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**MANHARI**

METALS

Health, Safety, Environment & Quality Manual

Also referred to as IMS Manual

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This document is subject to audit. As a part of continual improvement, version control of all forms issued from this document shall maintain the current version control of the master IMS Manual in their format.

***Note***

Comments on this HSEQ manual are always welcome and encouraged.



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# INTRODUCTION

Manhari Metals opened its doors to scrap metal recycling in 2007 and has since grown to become a renowned name in Victoria’s Metal Recycling industry. Manhari International started off by opening its gates to the public and industrial drop off only and slowly started industrial pickups by taking advantage of its fleet of trucks.

Manhari Metals endeavour to offer excellent service and building long term associations with their clients, offering them the best scrap metal prices in all of Victoria. Currently, they are one of the biggest exporters of steel & aluminium in Victoria, exporting reclaimed metals all around the world including to the manufacturing giants, India and China. All up, Manhari Metals exports to more than 26 countries across the globe.

Melbourne Operations

The Melbourne operations in Tottenham is made up of several buildings as well as several functional business streams, these include:

* Brass and Copper
* Paint (paint covered metals)
* Non-ferrous metals
* Ferrous metals

With just under 3200m2 of building space spread over three main buildings at Summerville Road, there is a sizable operational footprint. With staff numbers currently at 20 personnel, they expect their staffs to remain stable for the near future, while utilising contract labour during periods of higher demand. Running one shifts from 6am to 3pm, production requirements can be fulfilled during this period.

Located 12km west of Melbourne in the suburb of Tottenham, it is just off the Princess Highway (M1) to Geelong and the greater western district. Tottenham is a large industrial suburb west of Melbourne.

#### fIGURE 1: lOCALITY mAP

|  |  |
| --- | --- |
|  |  |

#### Figure 2: Arial View of Business Operations



# SCOPE OF THE MANAGEMENT SYSTEM

The scope of the management system covers all the services offered by Manhari Metals by Melbourne Site (Manhari Metal Recycling, 414 Summerville Road, Tottenham 3012 Victoria). The scope of the management system does not include Horsham Site (42 Hamilton Rd, Horsham VIC 3400). Services offered by Manhari include:

Free Pickups

Have you been paying loads of your money to get rid of your waste metal scrap, Good news for you, we do it for free and on top of the that we pay you for that.

Free Bins

We will supply free bins for your scrap metal, various sizes are available such as 4'x4', 6'x4', 8'x4' and more.

Free Car & Truck Removal

We remove old truck and car bodies free for you.

Factory Cleanups

Now you don’t have to spend money on scrap metal factory cleanup because we clean out all the waste and scrap metal from your factory for fee and you’ll get paid.

Domestic Sales

We also retail locally with our domestic sales of scrap metal products increasing all the time. We sell to other recyclers, scrap dealers or member of the public. If you are looking for a particular product, come in and see us.

Combined with our scrap steel sales we also offer a range of second hand items such as antique and rustic garden art pieces. We currently have a great range of old spoked wheels and farm machinery pieces for sale.

Do we Export?

The answer is Yes, we do Export all sort of scrap metal all over the world. Currently, we are one of the biggest exporters of steel & aluminium in Victoria and exporting most of the scrap metal products all around the world including the biggest manufacturing giants like India & China.

Some of the products we offer

* UBC
* CANDY
* DRUID
* ELMO
* HONEY
* TREAD
* TROMA
* TAINT TABOR
* HMS 80/20
* LMS BUNDLES
* CAR BUNDLES
* STAINLESS

Not Applicable Clauses of ISO 9001:2015:

* Clause 8.3 of ISO 9001:2015 (Design and Development), Design and development requirement is not applicable since our services does not require a design function. We offer metal recycling services which does not require any design and development.

# PROCESS MAP

The following flow chart describes is a high-level process map of Manhari Metals (i.e. how inputs are transformed into outputs).

1. **Incoming materials (i.e. input):**
   1. Old cars and trucks received from wreckers (Cars are only accepted when the fuel tanks and gas bottles are removed)
   2. Filled bins with scrap metals from businesses (Materials are received in bins or trailers; the bins are weighed in the weigh bridge). See below picture



These bins are either dropped off by our suppliers or can be arranged to be picked up from the supplier's site depending on the nature and quantity of the scrap. If a supplier chooses to drop in scrap metal, they simply can drive into the yard from the service gate where they get redirected to either the non-ferrous section or ferrous section by traffic controller based upon the nature of the material being dropped off.

All pickups need to be booked via phone at least 24 hours prior to the pickup. Once a pickup is booked, the logistics manager then assigns the job to a particular driver via our bin manager app.

Metals include aluminium, steel, copper, brass and soft lead and lead wheel weights (1 container in 6 months). Leads are stored in IBCs.

* 1. Lead acid batteries
  2. All the compressors have to be free from gas and should be certified to be free of gas. (obtained from wreckers who are certified).
  3. Rubber products are separated, and they are stored in IBCs or pods and then disposed a waste management company.
  4. Fuels used is diesel and unleaded petrol to fuel fleet of company owned mobile vehicles and equipment.
  5. Gas bottles - argon, Co2 for welding, cutting operations and forklifts
  6. Electricity supply

1. **Sorting / Segregation**

Metal is generally classified into two broad categories i.e. ferrous and non-ferrous metal.

Most of the non-ferrous material we receive is already pre-sorted, all other mix loads are sorted either via manual handling such as cutting, grinding, stripping, etc or by shredder (in case if they are mixed with ferrous scrap).

Ferrous metals are further classed into two categories i.e. light gauge & heavy gauge scrap. Specialized equipment such as metal handlers is used to segregate light gauge from the heavy gauge.

1. **Process of materials**

This includes vehicle dismantling and baling, shredding and shearing

A picture containing truck, car, green, train

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baler

Vehicle dismantling

1. **Packing and shipping of materials**

The segregated metals are then packed and exported. Some of the metals are packed in containers.

1. **Products / Output delivered to customers**

|  |  |
| --- | --- |
| **Product / Outputs** | **Picture** |
| Bailed vehicles |  |
| Sheet Cutting Aluminium |  |
| Lead |  |
| Fabricated scrap |  |
| Extruded aluminium (i.e. clean aluminium mixed mill finish, painted and anodised extrusion) |  |
| Tough Tabor Aluminium (Clean, mixed old alloy sheet aluminium, free of non-metallic items, e.g. dirt, plastic, bottle caps) |  |
| Tense Aluminium (i.e. Mixed aluminium castings – may contain auto and aeroplane castings such as radiator shells). |  |
| Copper Insulated Wires |  |
| Batteries |  |
| Metal swarf |  |
| Starter Alternator |  |

# QUALITY POLICY

Manhari Metals recognise its responsibility to exceed all customer expectations. This commitment extends to ensuring that the Manhari Metals’ operations do not place any client or member of the public at risk from the activities undertaken. All relevant legislation will be adhered to and reviewed for updates as a hallmark of what we deliver.

Manhari Metals is committed to providing consistent quality services to its clients and seeks through proper and timely feedback to continually improve its services to meet the requirements of the clients now and into the future. Top management will meet with senior representatives of the client/s on a periodic basis at regular intervals to ensure those quality and service goals and standards are met. In accordance with the above, Manhari Metals top management will attend, where requested, any meeting called by the client related to any matter of performance of its services or improvement of those services and commits itself to these principles.

Manhari Metals is committed to effective implementation of the Quality Management System (QMS) in compliance with the ISO 9001:2015 Standard. The QMS is continually reviewed and improved. The company strives to achieve this by:

* Promoting an understanding of our customers’ needs and expectations throughout the organisation, together with a culture of exceeding customer expectations.
* Incorporate a risks management approach within the business to effectively manage risks and leverage opportunities.
* Developing seamless processes by fully integrating the services provided by our suppliers.
* Monitoring our performance through performance metrics (Inspections & Internal audits) to continually improve our processes and services.
* Ensuring that management on all levels communicates and explains the quality policy to all employees so that everyone is familiar with the policy and its intent.
* Establishing, reviewing and communicating company’s quality objectives to all levels in the organisation. The objectives are monitored on an ongoing basis through the quality management plan and reviewed during planned management review meetings.
* Utilising the company’s HSEQ Management System on all company processes everywhere, every time, without exception.
* Reviewing this policy for its adequacy during planned management review meetings.
* Follow the required documentation processes as laid down in this manual and maintain all records accordingly to ensure compliance is met and detailed.

Manhari Metals will by way of preference only engage contractor/s and other third party organisation/s that meets the principals and commitment to quality and safety as laid down in this HSEQ Manual. This policy will be communicated to both the internal and external stakeholders by displaying it at strategic locations.

Signed \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Director)

***Manhari Metals***

Objectives

Manhari Metals will:

* Understand the needs of the client.
* Provide written procedures and instructions to ensure consistent systems of work
* Ensure compliance with legislative requirements and current industry standards.
* Provide information, instruction, training and supervision to workers and contractors to ensure they can perform their duties.
* Deliver quality and promote continual improvement at all levels of the workforce.

Responsibilities - Senior Management (Directors)

* Top management is accountable for implementing this policy. This will be measured via their ongoing periodic reviews and where contracts specify, client/company annual performance reviews.
* The provision and maintenance of all equipment used by their staff.
* Involvement in the development, promotion and implementation of quality policy and procedures.
* Training workers in the performance of their assigned tasks.
* To ensure workers will always have adequate resources to perform all tasks.
* The provision of resources to meet the client’s requirements. Whilst the Company has significant existing resources, where shortfalls are not anticipated, however, resources are allocated depending on -
  + Severity, loss of life, damage to property;
  + Existing contract obligations;
  + Other considerations compliant with HSEQ Manual; and
  + New works or new customers.

Workers are to:

* Follow all policies and procedures.
* Ensure customer satisfaction at all times.

The Top Management of Manhari Metals have defined and documented Manhari Metals’ quality policy and related measurable objectives. These documents are located within the HSEQ Manual.

# OCCUPATIONAL HEALTH & SAFETY POLICY

Manhari Metals is committed to providing a safe and healthy workplace for all our employees. Manhari Metals further recognises its responsibilities to provide a safe and healthy work environment for contractors, clients, visitors and the public.

Creating a safe work environment and care for the environment is the responsibility of all (ie., personnel and contractors at every level of the Company. This will be achieved by:

* Complying with all relevant OHS legislation, applicable industry standards, customer requirements, OHS Regulations, codes of practice/compliance codes, guidelines as well as any other requirements related to the management of OHS hazards as a result of our operations.
* Establishing, reviewing and communicating OHS objectives and targets that are measurable to all levels in the organization. The objectives and targets are monitored on an ongoing basis and reviewed during the management review meetings.
* Identifying and reducing the OHS risks using the hierarchy of controls for all types of work activities that have the potential to produce occupational illness and injury.
* Encouraging all employees and contractors to report all workplace hazards, incidents, and near-misses.
* Focussing on ongoing improvement in the areas of OHS training, accident prevention, hazard management, injury prevention, incident and near-miss reporting, rehabilitation and health preservation.
* Provide and maintain plant and systems of work in a safe manner.
* Ensuring appropriate information, instruction, supervision, communication, induction and training are provided to all employees including its leaders, managers and supervisors as well as other employees and contractors prior to commencement of work, and ensuring all employees and contractors are aware of these resources and participate proactively in OHS matters.
* Involving all employees and worker’s representatives in occupational health and safety matters and consulting with them on ways to recognise, evaluate and control workplace hazards.
* Commitment to be inclusive in consultation, communication and participation between senior leaders, its employees and worker’s representatives on its decision-making processes on OHS management system policies and procedures through forums such as regular Toolbox Meetings.
* Ensuring that everyone (including visitors and contractors) complies with appropriate standards and workplace directions to protect their own and others health and safety at work.
* Providing adequate systems & resources to effectively manage rehabilitation & return to work processes.
* Ensuring as far as practicable all operations conducted by employees and contractors are in accordance with relevant legislation and regulatory requirements and relevant industry standards.
* Applying a systematic approach to identifying, assessing and controlling workplace hazards and risks.
* Facilitating continuous improvement through periodic review of objectives and performance measures, systems, practices and procedures to ensure their continued effectiveness and relevance.

To achieve this stated policy outcome, the commitment and contribution of each employee is required through:

* Taking responsibility for the health and safety of themselves and their fellow workmates.
* Not compromising health and safety in the mistaken belief that other requirements are more important.
* Considering health and safety as an integral part of our work.

Signed \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Director)

***Manhari Metals***

# ENVIRONMENT POLICY

Manhari Metals endeavours to minimize negative effects and to maximize positive effects on the environment and to work towards the achievement of sustainable development through continual improvement.

The environment is recognised as a strategic issue to be addressed in all our work. In all its activities Manhari Metals will seek to:

* Promote the conservation and sustainable use of natural resources.
* Minimise environmental pollution and waste in all of its own activities.
* Build environmental concerns into all its policies, programmes and services and integrate environmental information into all levels of its management structure.
* Achieve continuing improvements in environmental performance and management system, over and above regulatory and legislative requirements.
* Work in partnership with other organisations to promote the health of the environment.

To achieve this Manhari Metals will:

* Complying with all relevant Environmental legislation, applicable industry standards, customer requirements, Environmental Regulations, codes of practice/compliance codes, guidelines as well as any other requirements related to the management of Environmental hazards resulting from our operations.
* Set environmental objectives and targets in carrying out all its activities and monitor its performance against those objectives and targets.
* Adopt working practices that minimize negative effects and maximize positive effects on the environment.
* Train and educate its entire staff in respect of its environmental policies and objectives.
* Strive to continually improve its performance regarding environmental issues.
* Fulfil all relevant environmental obligations
* Not provide misleading environmental claims.

Signed \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Director)

***Manhari Metals***

# EMERGENCY CONTACT NUMBERS

|  |  |
| --- | --- |
| **EMERGENCY SERVICES** | **PHONE** |
| **ENVIRONMENTAL PROTECTION AUTHORITY (EPA)** | **1300 372 842** |
| **WATER SUPPLY – CITY WEST WATER** | **132 642** |
| **JEMENA** – Emergency Faults – 24hrs  **POWERCOR** – Emergency Faults – 24hrs | **131 626**  **131 280** |
| **WORKSAFE VICTORIA** | **13 23 60** |
| **SUNSHINE HOSPITAL** | **03 8345 1333** |
| **SPIN CHAT MEDICAL CENTRE (4 MINS)** | **03 9418 0490** |
| **POISONS INFORMATION CENTRE** | **131 126** |

See below for emergency procedures

# EMERGENCY PROCEDURES

Building and premises emergencies may arise at any time. They can develop from several causes including fire, chemical spills, gas leaks, bomb threats, structural faults and civil disturbance. Any of these may threaten the safety of workers.

Manhari Metals is committed to establishing and maintaining procedures to control emergency situations that could adversely affect workers.

Manhari Metals will ensure the workplace has procedures in place to address emergency situations.

Where necessary, emergency personnel will be nominated, trained and ready to act in an emergency. Training of such personnel may include attendance at emergency procedure training conducted by the building owner.

Where an emergency does arise, the emergency personnel will be responsible for taking control of the situation and ensuring all workers are evacuated from the workplace in accordance with the workplace emergency procedures.

Emergency evacuation exercises will be conducted annually to test emergency procedures. All workers will be required to participate in the emergency evacuation exercises. The exercises will be observed and the outcomes reviewed to determine the effectiveness of the procedures in place. The outcomes will be recorded using **Evacuation Debrief Form**.

The emergency procedures will be communicated to all workers and visitors as part of the induction process.

The emergency procedure, or a summary of, should be readily accessible by workers or displayed in a prominent location within the workplace.

Medical Emergencies

In the event a medical emergency arises and someone requires emergency medical attention, the following procedure will be adopted:

1. The situation will be assessed to ensure personnel safety
2. Help will be summoned from others in the immediate vicinity, or a nominated first aid officer. The affected worker will not be left unless it is unavoidable
3. The alarm will be raised and emergency services contacted. Clear instructions will be provided to emergency services on:
   1. the location of the worker and directions to the workplace
   2. the details of casualty (type of injury, age and condition of worker)
   3. the time of injury or illness.

Bomb Threats

In the event a bomb threat is received, the following procedure will be adopted:

1. The worker receiving the bomb threat by telephone should not hang up, but instead should stay on the phone and take notes of the conversation
2. The caller should be kept on the line for as long as possible, and asked to repeat the information provided and for additional information about the threat
3. Where possible, someone else should listen in to the call
4. Management, and any building security/management, should be contacted to evaluate whether an emergency evacuation is required.

If an evacuation is ordered in response to a bomb threat, all workers should quickly check their work area for any unusual objects and mark these with a sheet of paper without touching the object. They should then leave the building as instructed. The location of any unusual objects must be reported to the floor warden, building security or the attending emergency services.

Fire

In the event a worker discovers a fire, the following procedure will be adopted:

1. The worker should assess the situation and the safety of anyone in the immediate vicinity
2. The worker should immediately call for help or operate the nearest fire alarm and have someone advise the nominated emergency co-ordinator or fire warden
3. Where it is safe to do so, the worker should attempt to put out the fire with a nearby fire extinguisher, aiming the extinguisher at the base of the flame
4. If it is not safe to do so, the fire increases in size, or the extinguisher runs out, the worker should evacuate to the nearest evacuation assembly point.

