TITLE:** Health Safety and Environment Management Plan

**AUTHORISED:** Rick Newman (WNA)

**ABSTRACT:** This document provides a Health Safety and Environment Management Plan (HSEMP) for telecommunications engineering and consultancy works undertaken by WNA.

## DOCUMENT HISTORY

Rev	Date	Description	Author	Reviewed	Authorised
0	4/11/15	Issued for Use	RN	DC	RN
1	17/1/17	Include Return to Work section	RN	DC	RN
2	2/2/17	Revise Hazard Identification and Risk Management Section Revise Awareness, Training and Competency section Revise Project Management section Revise Incident Management section Revise Audit section Add Subcontractor Management section	RN	DC	RN
3	10/2/17	Add section for employee occupational health	RN	DC	RN
4	15/2/17	Issued for Use	RN	DC	RN
5	24/2/17	Issued for Use	RN	DC	RN
6	1/3/17	Issued for Use	RN	DC	RN
7	5/4/17	Issued for Use	RN	DC	RN
8	28/8/19	Issued for Use	RN	DC	RN
9	19/9/19	Issued for Use	RN	DC	RN

## SUMMARY OF CHANGES

Rev	Date	Section	Description
1	17/1/17	15	New section – “Return to Work”
2	2/2/17	9	Include Likelihood v Consequence Risk Assessment Matrix
		11	General revision to Awareness, Training and Competency section
		12	General revision to Project Management section
		14	Add Subcontractor Management section
		15	Revise Incident Management section to include further detail regarding incident investigation and reporting
		17	Revise Audit section to include further detail regarding HSE Management Review meetings, site inspections, etc
3	10/2/17	9	New section - “Employee Occupational Health”
4	15/2/17		Minor changes to pages 6, 13, 17, 20, 21, 22
5	24/2/17	15	Injury/disease classification system details included in HSEMP document.
		19	New section included specifically for Inspections.
6	1/3/17	5	New section included for Positive Performance Indicators.
7	5/4/17	11	New section 11 added for General Health and Wellbeing
8	28/8/19		General update to align with AS/NZS ISO 45001:2018
9	19/9/19	12, 14, 20	Wording changed to more explicitly align with AS/NZS ISO 45001:2018

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# 1 SCOPE

This document describes the Health, Safety and Environment Management Plan (HSEMP) to be used to ensure that engineering and consulting deliverables produced by WNA meet societal and industry expectations.

## 1.1 Process Approach

Work undertaken by WNA will follow consistent work flow/processes as described within this document. Deviations from these processes can only occur:

- Under specific direction of our client(s) and;
- With authorization from the WNA HSE Manager, Davide Ciotti.

Correspondence authorization deviations from the standard processes will be maintained in the project file for the individual activity/project.

The aim for WNA is to enhance customer satisfaction through the effective application of the HSEMP.

## 1.2 Document Management

A current version of this document will be available to all WNA personnel. The normal means of access will be electronic access to the WNA Public Directory, [Y:\WNA Policies](#). If personnel do not have access to the WNA Public Directory, they will be provided with a soft copy of this document.

Superseded versions of this document will be stored in folder [Superseded WNA policies and procedures](#)

All copies of this document issued to personnel will be legible, easily identifiable, and show the revision number.

## 2 CONTINUOUS IMPROVEMENT

Safety and environmental risks are managed to an acceptable level for activities undertaken by WNA employees and contractors.

The Plan-Do-Check-Act (PDCA) methodology will be adopted as the basis for continual improvement in the health, safety and environmental performance of work undertaken by WNA.

PDCA will apply to each activity/project, regardless of size.

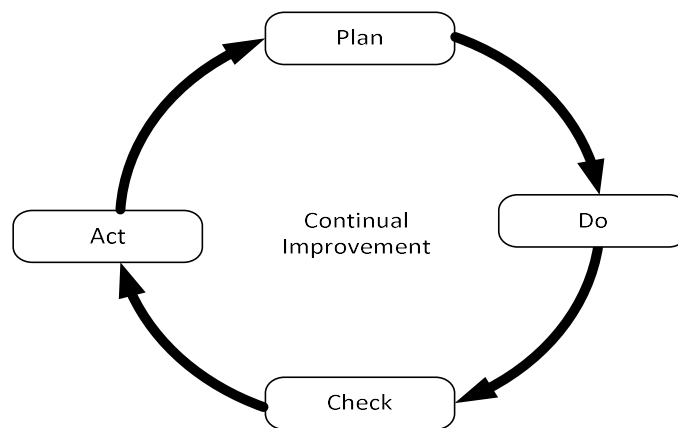


Figure 2 - 1: Model of a process based HSE management system

### Plan

- Policy & commitment
- Legal & other requirements
- Hazard identification and risk management
- Resource management

### Do

- Accountability & leadership
- Awareness, training & competency
- Project management

### Check

- Monitoring & measuring
- Incident management
- Audit

### Act

- Management review

It is the responsibility of the HSE Manager to:

- Promote continuous improvement
- Ensure that all elements of the HSE management system are kept up to date as improvements are made to processes, procedures, etc.