In the event a fire alarm is sounded, the following procedure will be adopted:

1. Warden/management staff will contact emergency services
2. All workers should leave the building immediately via the nearest emergency exit to the nearest evacuation assembly point
3. Any missing worker will be reported to a fire warden or emergency services.

Fire exits will be kept clear from obstruction at all times. Fire extinguishers will be located in conspicuous, readily accessible locations in the workplace. A clearance of 1000mm must be maintained around each fire extinguisher. Signage that complies with AS 2444-2001 Portable fire extinguishers and fire blankets will be displayed. All workers must know their evacuation route and assembly point in case of a fire.

At all times workers should remain calm. Workers should not run, panic or take belongings with them when evacuating. The building will not be re-entered until it has been cleared as safe to do so by the emergency co-ordinator/fire warden or emergency services.

Plant strikes an electric line

Plant operator

1. If possible, break the machinery’s contact with the electric line.
2. If it is not possible to break contact with the electric line, remain within the plant and **do not** leave the cabin until the power has been disconnected and the ‘all clear’ has been given.
3. Do not jump clear of the machine. Only jump in case of fire.

This should done by jumping well clear of the plant with their legs together and keeping their legs as close together as possible with both feet in continuous contact with the ground while shuffling away from the machine.

1. Alert persons working with you.
2. Notify your manager/supervisor and the office immediately.

Supervisor

1. All persons must be kept a minimum of 8 metres clear of the machine and the cable until the utility provider has made the electric line safe.
2. Untrained, unequipped persons should not attempt to rescue a person receiving an electric shock, as this may also result in injury to the person rendering assistance.
3. Contact the utility provider and ask them to make the electric line safe.
4. Wait until the ‘all clear’ is given to you by the utility provider.
5. Once ‘all clear’ is given, ask the operator to leave the cabinet.

Office administration

1. Notify Worksafe and ensure that site is preserved (i.e. the site cannot be disturbed until a Worksafe inspector attends the site or advises that site preservation can be lifted).

Chemical Spill

1. Notify your supervisor / manager.
2. Check the SDS for best method to clean up.
3. Wear appropriate PPE as per SDS

* Chemical resistant gloves.

1. Cover any drains at risk to prevent substance entering storm water systems.
2. Absorb the spill.
3. Clean up and dispose at the recovery centre or by a licensed hazardous waste management company.

* Gather spillage debris and place in suitable impermeable (i.e. liquid proof) containers.
* Upon return to the Depot, place spillage debris into the dedicated spill containment drums/containers.

1. Attach copies of the product SDS to the drums containing the spilled waste.
2. Arrange for Spill Kit materials to be replenished.
3. Report the incident in writing.
4. Emergency will be deemed to be terminated only under instruction by Chief Warden/Management.

Mains Gas Leak

Person Discovering

1. Alert persons in the vicinity of the leak.
2. Turn off ignition sources and gas, if safe to do so and aware of how this should be done.
3. Notify your manager and the office immediately.

Office Administration

1. Note details of emergency, exact location, situation and name of person advising.
2. Inform the Chief Warden.
3. Notify Fire Brigade.

Chief Warden

1. Where applicable, evacuate persons from the affected area (or building if a major leak) and assemble them in a well-ventilated area where they are not exposed to further risk. Wind direction should be monitored to ensure that the gas is not re-directed to the assembled area and pose a further threat.
2. Ensure no naked flames or smoking throughout the building.
3. Ensure the affected area is well ventilated.
4. Do not allow any electrical equipment to be operated in the immediate vicinity and do not touch any electrical equipment.
5. Ensure no cordless or mobile phones are used in the vicinity.
6. If safe to do so, isolate gas supply.
7. Notify gas company.

Gas Cylinder Leak

Person Discovering

1. Alert persons in the vicinity of the leak.
2. Turn off ignition sources and gas, if safe to do so and aware of how this should be done.
3. Notify your supervisor and the office.
4. Eliminate any other hazards (e.g. incompatible materials) if safe to do so.
5. Dry Chemical or CO2 extinguishers should be used on small fires, or water spray or fog for large fires, if trained and safe to do so.

Office Administration

1. Note details of emergency, exact location, situation and name of person advising.
2. Inform the Chief Warden immediately.
3. Notify Fire Brigade.

Chief Warden

1. Confirm area is safe to approach.
2. Colleagues or other persons must not enter any confined area where there is a risk of being overcome by gas
3. Where applicable, evacuate persons from the affected area (or building if a major leak) and assemble them in a well-ventilated area where they are not exposed to further risk. Wind direction should be monitored to ensure that the gas is not re-directed to the assembled area and pose a further threat.
4. Ensure no naked flames or smoking throughout the building.
5. Ensure the affected area is well ventilated.
6. Do not allow any electrical equipment to be operated in the immediate vicinity and do not touch any electrical equipment.
7. Ensure no cordless or mobile phones are used in the vicinity.
8. If safe to do so, isolate gas supply.
9. Notify Gas Company.

Dust Storms / Wind Storms

Worker

* If strong winds are anticipated, ensure that any objects that could become airborne in strong wind gusts and cause damage are brought under cover and (where possible) secured.
* If torrential rain is likely, ensure that windows and doors are closed to minimise water ingestion.
* If a severe electrical storm is anticipated, review safety precautions concerning critical processes or outdoor work activity (staff and contractors) with applicable specialist personnel – caution persons concerning use of electrical equipment such as phones and computers. Monitor passage of storm cell/s and temporarily suspend outdoor movement if risk of lightning strike.

Incident Report

Where the workplace is affected by an emergency, Manhari Metals will complete an **Incident Report** **Form** as soon as reasonably practicable to identify the causes of the emergency, any control measures that can be implemented to prevent re-occurrence and improvements to the above emergency procedures.

# COMPANY ORGANISATION CHART

# SCOPE OF THE HSEQ MANUAL

**Work instructions**are provided within the operating area as necessary, to define how specific tasks are to be performed, and where applicable, include acceptance criteria for workmanship. These work instructions are identified within process descriptions and controlled as part of the HSEQ Management System.

Forms and Records

Some forms, when completed, shall be retainedto maintain a record of business activities performed in accordance with requirements of this quality system. Please refer to ***Appendix 1***

HSEQ Quality Manual

*This document* (HSEQ MANUAL) – defines the scope of the QMS, policies, organisation, and Top Management responsibilities necessary to implement the appropriate requirements of ISO 9001: 2015, ISO 45001:2018 and ISO 14001:2015 within Manhari Metals. In addition, the HSEQ Manual refers to the principal Manhari Metals processes required to comply with each of the ISO 9001: 2015, ISO 45001:2018 and ISO 14001:2015 - seven sections (**4 to 10 note these are written in bold**). The number reference system to the International Standard has been carried into specific sub clauses of this document to aid ease of understanding for compliance review.

Manhari Metals have determined that all clauses of ISO 9001:2015, ISO 14001:2015 & ISO 45001:2018 are applicable to its HSEQ system.

Below sections describe how some of the key requirements of ISO 9001:2015, ISO 14001:2015 & ISO 45001:2018 are applicable to Manhari Metals HSEQ system.

Appendix 1 – Control of Documentation procedure

Control of Documented Information (Documents)

It is Manhari Metals policy to affect control over all HSEQ quality related documentation, including ownership, registration, review, approval, maintenance, removal or changes and storage to all Manhari Metals HSEQ documents including any customer documents held by Manhari Metals.

Control of Documented Information (Records)

Manhari Metals quality records shall all be checked for legibility and be:

* Retained/stored in a manner to prevent damage, deterioration or loss.
* Organised for ease of retrieval when required.
* Exclusively identified with a version control on each document.
* Retained and disposed of according to timing and authority stated in a written procedure.

Appendix 2 – Control of Quality Records Procedure

Planning of changes and control of changes to requirements of services

Changes shall be managed and executed according to the change control process.  The control process will ensure that changes proposed are reviewed, authorised, tested, implemented, and released in a controlled manner; and that the status of each proposed change is monitored. All users, significantly affected by a change, shall be notified of the change.  The user representative shall sign-off on the change.

LEADERSHIP AND COMMITMENT 5.1

Manhari Metals is committed to continual improvement of the management system by monitoring its effectiveness and exploitation of improvement opportunities. The need to meet customer and statutory/regulatory requirements is communicated to all workers.

The Manhari Metals HSEQ Policy supported by measurable Quality Objectives are set for each of the principle Manhari Metals processes and measured by performance indicators. In principle, these KPIs are taken from contract documentation and may also be derived from specific customer requirements and quality compliance needs. These Key Performance Indicators (KPI’s) are communicated to all workers.

The effectiveness of the Management System is reviewed regularly (bi-monthly) during which Key Performance Indicators are reviewed to monitor the improvements achieved. A specific task of the Management Review is to monitor all resource needs of Manhari Metals for the immediate and longer-term business periods.

Customer Focus 5.1.2

It is Manhari Metals policy to acknowledge the needs of all the stakeholders and strive to monitor satisfaction of these by means of measurable objectives.

Customer Satisfaction and Perception of provided service quality is monitored are a prime KPI used to assess HSEQ Management System effectiveness.

POLICY 5.2

The Manhari Metals quality, OHS and environmental policies, as laid out above in this document, is regarded by Top Management as the company mission. Furthermore, Manhari Metals is a non-smoking establishment.

The policy is communicated with every worker to enable all business decisions to be assessed against the HSEQ Quality, Environment and Safety Policy to ensure that good quality practice is carried out at all levels within Manhari Metals. A copy is provided to all workers and contractors upon initial engagement and immediately thereafter when modifications or amendments are made to subsequent versions of the HSEQ Manual.

The Quality, Environment and Safety Policy shall reflect ***industry best practice*** as far as can be ascertained from information available in the public domain.

Appropriate measurable objectives are set as per reference to ***Quality Objective 5.4.1*** of this HSEQ manual.

Manhari Metals work instructions shall be developed for key activities. The decision as to the need for work instructions lies with top management. In certain field operations, a question might arise as to whether the work instructions provided completely cover all aspects of the operations. When determining this need, personnel must consider the following:

1. What is the risk if the process is varied or not followed?
2. Do staff members need specific qualifications or training to complete this process? If so, is this training provided adequately?
3. Does any equipment used pose a threat to the staff, the environment or performance?
4. Do specific characteristics/specifications need to be documented?
5. What will be the effect if the process changes?
6. Is there a regulatory requirement for reporting, permissions or documentation?

Where any doubt exists, the HSEQ Manual shall be followed and a site JSA assessment shall be completed, considering and complying with points a) to f) above before any work is commenced.

Human resources 7.1.2

The HSEQ Manual shall have and maintain a register of all staff training competencies reviewed annually with a skills – training needs assessment of each staff member reviewed annually. Whilst Manhari Metals is a small organisation and all staff are intimately known to top management, compliance with this clause is critical to the HSEQ Manual quality principles.

Environment for the operation of the processes 7.1.4

Work instructions contain directions for all staff to operate within which include specific conditions about when it is or is not safe to operate. Any staff member can stop the job at any time that person feels that the safety or product being delivered cannot be sufficiently undertaken in accordance with the HSEQ Manual.

Monitoring and Measuring Resources 7.1.5

The only measurement equipment used by Manhari Metals is the weighing machines, which is calibrated on a regular basis.

Requirements for products and services 8.2

Prior to tendering, Manhari Metals shall determine and review all requirements related to tendering where tenders are sought. A record of all such reviews shall be maintained. It is noted that very few (if any) tenders are usually sought by the company due to the type and nature of the work being undertaken, however where such tenders are sought the review shall be conducted and due records shall be kept.

Customer complaints shall be immediately attended to and dealt with by top management and the customer complaint form completed with corrective actions and communicated to all staff as a matter of priority.

**Control of externally provided processes, products and service** **8.4**

Manhari Metals shall only purchase product which meets relevant Australian Standards.

General 8.4.1

As the majority of our services are related to physical outcomes, our use of suppliers is conditional on purchasing products which are identified by compliant marks less than through suppliers. All products are sought which comply to AS/NZS, CE, DIN, ASME, ASNI, DOT, BS, ICC or other recognised standards.

Type & Extent of Control 8.4.2

Manhari Metals as a service provider have a very limited need to inspect or verify product and therefore does not engage in inspection processes. Manhari evaluates on a regular basis its key suppliers.

Information for External Providers 8.4.3

Manhari Metals shall record all purchases and retain copies of all manuals with details of compliance standards identifying the specifications of the product.

PRODUCTION AND SERVICE PROVISION 8.5

Control of Product and Service Provision 8.5.1

Manhari Metals utilises management review of all actions prior to commencement to ensure quality in the service it delivers. Management review follows risk management, risk management reviews and site inspections as a process for providing controlled processes for planning and production.

Manhari Metals through direct contact with clients meets the requirement for validation of process.

Identification and Traceability 8.5.2

All products are identified where appropriate.

Performance and Evaluation 9.1.1

Manhari Metals plans and implements monitoring and measurement and improvement of its processes to ensure customer satisfaction, conformity with the HSEQ plan and continual improvement.

Customer Satisfaction 9.1.2

Customer satisfaction is critical to Manhari Metals’ mission and as such uses a range of top measurement processes including periodical reviews and contractor performance reports to ensure compliance.

Analysis and Evaluation 9.1.3

Manhari Metals has records from delivery of service to the customer and customer satisfaction forms. These are reviewed periodically and form a part of top management review agenda.

Clause 9.2 Internal Audit

Manhari Metals is undertaking a range of internal audits and also uses external auditors to identify conformance and opportunities to meet the goal of best practice. Please note the annual audit plan shall be developed.

Please also note the audit procedure and corrective actions process, including detected non conformities verification and responsibility.

Management Review 9.3

Management shall review the HSEQ Manual annually with minuted notes, considering –

1. All customer feedback documentation;
2. All incident reports;
3. Inputs from internal audits; (where conducted)
4. Inputs from external consultants;
5. Industry best practice; and

Any other available information including staff feedback.

Improvement 10.0

Manhari Metals has periodic and annual processes in place to continually improve the effectiveness of the HSEQ system.

Non- Conformity and Corrective Action 10.2

Processes and procedures are ensconced in the HSEQ manual to ensure nonconformities and potential non-conformities are managed.

All relevant and applicable ISO 45001, ISO9001:2015 and ISO14001 elements are complied with.

# WORKPLACE HEALTH AND SAFETY RESPONSIBILITIES

Manhari Metals’ Responsibilities

Manhari Metals has a duty to ensure, so far as reasonably practicable, the health and safety at work of all its workers. It is responsible for:

* Providing and maintaining its workplaces in a healthy and safe condition and providing safe systems of work
* Identifying, controlling and monitoring hazards in the workplace
* Ensuring the safe use, handling, storage and transportation of plant, equipment and substances
* Providing and maintaining systems of work and a working environment that is healthy and safe
* Providing the information, training, instruction and supervision necessary to maintain a healthy and safe workplace
* Providing adequate facilities for the welfare of workers
* Monitoring the workplace and the health and safety of workers to assist in preventing injury and illness.

Managing Director

* Formally approve the Occupational Health and Safety Policy.
* Assign custody to ensure procedure is maintained and updated.
* Formally approve the Occupational Health and Safety Procedures.
* Review overall organisational health and safety performance.
* Participate where required in the resolution of safety issues.
* Review serious injuries/incidents and monitor corrective actions.
* Review health and safety performance of middle management.
* Ensure organisational compliance with health and safety legislation.

Supervisors

* Implement the OHS Policy, OHS Procedures and legislative requirements.
* Monitor health and safety performance within area of responsibility.
* Demonstrate commitment to health and safety through participation in formal and informal discussions, workplace visits and hazard inspections, etc.
* Participate, where required, in the resolution of safety issues.
* Investigate all injuries/incidents within area of responsibility.
* Ensure liaison with employees, particularly on any workplace changes which have a health and safety component.
* Initiate actions to improve health and safety within area of responsibility.
* Actively monitor the workplace to determine presence of hazards and take appropriate action to rectify any hazards found.
* Participate in consultation.
* Ensure all employees are inducted and receive regular training as required to perform jobs safely.
* Facilitate rehabilitation of injured employees.

Duty of Officers

* If an employer has a duty or obligation under the Act, an officer of the employer must exercise due diligence to ensure that the employer complies with that duty or obligation.

Managers/Supervisors Responsibilities

* maintaining a working environment that is safe and without risk to health
* implementing safe systems of work by ensuring safe products and systems are used
* maintaining the workplace, plant, machinery, and substances
* implementing the information, training, instruction, and supervision for workers
* identifying and controlling hazards in the workplace
* ensuring all relevant health and safety laws are complied with
* using the resources provided for health and safety
* ensuring workplace rules, procedures and systems are reviewed and maintained
* promoting health and safety in the workplace
* maintaining consultative mechanisms.

Worker’s Responsibilities

* ensuring they are not under the influence of alcohol, drugs or medication of any kind where doing so could adversely affect their ability to perform their duties safely or efficiently or be in breach of the workplace policies
* taking reasonable care for the health and safety of themselves and others who may be affected by their actions or omissions in the workplace
* co-operating with management to ensure all health and safety obligations are complied with
* ensuring all health and safety equipment is used correctly
* using and maintaining the required Personal Protective Equipment (**PPE**)
* reporting any incidents or injuries sustained while working and seeking appropriate first aid
* advise management as soon as practicable, of any symptoms that may lead to adverse health issues arising from prolonged and/or repetitive work activities
* reporting any unsafe conditions, equipment or practices to management, as soon as practicable
* rectifying minor health and safety issues where authorised and safe to do so
* co-operating with any health and safety initiative, inspection or investigation
* actively participating in any return to work program.
* Adhere to all safe working procedures in accordance with instructions.
* Take reasonable care of themselves and others who may be affected by their actions.
* Participate in all training as requested.
* Participate in the consultation process.

Other Persons at the Workplace Will:

* Take reasonable care for his or her own health and safety; and
* Take reasonable care that his or her acts or omissions do not adversely affect the health and safety of other persons; and
* Comply, so far as the person is reasonably able, with any reasonable instruction that is given by the employer to allow the employer to comply with this Act.

Compliance Manager

* Monitor the implementation of the HSEQ system.
* Reporting on the performance of the HSEQ management system to top management
* Educate top management about the environmental and OHS legal requirements and duty of care
* Familiarise themselves with current environmental initiatives and procedures (e.g. energy saving best practice, recycling, waste disposal)
* Ensure that energy and water bills are obtained and kept the Performance Spreadsheet is updated regularly.
* Report relevant energy and water use performance.
* Ensure that the relevant work instructions are implemented.
* Ensure that waste disposal and paper usage performance is reported.
* Ensure that the relevant work instructions are implemented.

# CONTEXT OF THE ORGANISATION

The context of Manhari Metals is influenced by the ability of the business to provide consistent products and services that meet applicable statutory and regulatory requirements. This is done by;

1. Determining both external and internal issues that are relevant to the organization’s mission and vision and to the intended results of our IMS.
2. Determining and understating the needs and expectation of interested parties

The relevant issues of the organisation and the needs and expectations of interested parties are determined and recorded through the stakeholder register, SWOT Analysis register and the risk register respectively. Manhari Recycling is able to control and influence all sub contracted activities to comply to the IMS requirements.

Understanding the Context of the Organisation

Manhari Metals will identify all the internal and external issues related to its processes, products and services. SWOT analysis is used to identify the internal and external issues of the organisation. The SWOT analysis will be reviewed during the management review meetings and as when it is needed to ensure its relevance and adequacy. The following (but not limited to) constitutes the internal and external issues of the organisation:

Internal

* MANHARI RECYCLING’s values.
* The values of the community.
* Our understanding of the cultural diversity and knowledge of our workers.
* How MANHARI RECYCLING is performing.

External

* Legal requirements and obligations, local, State and Federal.
* Technology options.
* Our competitors.
* The market we operate in.
* The cultural, social and economic environment in which our customers and we operate

Understanding the Needs and Expectations of Interested Parties

Manhari Recycling understands the needs and requirements of our staff, contractors, existing clients, future clients, communities and authorities. Our company continues to determine the needs and expectations of all persons we deal with to ensure a lasting relationship. We use the stakeholder register to determine the needs and expectations of the interested parties. This register is reviewed during the management review meeting.

# PURCHASING

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **PURPOSE:** | | To define the controls to ensure that all purchased products meet the necessary standards to enable Manhari recycling to supply and install products to the required specifications, including the processes for: engaging and evaluating the external provider; purchase order authorisation; and verification of purchased product. | | |
| **SCOPE:** | | Applicable to all suppliers and service providers supplied to Manhari Recycling. | | |
| **STEPS IN THE PROCEDURE** | | | **RESPONSIBILITY** | **RECORDS** |
| **Selection and Approval of Suppliers** | | | | |
| 1 | Key suppliers are general public, industrial sites (where bins are hired to them) or vehicle wreckers and suppliers or plant and equipment.  Service providers to office such as IT and cleaning service. | | * N/A | * N/A |
| 2 | Suppliers of scrap metals can be general public or a business. There are no criteria in place to select the general public (i.e. the business is open to general public). As for businesses, the key criteria for selecting suppliers are   1. If it’s a business, ensure they have a valid ABN number 2. Bank details.   The list of all suppliers are maintained in Myyard.net | | Procurement Manager | Myyard.net  Supplier Set Up Form |
| 3 | Selection criteria for **plant and equipment**. Typically very specialised equipment. Hire a consultant to assist the company in selecting the best suitable supplier.  Key criteria:   * Experience in servicing Australian customer/market * Downtime and availability of remote service (suppliers are generally in Europe) * Financial terms and cost * Quality, environmental and OHS certification   The list of suppliers and maintenance providers of Plant and Equipment is maintained in the Approved Supplier List | | * Procurement Manager and BDM | Supplier Approval & Evaluation Checklist  OHS Purchasing Checklist  Approved Supplier and Service Provider List |
| **Procurement information** | | | | |
| 4 | Suppliers of Scrap metals:  Information is agreed and documented in myyard.net with the suppliers. | | * Procurement Manager | Myyard.net |
| 5 | Suppliers of Plant and Equipment including maintenance suppliers  Clear description   * Plant and Equipment * Service providers (maintenance of machines | | * Procurement Manager and/or BDM | PO / Contract |
| **Ongoing evaluation** | | | | |
| 6 | Evaluate key suppliers on an ongoing basis as per the criteria specified in the Supplier Evaluation Checklist. The procurement manager decides the key suppliers. | | * Procurement Manager | Supplier Evaluation Checklist |
| 7 | The outcome of the evaluation would be either:   * Continue relationship with the supplier * Provide feedback to improve service * Discontinue working with the supplier | |  | Supplier evaluation checklist |

# BIN DELIVERY & PICKUP

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| --- | --- | --- | --- | --- |
| **PURPOSE:** | | To define the controls to ensure that all bins that are delivered to customer sites and have been picked up are appropriately tracked. | | |
| **SCOPE:** | | Applicable to all customers where Manhari Metals performs the transport of scrap steel from the customers site to Manhari’s receival facility. | | |
| **STEPS IN THE PROCEDURE** | | | **RESPONSIBILITY** | **RECORDS** |
| Selection of Suitable Bin | | | | |
| 1 | Bin size is determined by the procurement managers during discussions with the customers about their requirements. Information of bin requirements sent to Logistics Manager. | | * Procurement Manager | N/A |
| 2 | Bin size will be communicated to drivers by Logistics Manager via daily run sheet that is accessed via smart phone. | | * Logistics Manager | Runs Sheet |
| 3 | Delivery location and access information to be determined by procurement manager. Factors to be considered include, but not limited to:   * Access times * Location for bin drop off * Surface condition on site * Overhead electrical wires or other infrastructure | | * Procurement Manager | N/A |
| 4 | Information to be sent to Logistics Manager, who will communicate with drivers via daily run sheet that is accessed via smart phone. | | * Logistics Manager | Run Sheet |
| Drop off of bin to customer site | | | | |
| 5 | At the time of delivering a bin to the customer site, driver records relevant information on Delivery Docket and has the docket signed by the customer. | | * Driver | Delivery Docket |
| 6 | Driver records relevant information on their job sheet, which they sign off at the end of the day. | | * Driver | Job Sheet |
| Pick up of Bin | | | | |
| 7 | At the time of picking up a full bin from the customer site, the driver records relevant information of Delivery Docket and has the docket signed by the customer. | | * Driver | Delivery Docket |
| 8 | Driver records relevant information on their job sheet, which they sign off at the end of the day. | | * Driver | Job Sheet |

# EXPORTING (SALES)

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| --- | --- | --- | --- | --- | --- |
| **PURPOSE:** | | To define the sales (exporting process) | | | |
| **SCOPE:** | | Exported segregated material to overseas by Manhari Recycling | | | |
| **STEPS IN THE PROCEDURE** | | | **REFERENCES** | **RESPONSIBILITY** | **RECORDS** |
| 1 | We get approached by nearly 20-25 customers a day but the most important factors which weigh in the most to identify a potential customer is either the customer itself is a big manufacturing business who is trying to procure good quality raw material directly from the supplier or the customer is a renowned trading company with good connections to manufacturing giants across the globe.  Other important factors are payment terms, reliability, quantity, product availability. | | N/A | * Export Manager | N/A |
| 2 | The very first step of the process is negotiation. The proposal / contract prepared by Manhari will be reviewed by relevant parties including BDM, Export Manager and Logistics Manager to confirm the Manhari is capable of delivering the service. | | N/A | * Export Manager | Contract review |
| 3 | Once both parties reach an agreement. A formal sales contract is drafted and signed on by both parties which covers all the details pertaining to the sales and purchase of goods.  Depending upon the shipping terms in the contract a booking is placed.  Upon receiving the booking confirmation, our independent transport company collects empty containers from the allotted container park which are then dropped off to as required. Containers are then prepared for loading and packed with the required material. Once containers are loaded, the transport company then collects the packed containers from our yard and delivers it to the port for it to be loaded on to the intended vessel as per the booking.  Once all the containers are on board the vessel, an invoice for payment is raised as per the terms agreed in the sales contract. | | N/A | * Export Manager | * Contract |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Inspection of container loading** | | | | |
| 4 | The loading of cargo in shipping containers for sale is documented in the following series of photos:   1. Empty container 2. 25% loaded 3. 50% loaded 4. 75% loaded 5. Fully loaded container 6. 1 door closed showing the fully loaded container and the container number 7. Both doors closed and sealed 8. Close up of the seal clearly showing the seal number | N/A | * Operator loading container | * Dropbox |
| **Customer satisfaction** | | | | |
| 5 | Once a year a customer satisfaction survey | Myyard.net | Export Manager | Customer Satisfaction Survey |
| **Customer complaints** | | | | |
| 6 | Add all received complaints to the Action Plan Register | Complaints / Emails | * Export Manager | * Action Plan Register |
| 7 | Decide in consultation with the Compliance Manager about the correction and record in the Action Plan Register. Evaluate the need for root cause analysis and corrective action. | Complaints / Emails | * Export Manager | * Action Plan Register |
| 8 | Keep the client up to date with the correction and corrective taken | Complaints / Emails | * Export Manager | * Action Plan Register |
| 9 | Follow up, close out and obtain feedback from client | Complaints / Emails | * Export Manager | * Action Plan Register |

# CONSULTATION

Consultation Statement

Manhari Metals is committed to protecting the health and safety of all its workers. Injury and illness are needless, costly and preventable.

Manhari Metals will consult with workers regarding the implementation of practices and systems that will ensure the health and safety of workers. Worker involvement at all levels is essential for ensuring a healthy and safe workplace.

Manhari Metals’ health and safety consultation arrangements fall into the generic category of 'Agreed Arrangements’.

The primary medium for consultation is direct dialogue between management and workers. Consultation at this level is fundamental to the successful management of health and safety risks.

Consultation on health and safety issues must be meaningful and effective to allow each worker to contribute to decisions that may affect their health and safety at work.

All workers will be given the opportunity to express their views and contribute in a timely manner to the resolution of health and safety issues that affect them. These views will be valued and taken into account by those making decisions.

The consultation arrangements at Manhari Metals will be monitored and reviewed as the need arises to ensure they continue to be meaningful and effective.

Manhari Metals’ Responsibilities

Consult with workers in relation to:

* identifying or assessing hazards or risks
* making decisions on how to control risks (risk assessment)
* making decisions about the adequacy of facilities for employee welfare (such as dining facilities, change rooms, toilets or first aid)
* making decisions about procedures to:
* resolve health and safety issues
* consult with employees on health and safety
* monitor employees’ health, workplace conditions and
* provide relevant information or training regarding these decisions
* proposing changes that may affect employees’ health and safety, such as:
* changes to the workplace
* plant
* substances
* or other equipment used in the workplace
* the type of work performed.
  + doing any other thing prescribed by the Regulations.
  + Audit plan and findings (both internal and external audit).
  + Non-conformance handling and corrective action.

Consultation Process

Toolbox Meetings

Manhari Metals recognises the involvement of workers as essential in identifying potential hazards that can be eliminated, or minimised, before injuries occur. To facilitate this, Manhari Metals will make health and safety an agenda item at regular staff meetings. Staff/team meetings will be used to:

* notify and remind workers of health and safety policies and procedures
* provide a forum for workers to have their say about health and safety issues
* maintain awareness of health and safety.

Where required, specific health and safety issues will be raised, incidents and accidents reviewed, procedures developed and communicated, and health and safety alerts discussed.

Meetings will be used to induct workers into new or amended health and safety procedures and ‘sign off’ their understanding of the controls provided for the specific work in which they will be involved.

If a worker is absent from a staff meeting, the worker will be provided with any relevant information and training upon their return to work.

**Toolbox Meeting Record** shall be kept for each toolbox.

Noticeboards

A health and safety noticeboard will be positioned in a conspicuous place in the workplace. The noticeboard will display the following:

* Manhari Metals’ Health and Safety Policy
* information regarding Manhari Metals’ **Injury Management and Return-to-Work** program,which should be reviewed and amended in line with any specific requirements of your workers compensation insurer
* the **If you are injured at work poster** complete with details of your workers compensation insurer
* copies of the Manhari Metals’ **Incident Report Form and Hazard Report Form**
* Manhari Metals’ agreed Safety Consultation Statement outlining the agreed arrangements for reporting and managing safety issues
* a list of designated first aid personnel and their contact details
* a list of emergency wardens.

In addition, minutes of the most recent staff meeting should be displayed on the noticeboard.

Participation

The communication methods above allow employees at Manhari to discuss health, safety, environmental and quality issues relevant to their work with the management team. Employee participation is a key element of a Integrated Management System.

Manhari will consult with and expect its employee’s participation on matters concerning (but not limited) to the following areas:

* Work situations and workplace related risks and hazards
* Incident and risk reporting
* Issue resolution
* Areas with potential to cause injury or harm
* Suggestion related to IMS
* Any changes needed to the IMS.

Manhari will draw on the knowledge of its experienced employees when making informed decisions about workplace safety.

# SAFE SYSTEM OF WORK

Purpose

This Safe System of Work (SSOW) refers to the framework ongoing implementation of the management of Manhari Metals’ operations to ensure the safety of all personnel when performing their day to day operations.

Responsibilities

Management

It is the responsibility that management:

* Have ensured all tasks performed by Manhari personnel have been risk managed to ensure, as best as practicable possible, risks have been identified and, as a preference, eliminated, or if elimination is not possible, than reduced to an acceptable level.
* Have provided relevant and adequate training to workers to enable them to perform the tasks required of them in a safe and efficient manner.
* Monitor the workforce to ensure they are performing their tasks in accordance with their training.

Employees

It is the responsibility of employees to:

* Ensure they do not perform any task unless they have first completed training in the safe operation of the task
* Perform their tasks as per their training.
* Report any non-adherence to protocols to their supervisor as soon as is reasonably practicable.

Procedure

Forward Planning

For any task or operation that occurs within the Manhari Metals businesses, a risk assessment is to be performed to determine if the activity is high risk.

Activities that are determined to be high risk must then have a Safe Work Method Statement prepared for the activity. Where multiple specific tasks fall under a single SWMS, a Safe Work Procedure is to be developed.

Training

The SWMS and SWP’s that have been developed are to become the Standard Operating Procedure for any given task. Any employee that is to perform a role or task at Manhri Metals are to receive training in the task by revieing the relevant SWMS/SWP and to signoff that they have received the training and understand the risks associated with the task and the controls that have been put into place to mitigate against the risks.

The controls will include the minimum PPE requirement to perform the task.

Review

All SWMS/SWP’s are to be reviewed to ensure their effectiveness and relevance. This is to be performed annually at a minimum, but should also be reviewed if:

* Any changes in the environment or circumstances to the task arise.
* In the event of a near miss or incident.
* At the request of an employee who suggests an improvement or highlights a risk that has not been previously considered.

# RISK MANAGEMENT PROCESS

Risk management is the key process in ensuring a safe and healthy workplace. In health and safety terms, risk management is the process of identifying situations which have the potential to cause harm to people or property, and then taking appropriate steps to prevent the hazardous situation occurring or reduce the risk of injury to workers.

Manhari Metals has a duty to undertake risk management activities to ensure the health and safety of its workers, contractors, visitors and others in the workplace. Manhari Metals will as far as is reasonably practicable, ensure that the workplace is free from hazards that could cause injury or illness.

Control of hazards takes a variety of forms depending on the nature of the hazard and must be based on the hierarchy of control options emphasising the elimination of the hazard at its source.

The Risk Management Process

The risk management process consists of four well-defined steps. These are as follows:

**Step 1:** *Identifying -* Identifying the problem, this is known as hazard identification

**Step 2:** *Assessing -* Determining how serious a problem it is, the likelihood of an incident/accident occurring and the consequence and potential severity, this is known as risk assessment

**Step 3:** *Controlling* - Deciding what needs to be done to solve the problem, this is known as risk elimination or control

**Step 4:** *Monitoring and Review –* This involves reviewing the actions taken to determine the effectiveness of the controls implemented.