### 3 GENERAL OBJECTIVES

The general objectives of the HSEMP system are to provide:

- documented processes to cover situations where their absence could lead to deviations from HSE policy and objectives
- auditable criteria against which the HSE Management System is measured
- a basis from which to drive continual improvement

The elements define what must be achieved rather than how to achieve it. The elements describe requirements in the areas of HSE with the following aims:

#### **Health**

- Protect, promote, and improve the health and wellbeing of our staff and contractors
- Minimise and manage occupational exposures to our staff and contractors

#### **Safety**

- Provide a work environment where people are able to work safely and understand their rights and obligations towards a safe workplace

#### **Environment**

- Protect environmental and heritage values
- Promote the reduction and prevention of pollution, efficient use of resources and energy, and biodiversity protection
- Consider the environmental impact of our activities
- Design and implement systems which have a long term environmental impact which is as low as reasonably practical (ALARP)

## 4 SMART OBJECTIVES

WNA is committed to the following Specific, Measurable, Achievable, Realistic and Timely goals for HSE performance:

- Zero fatalities.
- Zero lost workday cases.
- Zero restricted workday cases.
- Less than two (2) medical treatment cases per million hours worked.
- Less than four (4) first aid cases per million hours worked.
- Zero environmental non conformances on any work we are responsible for.
- Zero near miss HSE incidents.

Measurement and analysis of Smart Objectives occurs on an annual basis as part of the management review process (refer section 20).



## 5 POSITIVE PERFORMANCE INDICATORS

In addition to measurement of outcome focused performance indicators, as listed in section 4, WNA is committed to the measurement of Positive Performance Indicators (PPI's) in accordance with document "Guidance on the use of Positive Performance Indicators", November 2005, published by the Australian Government, Department of Employment and Workplace Relations<sup>1</sup>.

The table below lists the PPI's used by WNA:

PPI Category	PPI in this category measure:	Performance Indicators	How to Measure
Risk Management	The extent to which workplace hazards are identified and associated risks are eliminated or controlled.  The extent to which non workplace related risks/issues are identified and considered within workplace planning.	<ul style="list-style-type: none"> <li>Percentage of reported incidents investigated, followed up and actions completed.</li> </ul>	Examination of HSE Corrective Action Notifications.
		<ul style="list-style-type: none"> <li>Number of unplanned leave applications due to personal or family related health issues.</li> </ul>	Examination of records.
		<ul style="list-style-type: none"> <li>Percentage of annual 'one on one' HSE 'refresher' sessions completed with WNA staff.</li> </ul>	Examination of records.
		<ul style="list-style-type: none"> <li>Percentage of 'one on one' HSE inductions completed with new personnel.</li> </ul>	Examination of records.
Management of Work Processes	The extent to which established safe systems of work are implemented.	<ul style="list-style-type: none"> <li>Percentage of work activities which are undertaken within a formal structured HSE management environment, whether WNA or clients.</li> </ul>	Examination of records.
Participation, Communication and Skills	The extent to which the working environment provides people with opportunities to contribute to OH&S.  The extent to which employees are involved in OH&S activities.	<ul style="list-style-type: none"> <li>WNA employees complete all requisite medicals and training in accordance with their individual requirements.</li> </ul>	Examination of records
		<ul style="list-style-type: none"> <li>An individual OH&amp;S plan is developed jointly by the employee and WNA HSE Manager and is agreed by the employee. This individual plan is re-assessed at least annually in a one on one meeting.</li> </ul>	Level of compliance with the objectives, actions, targets of the individual OH&S plan.
		<ul style="list-style-type: none"> <li>WNA employees understand the expectations and obligations related to OH&amp;S, and feel empowered to raise issues with WNA Management as and when required.</li> </ul>	Questioning during annual (or more frequent) one on one sessions.
Planning, Design and Procurement	The extent to which OH&S is addressed in the design, planning and procurement phases and activities of the work we do.	<ul style="list-style-type: none"> <li>Number of incidences where WNA breach an Australian or client OH&amp;S/HSE related standard in the design or implementation of any works.</li> </ul>	Client notifications. Employee notifications.
Monitoring and Review	The extent to which OH&S is assessed for the effectiveness of systems and practices.	<ul style="list-style-type: none"> <li>WNA Management completion of activities required under the HSEMP.</li> </ul>	Examination of records.

<sup>1</sup> Refer [http://www.safeworkaustralia.gov.au/sites/swa/about/publications/Documents/150/GuidanceOnUseOfPPIs\\_2005\\_PDF.pdf](http://www.safeworkaustralia.gov.au/sites/swa/about/publications/Documents/150/GuidanceOnUseOfPPIs_2005_PDF.pdf)

## 6 HSE POLICY

WNA's HSE Policy is provided below. This policy is displayed publicly on our web site, [www.wna.com.au](http://www.wna.com.au)



### Health, Safety and Environment – Policy Statement

Walker Newman and Associates Pty Ltd recognises its moral and legal responsibilities under legislation to provide a safe and healthy work environment and to uphold the highest standards with respect to environmental impact.

We follow this policy because it is the right thing to do, not because we feel obligated.

#### What we will do

The general wellbeing of our staff and those who work around us is our number one priority. We treat each person as an individual and take in to consideration personal circumstances in decisions we make.