Hazard Identification

Hazard identification aims to determine what hazards exist (or could foreseeably exist), so that control measures can be implemented to address the hazard before it causes any harm.

Hazard identification activities will include:

* Conducting workplace inspections to identify hazards
* Regular work area observations and discussions with workers
* Identifying and assessing hazards on an ongoing basis
* Assessing products and services prior to purchasing to identify potential risks
* Undertaking incident and injury investigations and reviewing past incident and accidents data
* Talking to workers performing the task to find out what they consider as safety issues
* Reviewing any information already available, for example safety data sheets, manufacturer’s specifications and instructions and safe operating procedure to see what hazards have already been identified and how these are controlled
* Thinking creatively about what could happen if something went wrong.

Identified hazards will be recorded on a Hazard Report Form or **Risk Register** which will be used in conjunction with the monitoring and review of identified hazards and implemented controls.

Risk Assessment

Once a hazard has been identified, Manhari Metals, in consultation with workers, will conduct a Risk Assessment to determine how likely it is that someone could be harmed by the hazard and how serious the injury or illness could be. The risk assessment will be recorded on the **Risk Register** or **Generic Risk Assessment Form**.

If a hazard is obvious and the risk of injury or illness is high, action will be taken immediately to control the risk, even if only as an interim measure. Where a control is implemented as an interim measure, a thorough risk assessment will be conducted to decide on more permanent control measures.

When assessing the risk of injury or illness the following information regarding the hazard will be reviewed where relevant:

* Any hazard information supplied with a product or substance such as safety data sheets
* Workers experience with similar hazards or from incident/injury data
* Guidance materials available from government health and safety bodies/regulators in relation to particular hazards, processes or work tasks
* Industry codes of practice
* Relevant Australian Standards
* The working environment, including the layout and condition of the premises and equipment and the materials used in the workplace
* The capability, skill, experience, and age of people ordinarily undertaking the work
* The training, supervision and work procedures being used
* Any reasonably foreseeable changes in the working conditions and environment

Once the above information has been considered, an initial risk ranking can be applied to the hazard to enable Manhari Metals to set priorities for control measures. The Risk Ranking Matrix is used to provide a priority list for control actions. The Initial Risk Ranking is recorded for each hazard on the **Generic** **Risk Assessment Form.**

Identified risks and any control measures implemented should be recorded on a **Risk Register** which will be used to assist in the monitoring and review process.

Risk assessments undertaken for specific tasks/items will be recorded on the **Generic** **Risk Assessment Form**.

Hazard Elimination or Risk Control

Once the hazards in the workplace have been identified and assessed, priorities will be set determining what action is to be taken to eliminate or control the hazard. Control of risk takes a variety of forms depending on the nature of the hazard and should be based on the ‘hierarchy of control’ options emphasising the elimination of the hazard at its source, or if this is not reasonably practicable, then reducing the risks to the worker. The hierarchy of control measures will be applied when determining control measures for each identified hazard in the workplace.

Where a hazard is identified, Manhari Metals will use the below hierarchy to determine the most effective and appropriate control measure:

* **Level 1** controls provide the highest level of health and safety protection and are the most reliable in preventing harm. They involve eliminating the hazard from the workplace, for example, by bringing a job to ground level to eliminate the need to work at heights
* **Level 2** controls provide a medium level of health and safety protection, and as such will only be used if a Level 1 control is not reasonably practicable. Level 2 controls may involve:
  + substituting (either wholly or partly) the hazard from the workplace with something that presents a lesser risk. For example, substituting a non-toxic, organic cleaner for a toxic cleaner
  + isolating the hazard so that no worker is exposed to it. For example, removing power or energy from a malfunctioning piece of equipment, or blocking access to an area of the workplace deemed hazardous
  + implementing engineering solutions that reduce the risk of the hazard impacting the worker. For example, erecting a guard or barrier to prevent a worker from reaching into machinery whilst it is operating
* **Level 3** controls provide the lowest level of health and safety protection, and as such will only be used if a Level 1 or Level 2 control is not reasonably practicable. These controls will be used in conjunction with a Level 2 control to reduce the risk to an acceptable level. This may involve:
  + implementing administrative controls to reduce the exposure of workers to the remaining risk. For example, training everyone to work safely, writing a safe work method statement, rotating the work or managing the time workers are exposed to the risk
  + providing PPE in conjunction with other Level 2 and Level 3 controls.

Agreed control measures should not introduce any new hazards or risks to the workplace. The implemented controls are recorded in the **Risk Register** and on the **Generic** **Risk Assessment** **Form** for individual tasks and items. Annual review of control measures must be undertaken to determine their suitability and effectiveness.

# SAFE WORK METHOD STATEMENT PROCEDURES

Purpose

The propose of Manhari Metals’ safe work method statement (SWMS) is to ensure that the Directors and workers comply with legislative requirements and adhere to its Work and Safety standards.

Scope

This procedure covers all Manhari Metals workplaces and includes:

* Manhari Metals’ workers, such as workers, contractors or subcontractors, a worker of a contractor or subcontractor, labour hire, apprentices, trainees, work experience students and volunteers.
* Other duty holders who carry out work for Manhari Metals or who are likely to be directly affected by a Manhari Metals -related work health or safety issue.

Risk/Hazard Management

A SWMS is a documented list of the steps for a task/activity and provides workers and others with a system for doing their work safely. The implementation of the SWMS relies on the individual to follow the requirements as set out in the document. Therefore, a procedure can be regarded as an administrative control type and should only be adopted once all other types of controls, such as elimination, substitution, isolation and engineering, have been considered.

A SWMS should be developed, once it is identified as:

* An action arising from an incident investigation or hazard report, and/or;
* A control measure in a risk assessment.

NOTE: High Risk Construction Work

A SWMS must be prepared for high risk construction BEFORE work commences and as all Manhari’s works are High Risk a SWMS is to be fill out before every job/task.

The SWMS must consider all circumstances that may affect the way in which the high-risk construction work is carried out and also the WHS management plan, if conducted as part of a project. Those responsible for the work site must ensure that high risk construction work is carried out in accordance with the SWMS for the work.

If any person finds that high risk work is not being carried out as per the SWMS, then that person must:

1. Stop the work immediately or as soon as it is safe to do so, and
2. Resume work only in accordance with the SWMS

Development

SWMS should be developed in consultation and cooperation with the workers undertaking the activity. Consultation and cooperation will also ensure that hazards and controls are appropriately identified. Toolbox Talks shall assist, where practical, in the development of the SWMS When developing a SWMS that involves hazardous substances or a traffic control plan, the Safety Data Sheet (SDS) and Traffic Control Plan TCP) must be attached to the SWMS

The following steps should be followed to ensure that a proper SWMS is developed:

* Observe the task/activities: Although workers might have knowledge/understanding of the task/activity, it is important to observe the task/activity being performed the preferred way, to ensure the safest method is documented.
* Review associated legislative requirements: Some task/activities are governed by legislative requirements. These must be considered when developing a SWMS to ensure any legal requirements are included. If the task/activity uses any hazardous substance/s or dangerous good/s the SWMS must reference the Safety Data Sheets (SDS) for each hazardous substance or dangerous good.
* Record the sequence of basic job steps: Assemble the steps involved in the activity and then write down the ones that make up the task/activity.
* Record potential hazards of each step: Next to each step identify what may have potential to cause injury or illness (to those doing the work or to anyone else nearby), damage to the environment, property, plant or equipment.
* Identify ways of eliminating and controlling the hazards: For each identified hazard, list the measures that need to be put in place to eliminate or control any likely risk occurring.
* Test the procedure: Observe the workers or others following the SWMS and adjust the procedure as necessary.
* Monitor and review: Make sure the activity is supervised to ensure the documented process is being followed.

Implementation, Accessibility and Display

Once the SWMS has been approved it is then implemented and available for use.

All workers will be inducted and must sign the SWMS before commencing work. The finalised copy must be kept within the workplace and be available for use. A copy should be with Manhari Metals staff at all times when undertaking the activities described in the SWMS.

SWMS should be physically displayed prominently or readily available in the areas in which they are to be used.

Review of SWMS

SWMS shall be regularly reviewed to make sure they remain effective. You must review your control measures and, if necessary, revise them:

* After an incident or near-miss (control measure was not effective in controlling the risk)
* If there is a change of supervisors, workers, designers or engineers
* If the task/activity changes
* When a new hazard or risk is identified
* If the results of consultation indicate that a review is necessary, or if a health and safety representative requests a review
* Where a known risk exists (such as industry incidents like utility strikes, plant rollover etc)
* Where the equipment or plant used in the SWMS changes
* If there is a change to legislation, standards or codes of practice

Manhari SWMS are reviewed annually through a management review and in consultation with Manhari workers.

# INDUCTION, TRAINING AND AWARENESS

Introduction

Manhari Metals will provide the necessary health and safety training to ensure that work can be performed in a healthy and safe manner in the workplace.

Training will focus on the hazards and risks associated with the work, along with the control measures required to ensure the health and safety of the workers.

Manhari Metals will ensure that no worker will commence work where they may be exposed to a hazard/s without having received the appropriate level of induction and/or training and instruction to complete the tasks safely.

Aims of HSEQ Training

HSEQ training is conducted to ensure that:

* Appropriate information, instruction, training and supervision is provided to all workers
* Competencies for all workers are identified and reviewed and the appropriate training provided
* Competencies of contractors, labour hire workers, volunteers and visitors are assessed prior to engagement
* Workers receive training in appropriate to their position and tasks (including re-training where necessary).

Records of training conducted will be retained by Manhari Metals.

A record of training will be kept using the **Skills Matrix** form, detailing when a worker was trained, and if required, when the skill expires and retraining is required. For example, CPR refresher training is required every year and first aid training is required every three years.

Induction

Visitors shall be inducted and sign on the visitor book. They shall always be escorted by Manhari Metals personnel.

Employees shall be inducted using the **Induction Checklist for Employees**

Contractors shall be inducted using the **Induction Checklist for Contractors.**

# INCIDENT AND INJURY REPORTING

Objective

Manhari Metals has an active reporting, recording, investigation and corrective action process. The terms of incidents and injuries in this context includes all “near miss” or “near hit” events, work-related illnesses and injury, events that harmed or might have harmed, any employee during the course of their work.

System for Reporting, Recording and Analysing Incidents, Injuries and Work-related Illness

Manhari Metals has a documented procedure for reporting, recording and analysing incidents, injuries and work-related illnesses. When someone is injured at work and the injury meets a certain criteria (see below), we are required by law to notify WorkSafe. This notification must be made immediately on 132 360, followed up by written notification within 48 hours and in some cases we will be directed by WorkSafe not to disturb the incident scene until an Inspector can come and look at it.

The **Incident Report** is to be completed by the employee or the immediate supervisor within 24 hours of the injury or incident according to the following guidelines:

* All injuries in the workplace must be reported to management.
* **Near Miss** incidents where a person could have been injured or equipment could have been damaged must be reported.
* It is the responsibility of each supervisor to ensure the completed **Incident Report** is sent to the location indicated on the form within 24 hours of the time of the injury or incident.
* On receipt of an **Incident Report**, the Manager shall immediately arrange for an investigation to be commenced.
* For all injuries and incidents, an **Incident Report** is to be completed by the Manager (or person designated by the Manager) in conjunction with the employee involved.
* Training in the incident investigation process is provided to all employees.
* The report is to be completed within 24 hours of the incident and forwarded to the Compliance Manager.
* Each investigation should have attached to it a copy of the Injury/Incident Report. All Workcover or Employees compensation agent/insurer claims must have an incident investigation report completed.

Employee Specific Responsibilities to Report Incidents, Injuries and Work-related Illness

Employees are responsible for reporting of all work-related injuries, illnesses, incidents where a person could have been injured, and equipment damaged. The employee or immediate supervisor must complete Incident/Injury Report within 2 hours of the injury or incident. It is the responsibility of the supervisor to ensure that the report is sent to the location indicated on the form within 24 hours of the time of the injury/incident.

Notification to the Statutory Authority when a Notifiable incident Occurs

Manhari Metals has a procedure to record in a register all incidents in the workplace. If the incident is a notifiable incident (see below), then Manhari Metals has a procedure to notify the Statutory Authority in accordance with their reporting requirements.

A written notice in the required form is to be provided to the Statutory Authority within the specified timeframe, or as soon as possible after Manhari Metalsis aware of the injury/incident.

Notifiable Incidents

There are three types of notifiable incidents, relating to:

* The death of a person;
* A serious injury or illness of a person;
* A dangerous incident.

Serious injury or illness

It means an injury or illness requiring the person to have:

1. immediate treatment as an in-patient in a hospital; or
2. immediate treatment for:
   1. the amputation of any part of their body;
   2. a serious head injury;
   3. a serious eye injury;
   4. a serious burn;
   5. the separation of their skin from underlying tissue (such as degloving or scalping);
   6. a spinal injury;
   7. the loss of a bodily function;
   8. serious lacerations; or
3. medical treatment within 48 hours of exposure to a substance.

It is important to note that the treatment under (b) and (c) does not have to be as an in-patient in a hospital.

Dangerous incident

Legislation defines a 'dangerous incident' as a workplace incident that exposes a worker (or any other person) to a serious risk to their health or safety, emanating from an immediate or imminent exposure to:

* An uncontrolled escape, spillage or leakage of a substance
* An uncontrolled implosion, explosion or fire
* An uncontrolled escape of gas or steam
* An uncontrolled escape of 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 must be authorised for use
* the collapse/partial collapse of a structure
* the collapse or failure of an excavation or of any shoring supporting an excavation
* the inrush of water, mud or gas in workings, an underground excavation or tunnel
* the interruption of the main system of ventilation in an underground excavation or tunnel.

Workplace Rehabilitation Process

Employees are responsible for obtaining appropriate medical treatment for an injury. For work related injuries, employees must get a Medical Certificate from their Treating Medical Practitioner. Employees must immediately report all injuries to the Supervisor. For work-related injuries, employees must complete an **Incident Report Form**. Employees must actively participate in Workplace Rehabilitation plans and return to work duties.

Depending on the work-related injury, compensatory benefits payable by WorkCover or the Employees compensation agent/insurer may include weekly compensation payments, medical, hospital and rehabilitation costs, reasonable travel expenses and lump sum payment for permanent impairment. Compensation is not payable for damage to clothing, jewellery or vehicles.

All WorkCover or Workers compensation agent/insurer forms are available from HR or directly from WorkCover or Workers compensation agent/insurer.

Procedure to Investigate Injuries, Incidents that Harmed or might Harm Employees

The investigation of incidents provides an opportunity to examine many aspects of our operations. The key to the investigation is to identify control measures that will prevent a recurrence of the same incident. The focus is to identify the deficiencies in the system and to make changes if necessary to prevent a recurrence.

The procedure starts with an investigating team nominated to conduct the investigation. Depending on the seriousness or the complexity of the incident, a senior member of management, a person with technical knowledge of the work and an OHS professional will be included in the team.

The main stages of the investigation are:

* Gather objective information and establish facts.
* Collect data that relates to environment and the human factors.
* Isolate the contributing factors.
* Determine corrective and preventative actions.
* Prepare a report (contain a proposed action plan for management consideration and implementation).

Procedure for Corrective Action to any Deficiencies Identified during an Investigation

Manhari Metals management will evaluate the action plan proposed by the investigating team before taking preventative and corrective action. Manhari Metals then either implements the corrective action provided by the investigating team or develops a system that will address the deficiency with the current system and prevents any future recurrence.

The new system will comply with the designated standards and OHS legislative requirements, and after implementation, will have an evaluation procedure to ensure its effectiveness.

On completion of the investigation, senior management will be provided with a copy of the report to ensure that any recommendation has been actioned.

Review Injury and Incident Data to Identify Trends and Provide Injury Prevention Initiative

Manhari Metalsregularly utilises the data from the incident/injury register to identify injury/incident gaps, trends and areas of opportunity for improvement. This will include developing corrective strategies, verifying the effectiveness of preventative or corrective actions and the development of objectives and targets for further improvements.

# RETURN TO WORK

Introduction

The following procedure articulates Manhari Metals commitment to preventing injury and illness by providing a safe and healthy working environment and providing opportunities for employees to participate in workplace rehabilitation to facilitate a timely and safe return to normal duties.

Workplace rehabilitation provides support to injured or ill employees, supervisors, managers and team members and is a positive strategy for retaining the job skills of staff members.

Definitions

**Injury** - A personal injury which includes, for example, a cut, fracture, sprain, strain, disease, aggravation of a pre-existing condition, industrial deafness, and psychiatric or psychological disorders.

**Injury Management/Return to Work plan** - A plan that covers the management of an employee’s injury and their return to work.

**Suitable Duties/Suitable Employment** - Matching pre-injury duties to recovering abilities on a temporary basis.

**Approved workplace rehabilitation Provider/ Accredited vocational rehabilitation provider –** offer specialized workplace rehabilitation services to help injured employees return to work.

Responsibilities

Employer Responsibilities

* Prevent injury and illness by providing a safe and healthy working environment
* Notify the required authorities/insurers of the work injury within the required time frame
* Participate in the development of an injury management/return to work plan and ensure that injury management commences as soon as possible after an employee is injured
* Support the injured employee and ensure that early return to work is a normal expectation
* Provide suitable duties for an injured employee as soon as possible
* Ensure that injured employees (and anyone representing them) are aware of their rights and responsibilities – including the right to choose their own doctor, and the responsibility to provide accurate information about the injury and its cause
* Consult with employees, doctors, rehabilitation providers, and, where applicable, unions to ensure that the return to work program operates as smoothly as possible
* Maintain the confidentiality of injured employee records
* An employer must not dismiss an employee as a result of a work related injury within the time frame set out in that State/Territories legislation.

Employees Responsibilities

* Take care to prevent work injuries to yourself and others
* Notify your employer of an injury as soon as possible
* Make a claim as soon as possible with the relevant authority/insurer
* Participate in developing and cooperate with your injury management/return to work plan
* Provide current medical certificates
* Provide accurate information about any aspect of your claim
* Notify the agent/insurer if you get a job or if you earn extra income from your job while you are receiving weekly benefits
* Attend medical and rehabilitation assessments
* Co-operate in workplace changes that will assist other injured employees.
* If an employee does not comply with the injury management plan, the agent/insurer may suspend benefits.

Employees Rights

* Nominate your own treating doctor who will be involved in your injury management plan
* If not provided by the insurer, choose your own approved workplace rehabilitation provider if necessary
* Be actively involved in the planning of your return to work.

Procedure

Notification of injuries

* Notify all injuries to the supervisor as soon as possible.
* Record all injuries using the Injury/Incident Report Form.
* Notify Workers compensation agent/insurer of all injuries within 48 hours.

Recovery

* Ensure that the injured employee receives appropriate first aid and/or medical treatment as soon as possible.
* Consult with the doctor nominated by the injured employee and who is responsible for the medical management of the injury and assist in planning return to work.

Return to work

* Arrange a suitable person to explain the return to work process to the injured employee.
* If not provided by the insurer, ensure that the injured employee is offered the assistance of an approved workplace rehabilitation provider if it becomes evident that they are not likely to resume their pre-injury duties, or cannot do so without changes to the workplace or work practices.
* Arrange for the employee’s early return to work (subject to medical and rehabilitation provider advice).

Suitable duties

* Develop an individual return to work plan when the employee according to medical advice, is capable of returning to work.
* Provide suitable duties that are consistent with medical advice and that are meaningful, productive and appropriate for the injured employee’s physical and psychological condition depending on the individual circumstances of the injured employee. Suitable duties may be:

1. at the same worksite or a different worksite
2. the same job with different hours or modified duties
3. a different job
4. full time or part time.

Dispute resolution

* Work together with the injured employee and where possible their union representative to resolve any disagreements about the return to work program or suitable duties
* If disagreements cannot be resolved between the employee and employer, involve other parties such as the employee’s treating doctor, the agent/insurer, an approved workplace rehabilitation provider or an injury management consultant.
* If this does not satisfactorily resolve the issue, contact the relevant State/Territory authority for advice.

For more information on Workers Compensation/Return to work, see the relevant State/Territory websites/legislation below: **Victoria** [www.worksafe.vic.gov](http://www.worksafe.vic.gov)

Workplace Injury, Rehabilitation and Compensation Act 2013

Audit Records

Incident report

Medical records

Suitable Duties plan

# HAZARD REPORTING

Purpose

This procedure describes how hazards are reported by employees. The Hazard Report applies to the reporting of any health and safety issues other than personal injury, (the Incident/Injury Report Form is to be used for this purpose). The procedure applies to all employees and contractors.

Definitions

**Hazard** - potential to cause injury or damage.

Procedure

1. Manhari Metals shall ensure that the **Hazard Report Form** is available to all employees in all work locations.
2. If there is an immediate risk of injury or illness an employee shall take action to make the area safe, ensuring their own safety is not jeopardised and immediately report the hazard to their supervisor.
3. Employees shall immediately report any hazard to their supervisor and complete the **Hazard Report Form**. The employee should keep a copy of the completed form.
4. The supervisor on receipt of the **Hazard Report Form** shall:
   1. take action to remove the hazard if possible
   2. take action to prevent employees being exposed to the hazard
   3. forward the Hazard Report to the Manager immediately on receiving the report.
5. Open hazard reports shall be discussed as part of the Toolbox Talks.
6. Copies of Hazard Reports are to be filed at each location under “Hazard Reports”.
7. The Manager will ensure that an explanation of this procedure is included in the induction for new employees and contractors.

Audit Records

Hazard Report Form

Toolbox talk record

# ISSUE RESOLUTION

Purpose

Management and employees of Manhari Metals have agreed upon the following issue resolution procedure. The agreed procedure aims to achieve the most efficient and effective resolution of all health and safety issues, as and when they arise. It is the responsibility of all management levels to resolve issues in their workplace. This procedure is applicable to all employees in the organisation.

Procedure

The agreed procedure is as follows:

1. The draft procedure (or draft HSEQ Manual) shall be discussed with employees and agreed upon.
2. Where an employee identifies a health and safety issue, they should raise it with their immediate supervisor. The employee or supervisor should inform the Managing Director.
3. The issue should be dealt with as soon as possible after being reported. If it cannot be rectified immediately then a solution should be implemented as soon as practicable. As a minimum, interim measures should be put in place to prevent any adverse consequences until such time that the issue can be satisfactorily resolved.
4. Where the issue concerns work which involves an immediate threat to the health and safety of any person, the Manager in consultation with the Managing Director may direct that work will cease. Where an issue or an immediate threat remains unresolved, the Managing Director or employees may request the assistance of WorkSafe Victoria. A WorkSafe Inspector may issue an Improvement Notice or a Prohibition Notice.
5. The issue and agreed outcomes should be tabled during the next toolbox talk meeting to notify all personnel of the issue and agreed control options. This communication should be formal using the *Hazard Report Form* as outlined in the Hazard Reporting Procedure.
6. Solutions should be recorded as well as communicated to relevant employees for their information.
7. Where relevant, the issue and control options should be documented in a hazard identification form by the Manager and distributed to all sites within the control of the company for tabling at safety meetings.

Audit Records

Hazard Report Form

Toolbox Talk Record

# FIRST AID

Introduction

First aid is the emergency care of sick or injured persons. Manhari Metals is committed to providing a first aid service which satisfies its obligations under applicable health and safety legislation.

Managers and Supervisors Responsibilities

* Ensure First Aiders are given appropriate training.
* Ensure they are available to perform first aid when required.

First Aider Responsibility

* Ensure their training is current and up to date.
* Advise the Supervisor of any injuries and status.
* Keep the first aid facilities up to date and clean

First Aid Kits

When considering how to provide first aid, Manhari Metals will consider all relevant matters including:

* The nature of the work being carried out in the workplace
* The nature of the hazards in the workplace
* The size, location and nature of the workplace
* The number and composition of workers in the workplace.

First aid kits provided in the workplace will:

* Be constructed of hardy material, and if appropriate, be capable of being locked (the key being easily accessible in cases of emergency)
* Be clearly and legibly marked on the outside with the words FIRST AID and a safety information sign complying with AS/NZS 1319
* Contain nothing except first aid equipment and resources in appropriate quantities
* Be audited on a regular basis and contents replenished as required
* Be kept clean.

The first aid kit will have attached to the inside of the lid:

* an inventory of the first aid equipment and resources which the kit is required to contain
* a notebook and pen for the purposes of recording information regarding treatment and usage
* cardio pulmonary resuscitation (CPR) flow chart
* a **Register of Injuries** form, or instructions on where to obtain the form.

Manhari Metals will nominate a person/s, who will be responsible for monitoring and maintaining the first aid kit. The nominated person will:

* undertake regular checks to ensure the kit contains a complete set of the required items
* ensure any items used are replaced as soon as practicable after use
* ensure that the contents are in good working order, have not deteriorated, are within their expiry date and sterile products are sealed and have not been tampered with
* maintain a record of first aid kit inspection details indicating the date of inspection and the person who undertook the inspection.

Register of Injuries and Treatment

Manhari Metals will provide and maintain a workplace **Register of Injuries**. Management will ensure the details of any workplace injury or illness are recorded on this register.

The register of injuries will:

* be kept in a readily accessible area of the workplace
* be made available for inspection when requested by an authorised inspector
* be kept for at least five years after the date of the last entry made in it.

Incident Response

Manhari Metals will take all steps necessary to provide emergency rescue and medical help to workers suffering a workplace related injury or illness.

Where an injury or illness requires immediate urgent attention, an ambulance will be called. When calling an ambulance, clear concise information will be relayed identifying the workers location and severity of the injury or illness.

Where the injury or illness requires the worker to leave the workplace for medical treatment, management will accompany the affected worker to provide all appropriate assistance. Where management are unavailable, another worker should accompany the affected worker, especially if there are concerns about the workers ability to travel.

Management will take any actions that will prevent or minimise the risk of further accidents, injury or property damage. For example, the accident site or equipment involved will be secured rendering it safe.

# INSPECTION, TESTING AND CALIBRATION

Introduction

A requirement of health and safety legislation is to inspect and/or test particular equipment and processes. Quality management requirement is calibrating particular equipment (e.g. weighing scales) to ensure readings are accurate.

Manhari Metals will conduct inspections and testing in accordance with health and safety legislation as part of the ongoing management of hazards in the workplace. A risk assessment will determine the frequency of the inspections if no prerequisite time frame exists.

Requirements for Inspection, Testing and Calibration

Manhari Metals will inspect and/or test the following:

* the workplace – site inspection – every six months
* portable electrical appliances – in accordance with the outcome of the risk assessment
* emergency procedures – at least once a year
* plant and equipment – before every use and as per the manufacturer’s recommendations
* Weighing scales – calibration

Records of the inspection/ testing/calibration activities will be maintained on either an internal register, record/report supplied by the tester or in item specific records such as a logbook or checklist

Any item failing an inspection/test will be tagged out of service and isolated from use until it has been repaired and deemed safe for use. Items that cannot be repaired will be disposed of in an appropriate manner.

Review of Inspection and Testing

Inspection and testing intervals will be reviewed as follows:

* At least annually
* After an incident or accident where a failure is attributed to inadequate inspection and testing
* When manufacturer or legislative requirements change
* In response to safety alerts.

Inspection and Testing of Registered Plant

Manhari Metals will ensure that the regulatory requirements for the inspection and testing of registered plant and equipment complies with the requirements of the Regulator.

# OFFICE SAFETY

Purpose

A large percentage of workplace incidents and injuries occur in offices. Manhari Metals is committed to providing a safe and healthy working environment free injury for all employees, clients and visitors.

This policy is intended to ensure safety in office environments.

Procedure

Like a workshop or laboratory, an office requires preventive measures to ensure a safe and healthy environment. Common causes of office incidents include the following:

* Slipping, tripping, and falling hazards.
* Burning, cutting, and pinching hazards.
* Improper lifting and handling techniques.
* Failure to remain attentive.
* Improper office layout and arrangement.
* Dangerous electrical wiring.
* Exposure to toxic substances.
* Horseplay.

Good Housekeeping Practices

Many office incidents are caused by insufficient housekeeping practices. By keeping the office floor both neat and clean, you can eliminate most slipping, tripping, and falling hazards. Other good housekeeping practices include the following:

* Ensure that office lighting is adequate. Replace burned out light bulbs and have additional lighting installed, as necessary.
* Ensure that electrical cords and phone cords do not cross walkways or otherwise pose a tripping hazard. If you cannot move a cord, have a new outlet installed or secure the cord to the floor with cord covering strips. Do not run cords underneath carpet and avoid the use of tape whenever possible.
* Report or repair tripping hazards such as defective tiles, boards, or carpet immediately.
* Clean spills and pick up fallen debris immediately. Even simple items such as a loose pencil could cause a serious falling injury.
* Keep office equipment, facilities, and machines in good condition.
* Store items in an approved storage space. Take care to not stack boxes too high or too tight. Clearly label boxes with their contents.
* Keep all drawers and cupboard doors closed when unattended.

Chemical Hazards

Many common office chemicals can cause injuries if improperly used, stored, or disposed. Some common office chemicals include cleaning agents, glues, correction fluid, inks, and toners.

To guarantee the safe use, storage, and disposal of the chemicals in your office, always review the Material Safety Data Sheet (MSDS) and/or container label for important information.

Cuts and Punctures

Cuts and punctures happen when people use everyday office supplies without exercising care. Follow these guidelines to help reduce the chance for cuts and punctures:

* When sealing envelopes, use a liquid dispenser, not your tongue.
* Be careful when using kitchen knives, scissors, staplers, letter openers, and box openers. Any of these items could cause a serious injury.
* Avoid picking up broken glass with your bare hands. Wear gloves and use a broom and a dust pan.
* Place used blades, broken glass, or other sharp objects in a rigid container, such as a box, before disposing in a wastebasket.

Machine Incidents

Only use machines that you know how to operate. Never attempt to operate an unfamiliar machine without reading the machine instructions or receiving directions from a qualified person. In addition, follow these guidelines to ensure machine safety:

* Secure machines that tend to unexpectedly move during operation.
* Do not place machines near the edge of a table or desk.
* Ensure that machines with moving parts are guarded to prevent Incidents. Do not remove these guards.
* Unplug defective machines, place "Out of Order" signs on them, and have them repaired immediately.
* Do not use any machine that smokes, sparks, shocks, or appears defective.
* Close hand-operated paper cutters after each use.
* Take care when working with copying machines. If you have to open the machine for maintenance, repair, or troubleshooting, remember that some parts may be hot. Always follow the manufacturer's instructions for troubleshooting.
* Unplug paper shredders before conducting maintenance, repair, or troubleshooting.

Some items can be very dangerous when worn around machinery with moving parts. Avoid wearing the following items around machines with moving parts:

* Loose belts
* Jewellery
* Long, loose hair
* Long, loose sleeves or pants
* Scarves
* Ties
* Slips, Trips, and Falls

The easiest way to avoid slips, trips, and falls is to pay attention to your surroundings and to avoid running or rushing. Additionally, you can improve the flow of office traffic by following these guidelines:

* Arrange office furnishings in a manner that provides unobstructed areas for movement.
* Keep stairs, steps, flooring, and carpeting well maintained.
* Ensure that glass doors have some type of marking to keep people from walking through, or into, them.
* Clearly mark any difference in floor level that could cause an Incident.
* Secure throw rugs and mats.
* Do not place wastebaskets or other objects in walkways.
* Close file drawers when you leave the cabinet.

Preventing Stress

To reduce stress and prevent fatigue, it is important to take mini-breaks throughout the day. If possible, change tasks at least once every two hours. Stretch your arms, neck, and legs often if you do the same type of work for long periods of time. Rest your eyes often by closing them or looking at something other than the work at hand. For a quick pick-me-up, breathe deeply several times by inhaling through your nose and exhaling through your mouth. In addition, try eating your lunch somewhere other than at your desk.

Other examples of stress-relieving exercises that can be done at your desk include the following:

* Head and Neck Stretch: Slowly turn your head to the left and hold it for three seconds. Slowly turn your head to the right and hold it for three seconds. Drop your chin gently towards your chest, and then tilt it back as far as you can. Repeat these steps five to ten times.
* Shoulder Roll: Roll your shoulders forward and then backward using a circular motion.
* Upper Back Stretch: Grasp one arm below the elbow and pull gently towards the other shoulder. Hold this position for five seconds and then repeat with the other arm.
* Wrist Wave: With your arms extended in front of you, raise and lower your hands several times.
* Finger Stretch: Make fists with your hands and hold tight for one second, then spread your fingers wide for five seconds.

Equipment Safety

Common office machines, such as the following, require special safety considerations: copiers, microwaves, shredders and computers. Be sure you know how to operate these machines before using them, and never use one of these machines if you think it is defective.

Other office equipment that requires safety consideration includes furniture such as file cabinets, shelves, desks, chairs, ladders, and step stools.

File Cabinets and Shelves

Because file cabinets and shelves tend to support heavy loads, treat them with special care.

Follow these safety guidelines for file cabinets:

* Secure file cabinets that are not weighted at the bottom.
* Ensure that file cabinet drawers cannot easily be pulled clear of the cabinet.
* Do not block room ventilation grates with file cabinets.
* Open only one drawer at a time to keep the cabinet from toppling.
* Close drawers when they are not in use.
* Do not place heavy objects on top of cabinets. Be aware that anything on top of a cabinet may fall off if a drawer is opened suddenly.
* Close drawers slowly using the handle to avoid pinched fingers.
* Keep the bottom drawer full. This will help stabilize the entire cabinet.

In addition, follow these safety guidelines for office shelves:

* Ensure shelves are secured.
* Place heavy objects on the bottom shelves. This will keep the entire structure more stable.
* Maintain 18 inches between top shelf items and the plane of the fire suppression sprinkler heads. In non-sprinkler areas, 24 inches must be maintained from top shelf items and the ceiling.
* Do not block room ventilation grates with shelves.
* Never climb on shelves (even lower shelves). Use an approved ladder or step stool.