Our policy commitment means that we will:

- Provide a safe and healthy workplace and working conditions for all, including employees, contractors, customers and visitors.
- Provide training to enable all employees to work safely.
- Comply with all relevant legislation and industry standards.
- Ensure that employees and subcontractors are appropriately trained, appropriately skilled, fit for the task and provided with all of the relevant information necessary to complete their work safely and without damage to the environment.
- Consult with customers, staff and subcontractors where relevant to enhance the effectiveness of procedures.
- Conduct investigations into all HSE incidents, including near misses.
- Conduct regular reviews and evaluations of the HSE systems in place.
- Follow all HSE requirements of our customers.
- Where our customers do not specify the HSE requirements for a particular project, we will apply industry best practice processes, determined from our experience.
- Not tolerate bullying, aggressive behaviour or discrimination, either towards our staff or instigated by our staff.
- Be sensitive to the issue of mental health. This includes a full spectrum of conditions ranging from stress, anxiety, feelings of isolation, depression and suicidal thoughts.

- Be cognizant of the major risk factors associated with the nature of the work we do, specifically: fatigue, driving, working in extreme (hot) temperatures, working on sites which we are not intimately familiar with. We will ensure that our personnel are aware of, and prepared for, these and other project specific risks.
- Take a holistic view of personal wellbeing, and work with customers, staff and subcontractors to achieve work/life balance appropriate to the individual's requirements as they change over time.

**What our staff are expected to do**

While at work, all staff – irrespective of their position – will:

- Not commence an activity until they are sure that it can be undertaken safely.
- Take reasonable care to ensure good HSE procedures are implemented at all times.
- Identify and support measures to eliminate or minimise unsafe conditions and/or environmental impact.
- Assume personal responsibility for their own safety and for those of other work colleagues by always operating in a safe and appropriate manner.
- Report all HSE incidents, including near misses.
- Communicate openly on all issues with WNA management.



**Authorised by: Rick Newman, Director**

**Date: 28<sup>th</sup> April 2016**

**Rev 1**

## 7 PRECEDENCE

WNA provide niche telecommunications engineering, contracting and technical services to our clients. Outside of our corporate office, in the majority of instances our clients have well established processes and procedures for HSE management in relation to the projects and sites with which our work is associated.

Our policy is that we will comply with the most onerous (highest) standard of:

- Legal/regulatory requirements
- Our clients HSE requirements
- Our own HSE requirements

## 8 MANAGEMENT RESPONSIBILITY

### 8.1 Management Commitment

WNA is a privately owned company. The working Director, Rick Newman, takes overall responsibility for the HSE Policy and for ensuring the promulgation of a safety culture throughout the company.

WNA's long term business viability is dependent upon it's reputation as a supplier of high quality, cost effective, telecommunications engineering contracting and consulting services which are delivered to the highest standards of health, safety and environment. These requirements relate to both:

- The direct activities related to undertaking our work.
- The long term 'legacy' which remains as a result of systems in which we have an involvement in any/all of the design, construct, commission and maintain activities.

The management of WNA are fully committed to ensuring the highest industry standards of health, safety and environmental management. We do this by:

- Following standardised processes (as described in this document).
- Working closely with our clients and, where applicable, other parties engaged by our clients, to obtain the best results.
- Employing highly experienced personnel to undertake activities and actively engaging with these personnel with respect to risk assessments, continuous improvement, etc.
- Allocating tasks based on the experience of the personnel, ie the right person for the job.
- Providing peer review of all documentation deliverables.
- Being honest about our capabilities. Declining an activity if we do not believe we are best suited to undertake it.
- Regularly seeking input from personnel as well as communicating expectations, responsibilities, authorities, etc.

The Director is responsible for:

- Ensuring that all resources (human, financial, environment, PPE, etc) required to undertake our activities with a level of HSE risk which is as low as reasonably practical are made freely available to the HSE Manager, WNA employees and subcontractors.
- The WNA Director will meet with the HSE Manager at least every six (6) months to review the resource requirements related to HSE.

### 8.2 Management Representative/HSE Manager

The WNA HSE Manager and Management Representative is Davide Ciotti, WNA General Manager

The responsibilities of this role include;

- Ensuring that the processes needed for the HSE management system are established, implemented and maintained.
- Monitoring the level of compliance to, and effectiveness of, the HSE management system and assessing the need for improvements.
- Ensuring that all personnel are aware of this HSEMP and their individual obligations under it.

- Meeting one on one with each employee at least once per year to review HSE performance, discuss HSE and emphasise WNA's commitment to the highest industry standards.

### 8.3 Management Review

The HSE Manager will review the performance of WNA against this HSEMP on a regular basis, at least every six (6) months. This review will include input from our clients. The review will cover;

- Customer feedback.
- Process performance and compliance.
- Status of follow up actions from previous reviews.
- Changes that could affect this HSEMP and recommendations for improvement.

### 8.4 Supervisor Responsibility

WNA personnel engaged to manage/supervise works on site shall have the following HSE responsibilities in addition to their other responsibilities of 'getting the job done';

- Ensuring that the clients processes/procedures which relate to HSE are fully complied with and fully understood by all WNA and subcontractor personnel working on site.
- Ensuring that WNA personnel and subcontractors on site understand their roles with respect to the work, have the appropriate PPE and are fit for work at all times.
- Facilitating daily toolbox/pre-start safety meetings (if these are not held by the client).
- Suspending work as/when there is a HSE risk.
- Escalating any issues of concern.

## 9 LEGAL AND DUTY OF CARE REQUIREMENTS

WNA will undertake work, and will design and implement telecommunications systems, in a manner which is fully compliant with all local, state and federal regulations which are applicable to the location of the work.