Desks

Follow these safety guidelines for office desks:

* Keep desks in good condition (i.e., free from sharp edges, nails, etc)
* Ensure that desks do not block exits or passageways. Ensure that glass-top desks do not have sharp edges.
* Ensure that desks with spring-loaded tables function properly. The table should not spring forth with enough force to cause an injury.
* Do not climb on desks. Use an approved ladder or step stool.
* Keep desk drawers closed when not in use.
* Repair or report any desk damage that could be hazardous.

Chairs

Safety guidelines for office chairs include the following:

* Do not lean back in office chairs, particularly swivel chairs with rollers.
* Never climb on a chair. Use an approved ladder or step stool.
* Office desk chairs should have adjustable back supports and seat height. Make sure that your chair's back support position and seat height are comfortable.
* Take care when sitting in a chair with rollers. Make sure it does not roll out from under you when you sit down.
* Repair or report any chair damage that could be hazardous.
* Do not roll chairs over electrical cords.

Ladders and Step stools

Always use an approved ladder or step stool to reach any item above your extended arm height. Never use a makeshift device, such as a desktop, file cabinet, bookshelf, chair or box, as a substitute for a ladder or step stool.

Follow these guidelines when using ladders/step stools:

* Do not load ladders or step stools above their intended capacity.
* Place ladders or step stools on slip-free surfaces even if they have slip-resistant feet.
* Avoid placing ladders or step stools in walkways, and never place them in front of a door, unless the door is locked and barricaded.
* Refer to the Industrial Safety section in this manual for more information on ladder safety.

Ergonomics and Work Station Arrangements

Ergonomics involves adjusting work processes or stations to fit a particular employee. Improper ergonomic design can cause debilitating long-term musculoskeletal effects. Ensure Ergonomic principles are used when setting up Desks and Workstations.

# FATIGUE MANAGEMENT POLICY

We understand that scrap metal recycling can involve demanding jobs. With the objectives of Manhari Metals Work Health and Safety Policy in mind, we will use appropriate risk assessment tools to measure and monitor the risks associated with fatigue.

The fatigue management framework will be designed to provide:

* Discussions with employees regarding fatigue.
* Appropriate management of both employer and employee responsibilities to ensure legal and OH&S compliance.
* Management of risks associated employee fatigue
* Induction, training and education designed to assist managers, employees and their families, in addressing fatigue related issues.

Responsibilities

Manhari Metals management, its employees and contractors have a shared responsibility to avoid fatigue related performance impairment:

* We will ensure that, in the context of the performance required, adequate breaks are provided for recovery.
* Employees and contractors have a duty of care to ensure adequate sleep is obtained When this is not the case, employees have a further responsibility to report the matter to their supervisor/manager.
* Employees and contractors shall not drive for over five hours and 15 minutes without a break. Employees and contractors shall take break if they’re tired.

**At no time should an employee and/or contractor put themselves or others at risk.**

# DRUG AND ALCOHOL

Introduction

The misuse of drugs or alcohol by workers can affect their health or safety, as well as that of others (including other workers and members of the general public). Drug and alcohol misuse can also have an adverse effect on work performance, behaviour or attendance at the workplace.

Manhari Metals is committed to ensuring the health, safety and welfare of all workers and to preventing and reducing harm associated with being impaired by drugs or alcohol at work.

Manhari Metals may require screening for alcohol and drugs. This may include pre-employment testing or onsite testing prior to commencing work or at random intervals. Testing may be conducted based on reasonable suspicion or following an incident or accident. The Organisation reserves the right to carry out random testing across all levels of workers. Testing may include urine and/or swab testing.

Manhari Metals Responsibilities

Management will ensure these guidelines are enforced on a day to day basis. Where a Manager suspects or is informed that a worker may be unfit to perform their duties due to drug or alcohol misuse, it is management’s responsibility to assess the risk and take appropriate action. This may include:

* Directing any worker away from the work area and/or to a medical practitioner nominated by the employer where it is reasonably suspected that they are under the influence of drugs or alcohol
* Arrange for on-site testing for workers accused of being under the influence of drugs and alcohol
* Arrange for transport home for any worker under the influence of drugs or alcohol
* Counsel workers who are found to be in breach of these guidelines
* Authorise appropriate assistance for a worker whose performance is affected by drugs and/or alcohol.

Where the worker is deemed to be unfit for work due to the misuse of drugs or alcohol, he or she will usually be required to take leave without pay. In some instances workers may be allowed to take accrued personal leave instead of leave without pay. It is important to note that a worker who breaches the company’s drugs and alcohol policy will be subjected to the company’s disciplinary procedures. Such a breach could result in instant dismissal.

Manhari Metals have a company policy of .00 BAC for everyone’s safety.

Managers/Supervisors Responsibilities

Managers/supervisors are responsible for assessing the risks associated with workers who are under the influence of drugs or alcohol in the workplace and taking appropriate action to ensure these risks are managed. This will include:

* Directing any worker reasonably suspected of being under the influence of drugs or alcohol away from the work area and/or to a medical practitioner nominated by the Organisation for the purpose of undertaking a drug and alcohol test
* Where necessary, arranging for on-site testing of any worker accused of being under the influence of drugs or alcohol
* Arranging transport home for any worker accused of being under the influence of drugs or alcohol
* Counselling workers who are found to be in breach of these guidelines
* Authorising appropriate assistance for a worker whose performance is affected by drugs or alcohol
* Initiating the appropriate disciplinary processes where any breach of this policy is identified
* Ensuring day to day compliance with this policy and any other necessary requirements to ensure health and safety in the workplace.

Worker’s Responsibilities

Workers are responsible for:

* Ensuring they are fit for duty at all times while working
* Ensuring they are not under the influence of alcohol, drugs or medication of any kind where doing so could adversely affect their ability to perform their duties safely or efficiently
* Complying with statutory limits for blood alcohol and drug content while driving any motor vehicle, or operating any machinery, in or in connection with the performance of their duties
* Questioning their doctor or pharmacist as to the potential effects or side effects when using any prescription or over-the-counter medication, and whether they are still able to perform their job safely (including driving, where applicable)
* Notifying management when using any prescription or over-the-counter medication that may impair their ability to safely and effectively perform their job
* Ensuring they do not use, possess or distribute any alcohol, drugs or medication of any kind while at work, nor use the Organisation’s resources to do so at any time
* Notifying management if they suspect another worker or visitor to be adversely affected by alcohol, drugs or medication of any kind
* Complying with any reasonable request by management, or an authorised tester, to undergo testing and participate in rehabilitation programs in accordance with the Organisation’s Policy.

In addition, when working on client sites or at any other place of work, workers must comply with any site specific drug and alcohol policies.

If a worker in this situation has any doubt about how to comply with both policies, or if the policies are inconsistent, the worker should contact management for clarification as soon as possible. In the interim, the worker should refrain from any conduct which is likely to breach either of the policies.

# WORKING ALONE OR IN ISOLATION

Definitions

Working Alone or in Isolation

An employee can be considered to be working alone or in isolation even if other people are close by, whether for a short amount of time or even weeks on end. Common examples:

* Workers accompanying clients to appointments after hours
* Working in the office outside business working hours
* Working alone remotely.

Remote or Isolated work

is work that is isolated from the assistance of other people because of the location, time or nature of the work being done. Isolated work may involve a geographically isolated area, on or off site, either during or outside normal working hours. Remote work may involve work activities where there are few people and where communications and travel are difficult.

Lone workers

Those workers who work with others with only limited support arrangements, which therefore expose them to risk by being isolated from the usual back-up support. This is the case whether they regularly work alone or are only occasionally alone and do not have access to immediate support from Managers / Supervisors / Site Manager or other colleagues.

Responsibilities

Top management

* Ensure that this procedure and protocols are implemented.
* Ensure that site management staff are trained and are aware of the risk management process

Managers / supervisors

It is the responsibility of all managers and supervisors to ensure that this policy is fully implemented in their area(s). This includes:

* Providing effective communication tools or devices for workers performing remote or isolated work
* Being aware of the hazards and risks associated with remote and isolated work.
* providing safe systems of work, including developing shift work rosters, travel itineraries, emergency procedures and training in the use of emergency equipment
* Providing and maintaining safe plant and structures
* Providing adequate support facilities for the welfare at work of workers carrying out remote or isolated work
* Providing advice, information, training, instruction, or supervision that is necessary to protect all persons from risks to their health and safety, arising from remote or isolated work
* Monitoring conditions at the workplace for the purpose of preventing illness or injury to workers

Employee responsibilities

* Take reasonable care for their own health and safety and that of others who may be affected by their acts or omissions in the workplace.
* Cooperate with Manhari Metals actions to make the workplace safe (e.g. by following any information, instruction, training, and this procedure). This includes
* maintain regular contact and communications with their managers, if working from remote areas or in isolation
* maintain movement records, if travelling in or between remote areas
* make sure they receive adequate training, especially if they are working in isolation with specialist equipment
* provide notice to their supervisors / managers of their intention of working alone or in isolation.

Working alone in the office

All workers working alone in the office will follow the following arrangements:

* Obtain written approval from the Manager / Supervisor / Site Manager
* Inform the security firm monitoring the premises prior to commencing the after-hours work and when it is completed
* Check that the external doors are locked at all times
* Not allow anyone unauthorised to enter the
* Communicate with the manager or the nominated person at the beginning of the shift, every four hours during the shift and at its completion, either by SMS or telephone
* Check that they are aware of emergency procedures including exit routes.

Authorisation / Permit to Work in Isolated Areas (other than working alone in the office)

Authorisation to work alone or in isolation must be obtained prior to commencement of work. This should be signed by the supervisor/manager or other authorised person. An exchange of emails will suffice but records must be retained. Up to the discretion of the Manager / Supervisor / Site Manager the Working Alone or in Isolation Checklist may be completed for high risk activities.

The authorisation or permit will specify:

* Duration of the approval or permit
* Areas that can be accessed / used
* Procedures, equipment, and tasks that can be undertaken
* Assessment of competency for activity

For work which is undertaken on a regular basis, the same Email (or Working Alone or in Isolation Checklist) can be utilised while the conditions remain current as documented on the Working Alone or in Isolation and providing it takes into account all conditions likely to be experienced during the period of approval.

Communication

Communication will be considered for all the remote or isolated work, ensuring that the following principles apply:

* All workers will have adequate access to communication in cases of emergency
* Mobile coverage in the work area and access to power for recharging telephone batteries will be considered when planning work in remote areas
* Where access to mobile networks is inadequate other forms of communication will be considered, such as radio, satellite, or personal security systems
* Regular systems for communication and monitoring of workers’ movements will be set up and maintained

Emergency situations

The following principles will apply for emergency arrangements for remote or isolated workers:

* They will have access to first aid equipment and facilities at all times
* Where first aid kits are provided to workers, they will be trained in using the kit
* The need for first aid training in remote situations will be considered
* Emergency procedures will be established, and appropriate training provided to ensure that all workers are aware of the procedures.

If a worker suffers an injury while working alone or while working alone in the office and is able to use a means of communication, contact is to be made immediately with the employer and emergency services if appropriate. Refer to Emergency Contacts displayed on the Noticeboard.

When attempts to contact a worker working in isolation are unsuccessful, the supervisor must make an immediate visit to the work area or such other action as appropriate to ensure that the worker is safe.

Travel and Field Work

The following principals shall apply for travel arrangements.

* Ensure workers are aware of and comply with the fatigue management policy, especially relating to long distance travel
* Check that the vehicle used for travel is fit for purpose (e.g. where 4WD is required)
* Consider the skills required for safe operation of the specialised vehicles (e.g.4WD)
* Ensure that the vehicle is equipped with appropriate emergency equipment
* Carefully plan and prepare for any field work travel considering at least:
  + - The number of people required for safe operations
    - Skills and experience of the people in the field party
    - Health of the participants
    - Emergency preparedness and response strategy
    - First aid resources
    - Amount and weight of equipment.

Forms

Working Alone or in Isolation Checklist

# WORKPLACE HARASSMENT/BULLYING

Purpose

To provide a safe workplace to all Manhari Metals Employees through effective management of workplace harassment/bullying.

Policy

Manhari Metals is committed to providing a work environment that is pleasant for employees to work in and conducive to good workplace relations. This policy is aimed at ensuring that employees are not subjected to any unwanted workplace harassment/bullying. Harassment/bullying in the workplace decreases productivity, increases absenteeism and is also against the law. For these reasons, harassment/bullying will not be tolerated at Manhari Metals. For the purpose of this policy ‘harassment’ includes bullying.

**Harassment/Bullying** - Workplace harassment/bullying is where a person or persons are subjected to unreasonable behaviour, other than sexual harassment, that is unwelcome and unsolicited, the person considers to be offensive, intimidating, humiliating or threatening and/or a reasonable person would consider to be offensive, humiliating, intimidating or threatening.

Examples of unreasonable behaviour include, but are not limited to:

* Abusive, insulting or offensive language or comments;
* Unjustified criticism or complaints;
* Repeated threats of dismissal;
* Exclusion from activities where deliberate;
* Spreading rumours;
* Setting unreasonable work tasks or timelines;
* Sabotaging a person’s work performance by withholding information or giving incorrect information;
* Changing of rosters/work arrangements so as to deliberately inconvenience an employee or employees.

What is **not** considered unreasonable behaviour:

* Setting reasonable work tasks and timelines;
* Reasonable rostering/work arrangements;
* Deciding not to select an employee for promotion where a reasonable process is followed;
* Informing an employee about unsatisfactory work performance in an honest, fair and constructive way;
* Informing an employee about inappropriate behaviour in an objective and confidential way; Implementing organisational changes or restructuring;
* Taking disciplinary action, including suspension or terminating employment.

Manhari Metals has a legal responsibility to take reasonable steps to prevent harassment from happening in the workplace. This involves educating employees about harassment, putting in place this policy, setting behaviour standards, implementing grievance and complaint handling procedures, and ensuring compliance by all in the workforce.

Harassment in the workplace can create unpleasant or even hostile work environment. Harassment makes work difficult for every one – the person being harassed, as well as employees witnessing the harassment. The harasser also is not concentrating on their work when he/she engages in this type of behaviour. It can also damage the reputation of a company.

Harassment outside the workplace

Workplace harassment can take place off site. Examples would be harassment occurring at a work Christmas party, unwanted phone calls to an employee’s home, and following employee’s home from work text messaging, internet chat rooms or other social media channels.

Harassment of Customers

The way employees treat clients and customers is extremely important for the image of the company. Harassment of customers or clients is not only bad for business; it is against the law and can result in legal action being taken by the customer or client against the company.

Bullying and workplace violence

Workplace violence is any action, incident or behaviour in which a person is physically assaulted, threatened, harmed or injured in circumstances relating to their work. The risk of workplace violence must be eliminated or minimised so far as is reasonably practicable.

Incidents of workplace violence (i.e. physical assault or the threat of physical assault) should be reported to the police because these are criminal matters.

Victimisation

Victimisation happens where an employee is treated harshly or subjected to any detriment because they have made a complaint of discrimination or harassment. Victimisation will also happen if a person is subjected to a detriment because they have furnished any information or evidence in connection with a discrimination complaint.

A complaint of victimisation is made in the same way as a complaint of discrimination or harassment. Victimisation is either dealt with as an offence punishable by fine, or can be the subject of a damages award, depending on which law the complaint is brought under.

Responsibility

Managers/Supervisors

* Managers and supervisors must ensure that they do not harass or bully employees, other managers or supervisors, clients or customers.
* Carry out risk assessments and implement control measures to prevent workplace harassment within Manhari Metals
* Ensure all employees have been provided with information regarding their rights and responsibilities in relation to workplace harassment.
* Ensure they have the appropriate training in handling workplace harassment complaints, including an understanding of both informal and formal complaint resolution options.

All Employees

* Each employee must ensure that they do not engage in harassing or bullying behaviour towards other employees, managers or supervisors, clients or customers.
* Employees should be aware that they can be held legally responsible for their unlawful acts.
* Employees, who aid, abet or encourage other persons to harass and bully can also be held legally liable.
* Raise any issues or concerns relating to workplace harassment with Manager or Supervisor.
* Ensure they have an understanding of the options available to resolve workplace harassment issues.

Behaviour standards

Manhari Metals has standards of behaviour for employees to:

* Act in a responsible and professional manner;
* Treat others in the workplace with courtesy and respect;
* Listen and respond appropriately to the views and concerns of others;
* Be fair and honest in their dealings with others.

Complaint Handling System

Any complaints of workplace harassment must be treated seriously and investigated promptly, confidentially and impartially. Harassment complaints can be lodged informally or formally. The compliant system developed must therefore be capable of managing both types of complaints.

Informal Complaints

An informal complaint handling system may encourage employees to raise their concerns with an appropriate contact person within the workplace and the matter resolved in an informal and fair manner.