In order to ensure compliance with legal and other requirements, WNA:

- identifies and accesses applicable laws, regulations, approvals, licences, agreements and permits;
- ensures they are covered by the HSEMP specific to the work; and
- implements processes to check that requirements are being met.

WNA recognises a fundamental duty of care to:

- our staff
- our contractors
- those working in and around areas we are working
- those who are required to operate and maintain systems which we design and/or build
- members of the community who may be impacted by the work we undertake.

Beyond strict legal requirements, WNA recognise our Duty of Care obligations and will undertake all activities to the highest HSE standards.

## 10 EMPLOYEE OCCUPATIONAL HEALTH

WNA take our responsibility for ensuring that employees health, and those around them, is not put at risk by the activities which they undertake.

We do this by:

- Employees shall be briefed on the WNA Fitness for Work Policy prior to employment and prior to any change of role which represents a change in occupational health and safety (OH&S).
- An assessment will be made of the potential OH&S issues associated with each role prior to commencement of the role. This will be reassessed when the employee has 'settled in' to the role, typically after the first week, and again whenever the circumstances of the role may change. Any OH&S requirements will be addressed.
- Employees with roles which include regular/frequent site visits shall undergo medical checkups prior to commencing these roles, and at least every two (2) years whilst engaged in these roles. [For guidance, "regular/frequent site trips" means anyone who is on site for more than 5 days per month.]
- Employees who may be regularly exposed to sound levels >85 dBA in their roles shall:
  - Undergo audiometry testing prior to commencing these roles, and at least every two (2) years whilst engaged in these roles.
  - Be vigilant of the levels of noise they are exposed to. If in doubt, measure with a Sound Pressure Level (SPL) meter.
  - Limit their exposure to these noise levels to the extent possible.
  - Wear appropriate PPE complying with the requirements of AS/NZS 1269 and 1270.
  - Participate in WNA's hearing conservation program, which is in accordance with the requirements of the "National Code of Practice for Noise Management and Protection of Hearing at Work", embedded below:



NationalCodeOfPract  
ice\_NoiseManagemer

- Where employees may be exposed to particular health risks during the course of their work, an individual 'care' and monitoring plan will be implemented to ensure that the employee is not effected by that exposure. As necessary, this plan may extend beyond the period of the work.
- Employees are required to declare any medication they may be taking, or any medical conditions which they may have which could present a risk to themselves or others whilst on site, to WNA and to the client prior to commencing site works.
- Employees that have an ongoing medical condition, or other situation which could impact their ability to work safely, are required to communicate regularly and openly with WNA management regarding the condition.
- Employees will be subject to random drug and alcohol testing, and 'for cause' testing, prior to and during site works.
- Over and above any OH&S requirements which WNA has, employees must also comply with the OH&S requirements of client organisations/client sites where they may be working.
- Information related to the medical conditions/health of employees is treated with strict confidentiality, and shared only on a 'need to know' basis and with the approval of the employee.



## 11 EMPLOYEE GENERAL HEALTH AND WELLBEING

WNA take an active interest in encouraging our personnel to live healthy, active, balanced lives. To this objective we set the following measurable key performance indicators:

- Work/life balance
  - All employees are to have a minimum of 4 weeks (20 business days) of annual leave in each calendar year.
- Fitness for life
  - Employees are challenged to undertake 30 minutes of active exercise for at least 5 days in every week. (This fitness challenge is self reported.)
- Medical checkups
  - Employees are challenged to have at least one regular health checkup with a general practitioner every year. [This is not necessary if an employee has a work related medical.]
- Personal health and wellbeing challenge
  - Each employee is to set a personal health and wellbeing challenge at the start of every year. This could include such things as lose weight, monitor/manage blood pressure with diet & exercise, exercise regularly, attend regular yoga sessions, etc. (This challenge is self reported.)

We encourage our personnel to achieve these KPIs during regular discussions/meetings and measure the KPIs on an annual basis.

## 12 HAZARD IDENTIFICATION & RISK MANAGEMENT

WNA establishes, implements, and maintains procedures for ongoing identification of HSE hazards, assessment of risks, and determination and implementation of necessary controls.

- HSE risk management processes are applied to activities that WNA controls or can influence at both the broader business level and at the level of specific operational activities.
- HSE hazard identification and risk assessment, including development and implementation of applicable controls, is completed for direct activities (work in which we have a physical presence) and indirect activities (work to be undertaken by others based on our instruction or related to systems we have designed). This includes assessment, prioritisation and management, as appropriate, of the nature, scale and potential HSE impacts of activities.
- WNA's methods for HSE hazard identification and risk assessment:
  - are proactive;
  - provide the identification, prioritisation, assessment, and documentation of risks; and
  - determine the controls appropriate to manage assessed risks.
- The HSE hazard identification and risk assessment process and identification and implementation of suitable controls, involve people with relevant competence, including employees, contractors and other stakeholders as appropriate.
- A WNA HSE Pre-Placement Risk Checklist is completed by the HSE Manager and each employee prior to the employee commencing any new project. This checklist includes identification of health risks which may require occupational health monitoring.
- Risk management decisions are documented and the implementation of resulting actions tracked. Implemented risk controls are reviewed to ensure that the:
  - risk has been reduced to an acceptable level;
  - controls have not introduced new, unintended hazards; and
  - controls are effective in achieving objectives.
- WNA designs a cognisant of the hierarchy of controls:
  - Elimination
  - Substitution
  - Engineering controls
  - Administrative controls
  - PPE

WNA designs and procedures aim to implement the most effective means of control which is reasonably practical.

- WNA assess risks on the basis of the Likelihood and Consequence matrix in Figure 12 - 1 below.
- For any projects/activities where the risk is determined to be 'Orange' a Safe Work Method Statement (SWMS)<sup>2</sup> will be developed.
- For any projects/activities where the risk is determined to be 'Red' a Hazard Identification and Risk Assessment (HAZID) shall be undertaken. Refer [Risk Assessment Matrix.xlsx](#) for the WNA template for the HAZID. The objective of the HAZID is to identify the risks and develop mitigations which will result in the residual risk not being Red.

<sup>2</sup> These may also be referred to as Job Hazard Analysis (JHA) or Job Safety Analysis (JSA) in other organisations.

- Should an incident occur, or should an employee become aware of an unsafe work condition they are to:
  - Stop work immediately.
  - Instruct any other personnel in the immediate vicinity who may also be at risk to stop work.
  - Re-assess the activity and make changes to eliminate the risk, or reduce the risk to ALARP.
  - If it is not possible to reduce the risk to ALARP, the employee should make the workplace safe for others (eg barricade off) and escalate the issue to their supervisor(s).
- There shall be no negative consequences for an employee who genuinely stops work or removes themselves from a potentially hazardous situation, or who reports incidents, hazards, risks, etc.
- The nature of our work is such that potentially hazardous activities are undertaken on sites operated by our clients. Whilst working on these sites our personnel will comply with the HSE requirements of our clients and of the site. WNA personnel will be made aware of these requirements through client induction processes. These requirements include emergency preparedness.

Severity	Consequence				Likelihood				
	People	Assets	Community	Environment	A	B	C	D	E
					Never heard of in the industry	Heard of in the industry	Typically occurs more than once per year in the industry	Has occurred at the location	Has happened more than once per year at the location
					Estimated probability of occurrence				
<0.0001%	0.0001 - 0.001%	0.001-0.01%	0.01-0.1%	>0.1%					
0	No injury or health impact	No damage or loss of production	No impact	No impact					
1	Slight injury or health impact	<\$10K damage, no loss of production	Slight impact	Slight impact, no long term consequence					
2	Minor injury or health impact	\$10-\$100K damage, <12 hours lost production	Minor impact, local issue	Minor impact, some long term consequence					
3	Major injury or health impact	\$100K-\$1M damage, 12-24 hour lost production	Moderate impact, state issue	Moderate impact, long term consequence to local area					
4	PTD or fatality	\$1M-\$10M damage, 1-7 days lost production	Major impact, national issue	Major impact, permanent impact to local area					
5	Multiple fatalities	>\$10M damage, >7 days lost production	Massive impact, global issue	Massive impact, permanent regional impact					

Figure 12 - 1: Risk consequence versus likelihood matrix

- Emergency preparedness and response on client controlled sites is based on client processes and procedures. WNA management review these procedures with our clients on an annual basis (or more frequently if necessary) to ensure that our workers remain familiar and knowledgeable with respect to emergency procedures.
- Emergency preparedness and response procedures at the WNA office/warehouse are reviewed on an annual basis as part of the management review meeting.

## 13 RESOURCE MANAGEMENT

Successful HSE performance is largely related to culture (expectations) and people. Cultural benchmarks are set by the Company (WNA) and the industries in which we work. Realisation of satisfactory performance is however based largely on the abilities, attributes and attitudes of individuals. This is particularly the case with WNA, where much of our work is undertaken outside of any direct supervision by WNA supervisors/managers.

In selection of our people WNA place equal importance on the following:

- HSE attitudes
- Ability to work constructively and collaboratively in multi-disciplined, multi-organisational teams
- Awareness of, and suitability for, FIFO roster work and/or remote area work as may be applicable to the job
- Technical competency for the work

Recruitment of personnel is undertaken through a two tier hierarchical approach, being:

- Direct referral through our extensive network of personnel and industry contacts
- Placement of advertisements followed by screening and reference checks.

All personnel are interviewed by senior WNA managers prior to employment.

WNA would rather turn away opportunities than take on board personnel whom we are not fully confident of.

WNA personnel are encouraged and empowered to take personal responsibility for HSE within the framework of this HSEMP. Put simply, those working for WNA are responsible for the HSE implications of their own actions, and have a duty to carry out their work in a manner which does not create a risk to themselves, others, or the environment.

Anyone has the right and the responsibility to stop work or refuse to work in situations that may cause HSE harm, and bring these situations to the attention of those at imminent risk and to the attention of management.

Personal HSE objectives are a component of the performance review process.

Personnel who show a disregard for HSE, and/or knowingly put themselves or others at risk, may have their employment terminated.

WNA personnel will be made aware of WNA HSE performance, incidents, non conformances and internal audit results through email correspondence.

## 14 AWARENESS, TRAINING AND COMPETENCY

WNA ensures that any person under its control who performs tasks that may impact on HSE, is competent on the basis of appropriate qualifications, training and experience. Where personnel do not have appropriate background, WNA ensures that adequate training and/or supervision is provided to address any deficiency.