Formal Complaints

The system implemented to manage formal complaints of harassment must include the following:

* a formal reporting procedure
* an investigation procedure
* a complaint resolution procedure
* an appeals process

Grievance Procedure

If you believe that you are being harassed/bullied, there are a number of important steps you should take:

1. Tell the person that their behaviour is unacceptable, and that it must stop. It is important to say these things to the harasser otherwise they may interpret your silence as consent.
2. Report the behaviour or incident to your manager. If the alleged perpetrator is a manager then report the manager to a senior manager.
3. Keep your complaint confidential – this will avoid idle gossip and the possibility of defamation proceedings against you or the company

If you make a complaint of workplace harassment/bullying it will be taken very seriously and will be dealt with sympathetically and in a confidential manner. The complaint will be investigated and, if found to be proved, appropriate warnings or other disciplinary action will be taken against the harasser. In serious cases, the harasser may be dismissed. You will not be victimised or treated unfairly for making a complaint.

If you are not satisfied with the way in which the company has dealt with your complaint, you can apply to the Fair work Commission for an order to stop the workplace bullying. Such employees should contact the Fair Work Commission to find out if they are eligible to apply for an order.

Education and Training

Manhari Metals will ensure that all employees are provided with the appropriate training and education on issues of workplace harassment which will enable them to:

* Understand the behaviours that are or are not workplace harassment.
* Understand the consequences of workplace harassing behaviours.
* Understand the process for lodging complaints of workplace harassment.

Forms /Records

Inappropriate Behaviour Register

# SEXUAL HARASSMENT

Purpose

Manhari Metals is committed to ensuring that the Workplace is free from Sexual Harassment. Sexual harassment will not be tolerated, and that disciplinary action will be taken against any employee that breached the policy.

Scope

This procedure applies to all Manhari Metals employees.

Responsibility

Employer Responsibilities:

* The employer, as well as the person or persons who engaged in the sexual harassment can be liable to pay compensation for loss or damage suffered by a person as the result of sexual harassment. (Vicarious Liability).
* Employer must take ‘reasonable steps’ to prevent employees from treating others unfairly or badly.
* 'Reasonable steps' include having clear policies about fair treatment in the workplace, providing information and training for all staff, especially managers and supervisors, and having a fair process in place for dealing with complaints.

Management and Supervisors must ensure that:

* new staff are given training on appropriate behaviour in the workplace.
* supervisors, managers and staff are trained regularly in discrimination law.
* they model appropriate behaviour themselves .
* there is a clear workplace policy on appropriate behaviour which is reviewed and updated annually.
* there is a process to deal with any complaints quickly, privately and seriously.

Employees must:

* Comply with the organisations sexual harassment policy;
* Maintain complete confidentiality if they provide information during the investigation of a complaint.

Procedure

Sexual harassment is an unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated or intimidated, and where that reaction is reasonable in the circumstances.

It has nothing to do with mutual attraction or friendship between people. Sexual harassment does not have to be deliberate or repeated to be illegal. Some sexual harassment, such as sexual assault, indecent exposure and stalking is also a criminal offence.

Manhari Metals aims to:

* Create a working environment which is free from sexual harassment and where all members of staff are treated with dignity, courtesy and respect.
* Implement training and awareness raising strategies to ensure that all employees know their rights and responsibilities.
* Provide an effective procedure for complaints, based on the principles of natural justice.
* Treat all complaints in a sensitive, fair, timely and confidential manner.
* Guarantee protection from any victimisation or reprisals.
* Encourage the reporting of behaviour which breaches the sexual harassment policy.
* Promote appropriate standards of conduct at all times.

A person sexually harasses another person (the person harassed) if:

* The person makes an unwelcome sexual advance, or an unwelcome request for sexual favours, to the person harassed.
* Engages in other unwelcome conduct of a sexual nature in relation to the person harassed.
* In circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

Examples of Sexual Harassment include:

* Staring or leering.
* Unnecessary familiarity, such as deliberately brushing up against you or unwelcome touching.
* Suggestive comments or jokes.
* Insults or taunts of a sexual nature.
* Intrusive questions or statements about your private life.
* Displaying posters, magazines or screen savers of a sexual nature.
* Sending sexually explicit emails or text messages.
* Inappropriate advances on social networking sites.
* Accessing sexually explicit internet sites.
* Requests for sex or repeated unwanted requests to go out on dates.
* Behaviour that may also be an offence under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communications.

An employee who has been sexually harassed may seek assistance and further options from their manager, or other representative.

Complaints can be made to the relevant state authority in accordance with state legislation.

Complaint Handling System

Any complaints of workplace harassment must be treated seriously and investigated promptly, confidentially and impartially. Harassment complaints can be lodged informally or formally. The compliant system developed must therefore be capable of managing both types of complaints.

Informal Complaints

An informal complaint handling system may encourage employees to raise their concerns with an appropriate contact person within the workplace and the matter resolved in an informal and fair manner.

Formal Complaints:

The system implemented to manage formal complaints of harassment must include the following:

* A formal reporting procedure
* An investigation procedure
* A complaint resolution procedure
* An appeals process

Grievance Procedure

If you believe that you are being harassed/bullied, there are a number of important steps you should take:

1. Tell the person that their behaviour is unacceptable, and that it must stop. It is important to say these things to the harasser otherwise they may interpret your silence as consent.
2. Report the behaviour or incident to your manager. If the alleged perpetrator is a manager then report the manager to a senior manager.
3. Keep your complaint confidential – this will avoid idle gossip and the possibility of defamation proceedings against you or the company

If you make a complaint of workplace harassment/bullying it will be taken very seriously and will be dealt with sympathetically and in a confidential manner. The complaint will be investigated and, if found to be proved, appropriate warnings or other disciplinary action will be taken against the harasser. In serious cases, the harasser may be dismissed. You will not be victimised or treated unfairly for making a complaint.

If you are not satisfied with the way in which the company has dealt with your complaint, you can apply to the Fair work Commission for an order to stop the workplace bullying. Such employees should contact the Fair Work Commission to find out if they are eligible to apply for an order.

# HAZARDOUS MANUAL HANDLING

Introduction

In the scrap metal recycling and waste collection industries is ‘muscular stress while handling objects other than lifting’. Hazardous manual handling describes any work requiring a person to lift, lower, push, pull, hold, carry, move or restrain any animate or inanimate object and involves one or more of the following:

* High or sudden force
* Awkward posture
* Exposure to vibration.
* Sudden damage - e.g. from a single lift of something very heavy or awkward to handle or from tripping and falling while carrying an object.
* Reaching above shoulder height to either access items or work for any length of time in this position;
* There is too much twisting and bending;
* Excessive forward reaching is required;
* Items such as machine parts are too heavy when other risk factors, such as:
* Lifting or carrying a heavy object
* Carrying unstable loads
* Pushing or pulling an object that is hard to move
* Lifting a heavy item from a high shelf
* Bending over for extended periods of time.
* Picking - resulting in sprains, strains, cuts etc.

Some manual handling and ergonomic activities are hazardous and may cause musculoskeletal disorders. Manual handling injuries are the most common type of workplace injuries across Australia.

The most common location of injury is for metal scraping is the lower back, followed by shoulders, knees, ankles and hands. The occupations that recorded most injuries are truck drivers followed by recycling and rubbish collectors. Work activities that result in injuries are diverse and relate to trucks, bins and containers, loading plant, traffic and ground surfaces.

Manhari Metals and particularly the managers and supervisors have a duty to ensure that effective procedures are implemented to identify, assess and control manual handling hazards. Hazardous manual handling tasks in the workplace will be addressed via a risk management approach.

The risk management process is to be carried out in consultation with the workers who are required to perform manual handling. Representatives of workers, such as health and safety committee members or representatives, will also be consulted as required or requested.

Identifying Manual Handling Hazards

Manual handling hazards can be identified by:

* observing how workers perform the work
* reviewing injury and incident records
* consulting with the workers performing the manual handling.

Assessing Manual Handling Risks

As part of the hazard management approach, Manhari Metals has an obligation to ensure that any manual handling that poses a risk of injury to workers are assessed to determine the seriousness of these hazards. To assist in accurately assessing manual handling risks a checklist has been developed and needs to be completed for each identified activity. This checklist is on the **Hazardous** **Manual Handling Risk Assessment Form**.

In assessing risks arising from manual handling, the following factors should be considered:

* the positions, posture, actions and movements adopted by workers in performing manual handling
* the layout of the workplace and workstation
* the duration and frequency of tasks performed by workers
* the location of loads and distances moved manually
* the weights and forces of loads that are manually handled
* the characteristics of loads and equipment available to assist in manual handling tasks
* the skills and experience of workers who are performing manual handling tasks, along with any special needs or requirements they may have
* any clothing (including protective clothing) that is available or worn whilst performing manual handling
* any other factors considered relevant to the workers.

This risk assessment process is to be carried out in consultation with the workers who are required to perform manual handling. Representatives of workers, such as health and safety committee members or representatives, will also be consulted.

In assessing manual handling risks in the workplace, the Hazardous Manual Handling Risk Assessment will be used. Once this is done, the management shall complete Manual Tasks Safety Checklist and implement controls.

Controlling Manual Handling Risks

Manhari Metals will ensure, as far as reasonably practicable, that the risks associated with manual handling in the workplace are controlled. The process of controlling manual handling risks will be determined in consultation with the workers who are required to carry out the manual handling.

In the event that manual handling has been assessed as a risk, Manhari Metals will redesign the manual handling to eliminate or control the risk factors and ensure that workers involved in manual handling receive appropriate training, including training in safe manual handling techniques.

These controls may include, training and supervision and provision of a range of equipment such as:

* Trolleys
* Castors and wheels
* Forklifts
* Hand trucks
* Lift tables
* Work stands
* Pallet lifters
* 2 person lift – items more than 20kg.

Where redesign of the manual handling is not possible, Manhari Metals will:

* Provide mechanical aids, personal protective equipment and/or arrange for team lifting to reduce the risk
* Ensure that workers receive appropriate training in safe methods of manual handling appropriate for the work identified, and in the correct use of mechanical aids, protective equipment and group lifting procedures.

# WORKPLACE TRAFFIC MANAGEMENT

This General Plan provides information on how to manage traffic risks at a workplace. It is supported by specific guidance material on traffic management for a number of different workplaces and scenarios.

Traffic at a workplace includes:

* vehicles such as cars, trucks, vans and buses
* powered mobile plant such as forklifts, and
* pedestrians.

This Plan applies to all workplaces or undertakings, including off site work under the management of Manhari Metals where there is a risk of traffic colliding with people in the workplace. This does not, however, apply to work which is carried out on or near a public road, for example unloading plant or heavy machinery on a road or working on a footpath or nature strip adjacent to a road.

If your work involves a public road you should contact your local road authority for the relevant traffic management requirements and guidelines.

Site specific traffic plans for Manhari Metals sites at Tottenham and Horsham will be the subject of separate procedures.

Who has duties under the law?

Everyone in the workplace has a work health and safety duty. The main duties are set out in the table below.

|  |  |
| --- | --- |
| **Who** | **Duties** |
| **Manhari Metals** | Manhari Metals must ensure, so far as is reasonably practicable, that workers and other people are not exposed to health and safety risks arising from the business or undertaking. |
| **Manhari Metals** | Manhari Metals must ensure, so far as is reasonably practicable, the workplace, the means of entering and exiting the workplace and anything arising from the workplace is without risks to health and safety.  Manhari Metals must ensure it does not collide with pedestrians or other powered mobile plant. If there is a possibility of collision, the plant must have a warning device alerting persons who may be at risk from its movement. |
| **Designers, manufacturers, suppliers and importers** | Designers, manufacturers, suppliers and importers of plant or structures must ensure, so far as is reasonably practicable, the plant or structure is without risks to health and safety. For example, workplaces can be designed with vehicle and pedestrian routes that are separated. Mobile plant can be designed so the operator can see easily and the plant has speed limiters and warning devices. |
| **Manhari Metals senior management** | Manhari Metals Top Management, such as company directors, have a duty to exercise due diligence to ensure the business or undertaking complies with the Work Health and Safety (WHS) Act and Regulations. This includes taking reasonable steps to ensure the business or undertaking has and uses appropriate resources and processes to eliminate or minimise risks from traffic at the workplace. |
| **Workers and**  **others** | Workers and other people at the workplace must take reasonable care for their own health and safety, co-operate with reasonable policies, procedures and instructions and not adversely affect other people’s health and safety. |

How can traffic risks be managed?

Use the following steps to ensure, so far as is reasonably practicable, that workers and other people are not exposed to health and safety risks:

1. **Find out what could cause harm.** The following can help you identify potential hazards.
2. **Observe the workplace to identify areas where pedestrians and vehicles interact.** Think about the floor plan of your workplace, if work is done close to public areas, when traffic volumes are higher, where potential blind spots are and other areas of poor visibility. Security footage may be useful if available.
   1. Ask your workers, pedestrians and visiting drivers about traffic management problems they encounter at your workplace.
   2. Review your incident and injury records including near misses.
3. **Assess the risk.** In many cases the risks and related control measures will be well known. In other cases you may need to carry out a risk assessment to identify the likelihood of somebody being harmed by the hazard and how serious the harm could be. A risk assessment can help you determine what action you should take to control the risk and how urgently the action needs to be taken.

Most vehicle incidents at the workplace are from collisions between pedestrians and vehicles reversing, loading and unloading. People who work with or near vehicles are most at risk. Customers and visitors may also be at risk.

1. **Take action to control the risk.** The OHS laws require a business or undertaking do all that is reasonably practicable to eliminate or minimise risks.

The ways of controlling risks are ranked from the highest level of protection and reliability to the lowest. This ranking is known as the hierarchy of risk control. You must work through this hierarchy to manage risks.

The first thing to consider is whether hazards can be completely removed from the workplace. For example, risks can be eliminated by physically separating pedestrian routes from vehicle areas. This could be done by conducting activities at times when pedestrians are not present, using physical barriers or overhead walkways.

If it is not reasonably practicable to completely eliminate the risk then consider one or more of the following options in the order they appear below to minimise risks, so far as is reasonably practicable:

* substitute the hazard for something safer e.g. replace forklifts with other load shifting equipment like a walker stacker or pallet jacks
* isolate the hazard from people e.g. by creating a delivery area away from other pedestrians or work activities
* use engineering controls e.g. speed limiters on forklifts, presence sensing devices or interlocked gates.
* If after implementing the above control measures a risk still remains, consider the following controls in the order below to minimise the remaining risk, so far as is reasonably practicable:
* use administrative controls e.g. warning signs or schedule delivery times to avoid or reduce the need for pedestrians and vehicles to interact
* use personal protective equipment (PPE) e.g. high visibility clothing.

A combination of the controls set out above may be used if a single control is not enough to minimise the risks. You need to consider all possible control measures and make a decision about which are reasonably practicable for your workplace. Deciding what is reasonably practicable includes the availability and suitability of control measures, with a preference for using substitution, isolation or engineering controls to minimise risks before using administrative controls or PPE. Cost may also be relevant, but you can only consider this after all other factors have been taken into account.

1. Check your control measures regularly to ensure they are working as planned. Control measures need to be regularly reviewed to make sure they remain effective, taking into consideration any changes, the nature and duration of work and that the system is working as planned.

[Code of Practice: How to manage work health and safety risks.](http://www.safeworkaustralia.gov.au/sites/swa/about/publications/pages/manage-whs-risks-cop)

Who is involved?

You must consult your workers and their health and safety representatives (if any) when deciding how to manage the risks of traffic in the workplace, including when making changes. You should encourage reporting of safety problems.

If there is more than one business or undertaking involved at your workplace you must consult them to find out who is doing what and work together so risks are eliminated or minimised so far as is reasonably practicable.

This may involve discussing site-specific requirements including entering and exiting the site, vehicle parking, delivery areas and scheduling suitable times for loading and unloading.

Further information on consultation requirements is in the [Code of Practice: Work health and safety consultation, co-operation and co-ordination.](http://www.safeworkaustralia.gov.au/sites/swa/about/publications/pages/consultation-cooperation-coordination-cop)

Traffic Management Plans

Manhari Metals shall develop a Traffic Management Plan for each site.

A traffic management plan may include details of:

* Speed limits
* Exclusion zones, if any
* Give way rules
* The desired flow of pedestrian and vehicle movements
* The expected frequency of interaction of vehicles and pedestrians
* Illustrations of the layout of barriers, walkways, signs and general arrangements to warn and guide traffic around, past, or through a work site or temporary hazard, and
* How short term, mobile work and complex traffic situations will be managed.

A traffic management plan could also set out:

* Responsibilities of people managing traffic in the workplace
* Responsibilities of people expected to interact with traffic in the workplace, and
* Instructions or procedures for controlling traffic including in an emergency.

A traffic management plan should be regularly monitored and reviewed and importantly following an incident to ensure it is effective and considers changes at the workplace.

You should ensure workers are familiar with the traffic management plan and you should provide information, instruction and training on its use.

Information, Training, Instruction and Supervision

Before mobile plant is used in your workplace you must provide anyone who will use it with the information, training, instruction or supervision necessary to protect them and others from the risks associated with traffic in a workplace.

Workers including contractors who are required to perform duties associated with traffic management at the workplace should be trained to perform those duties. Training should be provided to workers by a competent person.