Further to this:

- WNA provide all new employees with an HSE induction. This covers:
  - WNA commitment to HSE
  - Fitness for Work
  - Stop work authority
  - WNA expectations with respect to appropriate behaviours
  - Familiarisation with the WNA HSE Policy and HSEMP (this document)
  - Specific HSE issues which the employee is likely to encounter in their role
  - Requirement to comply with client HSE policies and procedures
- The WNA HSE Manager will have a one on one session with each employee on an annual basis, or whenever the employee has a significant change of role, covering HSE. This session will include HSE refresher training as well as HSE training for any changes/new requirements of the employees role.
- The majority of our clients specify minimum requirements for personnel who undertake work on their sites. WNA ensures that these requirements are understood at both the (WNA) corporate level, and by the individuals.
- WNA maintain a register of qualifications, inductions, access approvals, etc, for all of our personnel. This register includes date of training, details of the training organisation and a copy of the training certificate. Training records are kept in a secure area on the WNA server indefinitely (ie they are not deleted).
- Training needs are identified on the basis of specific activities, specific locations and specific clients.
- WNA personnel engaged in supervisory roles must complete supervisor training applicable to the specific client/site/role. This may include permit to work (PTW) or authority to work (ATW) training. Supervisor HSE training/refreshers will be undertaken every two (2) years or more frequently if required by the client.
- Training provided includes regulatory and industry training requirements specific to the role of the individual (eg MSIC qualification of personnel working in the marine area).
- WNA personnel will not commence work until they have completed all necessary training and inductions related to the specific client/site/activities to be undertaken. The majority of WNA clients have their own site inductions – these must be completed in accordance with the clients processes (eg online, classroom, walk down, etc).
- WNA personnel will not undertake activities which they are not trained or competent to perform.
- WNA acknowledge our social responsibility to our personnel. We ensure that we are aware of personal circumstances as they change from time to time, and proactively work to achieve a work/life balance which is acceptable. We believe that a happy employee is more likely to be focussed on their work, be more productive, be safer and to stay with WNA for the long term.
- WNA's internal and external communications takes in to account diversity (eg gender, language, culture, literacy, disability, etc). We ensure that the measure has got through by the use of active listening methods.

## 15 PROJECT MANAGEMENT

Projects are activities with a predetermined time frame. Their unique character may introduce hazards and risks into the workplace, which require planning to ensure risks are controlled.

Assessment and management of HSE risks is an integral part of all phases of project work, including design, construction and commissioning.

In order to identify the specific HSE hazards, as well as assess and control the HSE related risks, WNA ensures that its project management systems and practices include consideration, consultation, documentation and communication of HSE aspects in all phases of project work: design; procurement; site works; commissioning; and close out.

WNA ensure that technical elements for design, construction and commissioning (including any modifications) are compliant with legislation and relevant industry codes and elements. Sound engineering practices and risk management principles are utilised (e.g., quantified risk assessment, HAZOPS, and HSE reviews).

WNA ensure that Scope of Work documents prepared for project activities clearly specify:

- Personnel qualification requirements.
- Personnel training and induction requirements.
- Legal requirements associated with HSE.
- Job specific hazards which may be encountered.
- Client requirements with respect to HSE.

Project plans consider HSE issues and incorporate controls establishing technical integrity and HSE specifications. HSE requirements are established, documented and understood.

Design reviews, constructability reviews and/or HAZID reviews including HSE aspects of an activity are undertaken as appropriate. These reviews are documented, including details of attendees, date, place, time, project, general items of discussion and agreed actions.

All WNA personnel working on projects in the WNA office must attend HSE briefings as and when these are held.

All WNA personnel (including managers, supervisors, engineers and technicians) and subcontractors working on projects on client sites must attend HSE briefings as required by the client.

WNA personnel working on client sites will hold a daily toolbox/pre-start safety meeting regardless of whether the client processes require this. (Where the client holds a daily toolbox/pre-start safety meeting there is no requirement for WNA personnel to hold a separate meeting.)

WNA personnel working on client sites will participate in team activities, HSE reviews, etc, as required by the client. This could include participation in OH&S reviews, team building activities, etc.

Best practice, continuous improvement opportunities, lessons learned will be shared with the WNA HSE Manager who in turn will share these with all personnel, or make changes to the WNA HSE Policy and HSEMP as appropriate.

## 16 SUBCONTRACTOR MANAGEMENT

WNA rarely engage the services of subcontractors. In 2015/16 less than 1% of our revenue was derived from the on sell of goods & services provided by other parties.

WNA will, however, take on a prime contractor role as and when directed by our clients. In such situations WNA will ensure that subcontractors required to undertake work at WNA's office or client sites:

- Are briefed by WNA on the HSE expectations related to the work they are being engaged to undertake
- Are provided with a copy of either the WNA HSE Management Plan, or client HSE Management Plan/requirements for the site at which they will undertake work<sup>3</sup>
- Provide documentary evidence of the skills, qualifications, competencies, etc, of their personnel, as required by WNA and the client, prior to the personnel being mobilised to site
- Commit to complying with WNA/clients minimum requirements for fitness for work (including random drug & alcohol testing), use of PPE, etc
- Actively engage and undertake HSE activities including participation in toolbox meetings, JHA/JSA development, Take 5's, muster exercises, etc

Subcontractors will only be engaged when they are assessed to meet an acceptable standard for safety and competency. These standards and competencies are assessed on a job by job basis, eg there is a significant difference between the requirements for an engineer to visit site to meet with client representatives and inspect a work area, compared with a technician who may be required to work in high temperature environments and manually handle large, heavy objects.

Subcontractors engaged to undertake work at WNA's office or client sites will be included as an integral part of a project/activity delivery team and shall take part in all pre-job meetings, kick off meetings, safety briefings, site walks, JHA/JSA development, toolbox meetings, etc.

WNA will include a review of subcontractor HSE performance at WNA's office or client sites as part of our normal audit and inspection program.

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<sup>3</sup> At all times the clients HSE Management System will take precedence over the WNA HSE Management System at a client site.

## 17 HSE PERFORMANCE MONITORING

WNA maintain accurate records of exposure hours (ie hours worked) but do not produce graphs of LWC, MTCR, RWDC, LTIF, TRCF unless specifically requested by a client.

WNA maintain records of incidents (near miss, medical treatment, etc) and non-conformities (situations where deviations to this HSEMP or client HSE requirements are discovered) in perpetuity.

WNA have experienced two (2) medical treatment case in our twenty (20) years of operation (2009 & 2018) and zero (0) LTI's.

WNA will, where requested by a client, provide exposure hour information to the client in order for the client to accurately calculate safety performance statistics.

WNA will investigate any near miss, medically treated injury or lost time injury as and when they might occur. Any such investigation will include the injured person, other personnel who may have been nearby at the time (witnesses), client representative(s) (as appropriate) and the WNA HSE Manager.

Details of the incident and investigation will be recorded using the WNA HSE Corrective Action Notification process.

There are four (4) classifications used to describe the type of injury or disease sustained: Nature of injury/disease, bodily location of injury/disease, mechanism of incident and agency. These classifications are made in accordance with the "Type of Occurrence Classification System, 3<sup>rd</sup> edition, May 2008" as provided on the Safe Work Australia web site.

For convenience, these classifications are indicated below:

### 1. Nature of injury/disease classification

Rank	Injury
1	Brain injury Fracture of skull Broken neck Spinal cord injury or lesion
2	Internal injury of the abdomen, chest or pelvis
3	Other head wound Open wound of neck or chest Traumatic amputation of limb(s)
4	Fracture of limb
5	Burn
6	Other injuries

### 2. Bodily location of injury/disease classification

Group	Location
1	Head
2	Neck



3	Trunk
4	Upper limbs
5	Lower limbs
6	Multiple locations
7	Systemic locations 71: Circulatory system 72: Respiratory system 73: Digestive system 74: Genitourinary system 75: Nervous system 78: Other and multiple systemic conditions
8	Psychological system
9	Unspecified

3. Mechanism of incident classification

Group	Mechanism
0	Falls, trips and slips of a person
1	Hitting objects with a part of the body
2	Being hit by moving objects
3	Sound and pressure
4	Body stressing
5	Heat, electricity and other environmental factors
6	Chemicals and substances
7	Biological factors
8	Mental stress
9	Vehicle incidents and other

4. Agency of injury/disease classification

Group	Mechanism
1	Machinery and fixed plant



2	Mobile plant and transport
3	Powered equipment, tools and appliances
4	Non powered handtools, appliances and equipment
5	Chemicals and chemical products
6	Materials and substances
7	Environmental agencies
8	Animal, human and biological agencies
9	Other and unspecified agencies

## 18 INCIDENT MANAGEMENT

All HSE incidents (near miss, first aid case, medically treated case, lost time injury, non conformity, etc) are to be reported to the WNA HSE Manager as well as (as applicable) our client (where such incident occurs on a client site). This reporting is to be made as soon as practical after the incident.

In the event of any HSE incident WNA will:

- In the first instance WNA will undertake the following activities as applicable to the circumstance:
  - ensure the well being of the person(s) involved.
  - apply first aid as required.
  - isolate any hazards and/or barricade off the site as appropriate to ensure other people are not put at risk.
  - act to limit the extent of damage to the environment.
  - suspend activities in the area until it is deemed safe to continue.
  - 'secure' the area to allow an investigation to commence.
- Immediately following triage activities WNA will:
  - notify/engage with our client (where work is being undertaken on a client site).
  - communicate the status of the incident to other personnel in the area.
- WNA will then commence a HSSE Corrective Action Notification process. This includes:
  - documenting the issue/problem/incident.
  - undertake a root cause analysis of the incident involving the person(s) involved, other witnesses, the client (as applicable), the Project Manager and WNA HSE Manager.
  - review literature for similar incidents and lessons learned.
  - assess/determine the required solution(s)/action(s) and assign responsibilities for implementing them
  - document the solution(s)
  - communicate outcomes to (as applicable)
    - person(s) involved in the incident
    - client representative(s)
    - WNA personnel and subcontractors
  - implement changes to procedures/practices which may be required. HSE Manager is responsible for ensuring that all actions are completed within the allocated timeframes. Individuals who are assigned actions are responsible for overseeing/implementing those actions and closing them out within the specified target date(s).
  - within six (6) months, review/evaluate the effectiveness of the changes.

Refer [WNA HSSE Corrective Action Notification Form.docx](#)

- HSE Corrective Action Notifications (which incorporate incident investigation reports) are saved at [..\WNA\\_HSE\Corrective Action Notifications](#) All HSE Corrective Action Notifications are stored and saved in perpetuity (ie they are not removed/deleted from the WNA documentation library).

## 19 RETURN TO WORK

WNA personnel may require absence from work for many reasons including:

- Illness
- Compassionate leave
- Recovery from injury (whether work or non work related)
- Break between projects

WNA do not differentiate between the reasons that a person has been absent from work and is now returning to work. In all cases we provide a supportive environment based on:

- Compliance with the WNA Fitness for Work policy.
- Encouraging and assisting each person back in to constructive roles which are within their capacity at the time, and which in no way present a hazard to themselves or others.
- Monitoring their progress/performance through the transition period until they are at full capacity.

This approach may mean:

- Modifying roles to suit the capacity of the individual (eg work from home, part time work, split roles, etc).
- Negotiating with clients to adjust roles.

Management of return to work plans falls under the responsibility of the WNA HSE Manager. The WNA HSE Manager will:

- Liaise closely with the person who is absent from work to fully understand their situation.
- With the agreement of the WNA employee:
  - Communicate directly (by phone/email) with the employees medical practitioner(s) to develop a return to work plan.
  - If necessary/appropriate, accompany the employee to the appointment with their medical practitioner(s), or meet separately with the medical practitioner(s), to fully understand/develop a rehabilitation plan.
  - Arrange for additional treatment/support as approved by the medical practitioner.
- Facilitate any changes/adjustments required to working environment, job role, etc.
- Ensure that the work undertaken by the employee is in accordance with the return to work plan agreed with the medical practitioner(s). Work undertaken by the employee during the return to work phase will be consistent with the restrictions placed by the medical practitioner(s).
- Communicate with all parties, including the client, throughout the return to work process.
- Ensure that the employee receives a final clearance from their medical practitioner(s) before they return to full duty (and that a copy of that clearance is provided to WNA and kept on file).
- Ensure that all medical records remain confidential.

## 20 AUDIT AND MANAGEMENT REVIEW

WNA are a privately owned organisation with a single office and staff of less than thirty professional engineers and technicians, all known individually by the Director and HSE Manager.

A formal audit is undertaken on an annual basis. Auditors are selected to ensure objectivity and impartiality of the audit process, in accordance with AS/NZS ISO 45001:2018.

Following the audit process there is management review meeting of HSE performance. Attendees include the auditor(s), HSE Manager and Director. Other individuals may be invited as appropriate. The annual management review meeting reviews:

- Actions from previous meeting.
- Review of the audit results.
- HSE performance for the past year:
  - Statistically (ie LTI, MTC, near miss)
  - Issues raised by clients.
  - Issues raised by staff.
- WNA HSE culture
  - What are our clients doing?
  - What is the general culture across WNA?
  - Are there any WNA individuals whose attitude to HSE does not align with WNA/industry standards?
- Fitness for work
  - Review individual circumstances of personnel. What considerations do we need to take account of when allocating projects/work to personnel over the next 12 months.
- Continuous improvement
  - What practical things can we do to reduce risk/exposure and improve HSE performance/culture.
- Review/recommit to all aspects of the HSE Management System including:
  - HSE Management Plan
  - HSE Policy
  - Fitness for Work Policy
- Actions for next 12 months.

The standard agenda for the management review meeting is at [WNA HSE Annual Management review meeting - standard agenda.doc](#)

Results/outcomes from management reviews will be communicated to all WNA personnel.

## 21 INSPECTIONS

Inspections are undertaken in the event of any incidents where this is possible (ie if an incident occurs on a client site it may not be possible for WNA management to undertake an inspection).

The WNA HSE Manager undertakes a HSE inspection of the WNA office<sup>4</sup> every three months.

WNA personnel working on client sites are responsible for inspecting their work sites, work areas, tools, PPE, etc on a regular (at least weekly) basis in addition to complying with any requirements which the client may have for workplace inspections and audits. These inspections shall be documented/recorded using a Take 5.

When a problem is found through an inspection a Corrective Action Notification process is initiated. This includes:

- Documenting the issue/problem.
- Assess/determine the required solution(s)/action(s) and assign responsibilities for implementing them.
- Document the solution(s)
- Communicate outcomes to (as applicable)
  - person(s) who work in the area, or who are responsible for the area
  - client representative(s)
  - WNA personnel and subcontractors
- Initiation of action(s) to address the problem(s)
- Implement changes to procedures/practices which may be required.

HSE Manager is responsible for ensuring that all corrective actions from inspections are tracked and measured to verify completion within the allocated timeframes. This is achieved by a weekly review of the status of outstanding actions.

Individuals who are assigned actions are responsible for overseeing/implementing those actions and closing them out within the specified target date(s).

Within six (6) months, the HSE Manager will review/evaluate the long term effectiveness of the changes.

Refer [WNA HSSE Corrective Action Notification Form.docx](#)

HSE Corrective Action Notifications (which incorporate incident investigation reports) are saved at [..\\WNA HSE\\Corrective Action Notifications](#) All HSE Corrective Action Notifications are stored and saved in perpetuity (ie they are not removed/deleted from the WNA documentation library).

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<sup>4</sup> Note that WNA are a medium business with only one location, that being an office in which, typically, 3-5 personnel undertake office based design and administrative functions. All other WNA personnel operate from client sites or home offices.