Responsibilities for health and safety management must be clearly allocated. It is important each worker, contractor, subcontractor, visiting driver and other relevant people clearly understand their role in following safe work practices and taking reasonable care of themselves and others.

You should provide supervision to ensure safety procedures are being followed, particularly if you are relying on administrative control measures to minimise risks.

You must ensure so far as is reasonably practicable, everyone who has access to your workplace including visitors are provided with information necessary to protect them from risks to their health and safety, for example instructions on designated safe routes, parking areas, pedestrian exclusion zones and speed limits. This could be addressed through an induction process at your workplace.

Visitors should report to the reception area or site office and be given information on the safety procedures for the workplace before they are allowed into areas where vehicles and powered mobile plant are used.

You must ensure that any information, training and instruction provided, is presented so it is easily understood by workers. This may require providing information and training material in different languages.

Ways to control traffic risks

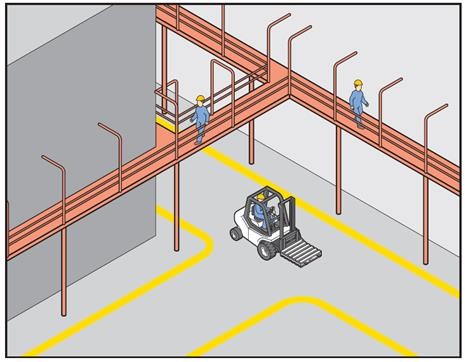
Keeping people and vehicles apart is the best way to protect pedestrians is to make sure people and vehicles cannot interact. Where powered mobile plant is used at a workplace, you must ensure it does not collide with pedestrians or other powered mobile plant.

This can be achieved by not allowing vehicles in pedestrian spaces or not allowing pedestrians in vehicle operating areas, for example using overhead walkways (see Figure 1). However, this may not be reasonably practicable in all workplaces. If people and vehicles cannot be separated you should consider using:

* barriers or guardrails at building entrances and exits to stop pedestrians walking in front of vehicles (see Figure 2)
* high impact traffic control barriers (see Figure 3)
* temporary physical barriers (see Figure 4), or
* separate, clearly marked footpaths or walkways e.g. using lines painted on the ground or different coloured surfacing (see Figure 5).

Pedestrian routes and intersections should be clearly marked, unobstructed, well maintained and well lit.

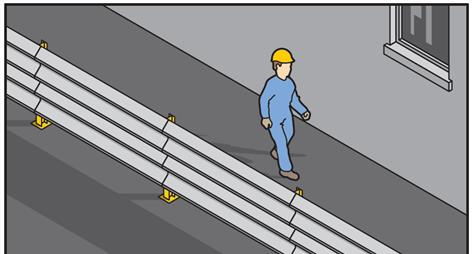
**Figure 1** Overhead walkways



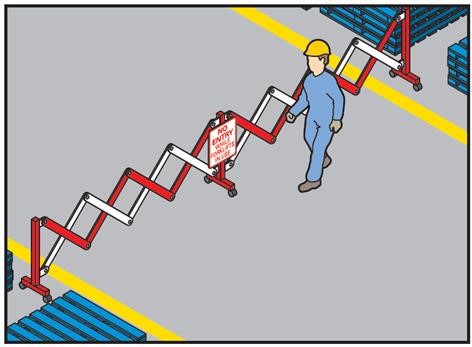
**Figure 2** Guardrail



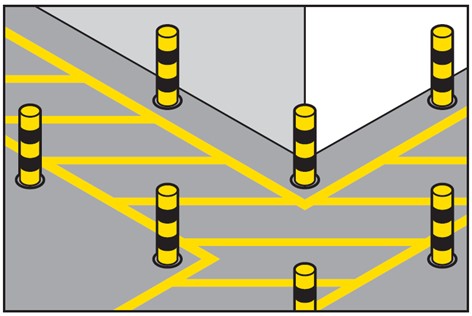
**Figure 3** High impact barrier



**Figure 4** Temporary physical barriers separating pedestrians from powered mobile plant



**Figure 5**Walkway marked with lines and bollards



Vehicle Routes

Vehicle routes at the workplace should have a firm and even surface, be wide and high enough for the largest vehicle using them and be well maintained and free from obstructions. They should be clearly sign-posted to indicate speed limits, traffic calming measures like speed humps and parking areas.

Reducing speed is very important where administrative control measures are the only reasonably practicable approach. Speed limits should be implemented and enforced and traffic calming devices like speed humps considered. Variations to speed limits should be clearly signposted.

More examples of how vehicle routes can be managed safely are in Appendix A.

Pedestrian Crossings

If pedestrians have to cross vehicle routes in the workplace you can manage the risk in a number of ways, for example interlocked gates or gates with warning devices, physical barriers or rails, traffic light systems or having a competent worker direct traffic.

Pedestrian crossings should be clearly marked with ground markings, lights or signs. If the vehicle route to be crossed is a road or railway consider control measures that will work with those already established by the relevant authority, for example a local council or rail authority.

Both pedestrians and vehicles should have good visibility, for example pallet goods should not be stored in a way that would obscure vision.

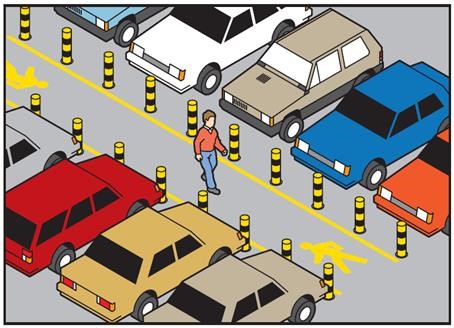
Procedures indicating who has right of way at crossings should also be established.

Parking Areas

Parking may be needed for workers, visitors, trucks and other vehicles used in the workplace. Consider setting out the workplace so parking areas:

* are located away from busy work areas and traffic routes
* have walkways leading to and from parking areas which are separated from vehicles or vehicle routes e.g. use physical controls like barriers or bollards to prevent vehicles from crossing into walking areas (see Figure 6), and
* are clearly marked and sign-posted, well lit and unobstructed.

**Figure 6** Pedestrian walkway in car park



Reversing Vehicles

If reasonably practicable eliminate the need for reversing by using drive-through loading and unloading systems, multi-directional mobile plant or rotating cabins. Where this is not possible consider:

* using devices like reversing sensors, reversing cameras, mirrors, rotating lights or audible reversing alarms
* using a person to direct the reversing vehicle if they cannot see clearly behind—this person should be in visible contact with the driver at all times and wear high-visibility clothing
* providing designated clearly marked, signposted and well lit reversing areas, and
* excluding non-essential workers from the area.

Loading and Unloading Vehicles

Figure 7 provides examples of measures to manage loading and unloading activities safely.

It is important to make sure visitors including visiting drivers are aware of the workplace layout, the route they should take and safe working procedures for the workplace. Provide drivers with safe access to amenities away from loading areas or other vehicular traffic. To reduce driver fatigue a seat should be provided for long loading times.

If you have created zones to separate vehicles from people—called ‘exclusion zones’—the person operating the powered mobile plant such as forklifts should control the exclusion zone. Clear operating procedures should be understood and implemented at all times.

Provide effective ways to warn of loading in progress to other plant operators, drivers and pedestrians. Warning devices can include signage, cones, lights, alarms and horns.

Ways to stop vehicles from moving during loading and unloading activities include using:

* vehicle or trailer restraints
* dock locks
* air brake isolation interlock devices
* traffic lights
* barriers or other ‘stop’ signals
* systems for controlling access to vehicle keys or the cabin, and
* safe systems of work which make sure the driver is aware of when it is safe to leave.

**Figure 7** Example of traffic control measures for truck loading and unloading

|  |  |
| --- | --- |
|  | Clearly designated  pedestrian walkway protected by physical barriers with staggered barriers to control approaching pedestrians.  Pedestrian exclusion zone has been established for a distance equal to the height of the load from the ground plus an additional allowance for the type of load.  Beam from  pedestrian-sensing device.  Barriers, bollards,  witches hats or paint marking the pedestrian exclusion zone.  Warning light activated by pedestrian sensors.  Establish a safety zone for the driver and other pedestrians. The driver should be in full view of the forklift operator. Stop the loading and unloading activities if the driver cannot be seen or needs to enter the exclusion zone.  Alternatively, if it is safe to do so the system of work can provide for the driver to stay in the cabin during loading and unloading. Effective communication systems between the plant operator and the driver should be used such as a system of hand signals or two-way radios. |

Signs and road markings

Clear road markings like reflective paint and signs should be used to alert pedestrians and vehicle operators to traffic hazards in the workplace.

Signs should be provided to indicate exclusion and safety zones, parking areas, speed limits, vehicle crossings and hazards like blind corners, steep gradients and where forklifts are in use.

Signs and road markings should be regularly checked and maintained so they can be easily seen.



Lighting

Traffic routes, manoeuvring areas and yards should be well lit with particular attention given to junctions, buildings, walkways and vehicles routes. Where possible they should be designed to avoid extreme light variation, for example drivers moving from bright into dull light or vice versa.

Traffic control measures

The following information provides further examples of how traffic hazards and risks can be managed. Some examples may not be reasonably practicable to implement in your business or undertaking.

How can people and vehicles be kept apart?

* Use interlocking, chicaned or hinged gates that open towards the pedestrian—these methods create a stop or pause in the pedestrian’s movement before entering a vehicle area.
* Use boom gates and proximity devices which trigger boom gates.
* Provide separate entries and exits for pedestrians and vehicles.
* Create exclusion zones e.g. forklift-only areas in loading bays or pedestrian-only areas around tearooms, amenities and entrances.
* Schedule work to prevent mobile plant and pedestrians being in the same area at the same time.
* Have pedestrian routes which represent paths people would naturally follow to encourage pedestrians to stay on designated safe routes and avoid taking potentially hazardous shortcuts.
* Remove or identify blind corners using bollards.
* Use vision panels in pedestrian doors entering vehicle areas.
* Use staging areas to facilitate alternative load shifting equipment.

How can vehicle routes be managed safely?

* Provide vehicle routes that are:
  + One-way with enough passing space around stationary vehicles
  + Wide and high enough for the largest vehicle using them including their load, taking into account turning circles, stopping distances and the need to reverse
  + Flat or only have small slopes (steep gradients which cannot be avoided should be clearly signposted and guarded. Powered mobile plant like forklifts should operate on gradients only if the manufacturer specifies they are able to do so)
* avoid sharp or blind corners o well drained, maintained and lit, and o free from obstructions, grease, and surface damage.
* Manage queuing vehicles with enough space so queues do not impact on other traffic or block emergency exits. Workplaces with a large number of trucks should consider a queuing time slot system.
* Use a gatehouse to control traffic time slots.
* Provide separate areas for tarping, load restraint, load splitting, maintenance and clean down.
* Provide separate entry and exit points for large vehicles.
* How can I keep people safe from powered mobile plant?
* Use signs to give advance warning to pedestrians and plant operators and to indicate who must give way.
* Isolate pallet racking aisles.
* Implement procedures setting out when and how mobile plant operators must give way to pedestrians.
* Implement systems of work to prevent forward carrying of loads if they obstruct the operator’s view.
* Minimise the number of mobile plant working at one time.
* Use speed-limiting devices and implementing speed limits.
* Use a combination of audio and visual warning devices like alarms, horns and flashing lights and ensure these are working when the plant is operating.
* Provide high-visibility or reflective clothing for workers and plant operators and high visibility markings for mobile plant.

**Note:** Certain types of plant like forklifts and some types of cranes require the operator to have a high risk work license before they can operate plant. See OHS Regulations for the classes of high risk work licenses and types of plant involved.

How can parking areas be managed safely?

* Set out parking areas so they are easy to drive in, out of and around in e.g. try to avoid the need for reversing and consider how large vehicles will be able to use the space safely.
* Use devices like speed humps to slow vehicles down.
* Prevent parked vehicles from rolling by parking them on level ground, preferably in a designated parking area with the brake firmly applied. Where this is not possible consider installing wheel humps in parking areas to prevent vehicles rolling away.
* Turn the wheels of the vehicle towards a safe stopping place like a curb or a wall so the vehicle or equipment does not accidently roll away.
* Chock the wheels of parked mobile plant.
* Avoid parking smaller vehicles behind large ones or in areas where the driver does not have clear visibility of the vehicle.
* How can I keep people safe from reversing vehicles?
* Ensure reversing sensors, reversing cameras, rear vision mirrors, fixed safety mirrors and windscreens are kept clean and in working order.
* Use radios and other communication systems.
* Fix mirrors at blind corners e.g. convex mirrors.
* Fit refractive lenses on rear windows to help drivers see ‘blind spots’.
* Ensure visiting drivers are familiar with workplace routes and reversing areas.
* What can I do to make sure vehicles are safe?
* Select vehicles and powered mobile plant which are suitable for the tasks.
* Ensure vehicles are fitted with seatbelts and parking brakes.

Forms / Records

Site specific Traffic Management Plan

# CHEMICAL MANAGEMENT

Introduction

Hazardous Substances and Dangerous Goods are chemicals that have the potential to harm the health and safety of any person in the workplace. This procedure will help to ensure that all relevant workers are informed about the chemicals and exposures to prevent disease and injury to the workers involved in using any hazardous chemical.

Examples of chemicals that Manhari Metals could be exposed to include:

* Coolants
* Fuels (Petrol & LPG), oils and lubricants
* Metalworking Fluids (MWF)
* Gas cylinders (LPG, cutting gas)
* Batteries
* Vehicle refrigerants
* Dust generated from loading and unloading of scrap, breaking, shredding and cutting of metals
* Fumes from hot processes (e.g. torching and hot cutting).

Safety Data Sheets and Registers

Manhari Metals will maintain a current Safety Data Sheet (SDS) issued within the last five years for all chemicals to be used. Before a chemical is used for a work activity, Manhari Metals will review the SDS to determine if the chemical is classified as hazardous.

All workers involved in the use of chemicals classified as hazardous will be provided with information and training to allow safe completion of the required task. No chemicals will be brought to the workplace without a current SDS. Copies of the SDS will be kept in the area where the chemical is used and also at the office.

Management will maintain the **Register of Hazardous Chemicals** for all chemicals used by Manhari Metals and provide notification to the regulator of any manifest quantities if required.

Safety Data Sheets and the GHS

Since 2012 Australia has transitioned to the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), an international system used to classify and communicate chemical hazards.

The GHS is a system used to classify and communicate chemical hazards using internationally consistent terms and information on chemical labels and Safety Data Sheets.

Manufacturers, Importers and Suppliers

Health and safety laws impose a duty on manufacturers and importers of chemicals supplied to a workplace to determine if a chemical is hazardous and to correctly classify the chemical according to the GHS. Manufacturers and importers are also responsible for ensuring that correct labels and SDS are prepared for hazardous chemicals.

Suppliers may continue to supply other workplaces with stock they have on hand after 1 January 2017 providing it was manufactured or imported prior to this date and correctly labelled at that time. From 1 January 2017 suppliers should only accept stock with GHS compliant labels. Suppliers will also need to have GHS compliant SDS available from this date.

Identifying Hazardous Chemical Risks

The manufacturers’ SDS and labels of all chemicals will be checked prior to use to determine whether the chemical is either hazardous or dangerous, or both. Likewise, the risks associated with storing hazardous chemicals will be considered.

Assessing Hazardous Chemical Risks

As part of the risk management approach, Manhari Metals has an obligation to ensure that any chemicals that pose a risk of injury to workers are assessed to determine the seriousness of these hazards.

In assessing risks arising from chemicals, the following factors will be taken into account:

* The nature of the chemical
* The label and/or a current SDS for the chemical
* The uses of the chemical
* The storage of the chemical
* The potential for exposure to the chemical, including through direct skin contact, inhalation, etc.

Risk assessment is documented in the Chemical Register. Chemicals that are rated as ‘High’ risks requires a Safe Work Procedure to be developed to handle.

Controlling Hazardous Chemical Risks

Manhari Metals will ensure, as far as reasonably practicable, that the risks associated with hazardous chemicals are controlled. The process of controlling hazardous chemical risks will be determined in consultation with workers.

If chemicals have been assessed as a risk, Manhari Metals will:

* Eliminate the chemical or task if it is not essential
* Substitute the hazardous chemical with something less hazardous
* Isolate the process by using barriers or distance
* Use engineering controls, such as local exhaust ventilation or automation of the process
* Minimise the volumes of hazardous chemicals used
* Establish safe work practices, such as restricting access to the area, keeping the area free of clutter, replacing lids on containers, safe storage and disposal of chemicals, being prepared for spills etc
* Provide spill containment systems such as spill kits or bunding appropriate to the type of chemical on site
* Ensure that the prescribed signage is in place to inform workers, visitors and emergency personnel of the type of hazard
* Provide instruction and supervision appropriate to the level of expertise of the worker involved
* Provide PPE such as gloves, safety glasses etc as a secondary measure to supplement the other controls outlined above.

Storage of Hazardous Chemicals

Manhari Metals will determine safe storage requirements for hazardous chemicals in conjunction with the SDS and the risk assessment. In storing hazardous chemicals, Manhari Metals will ensure that:

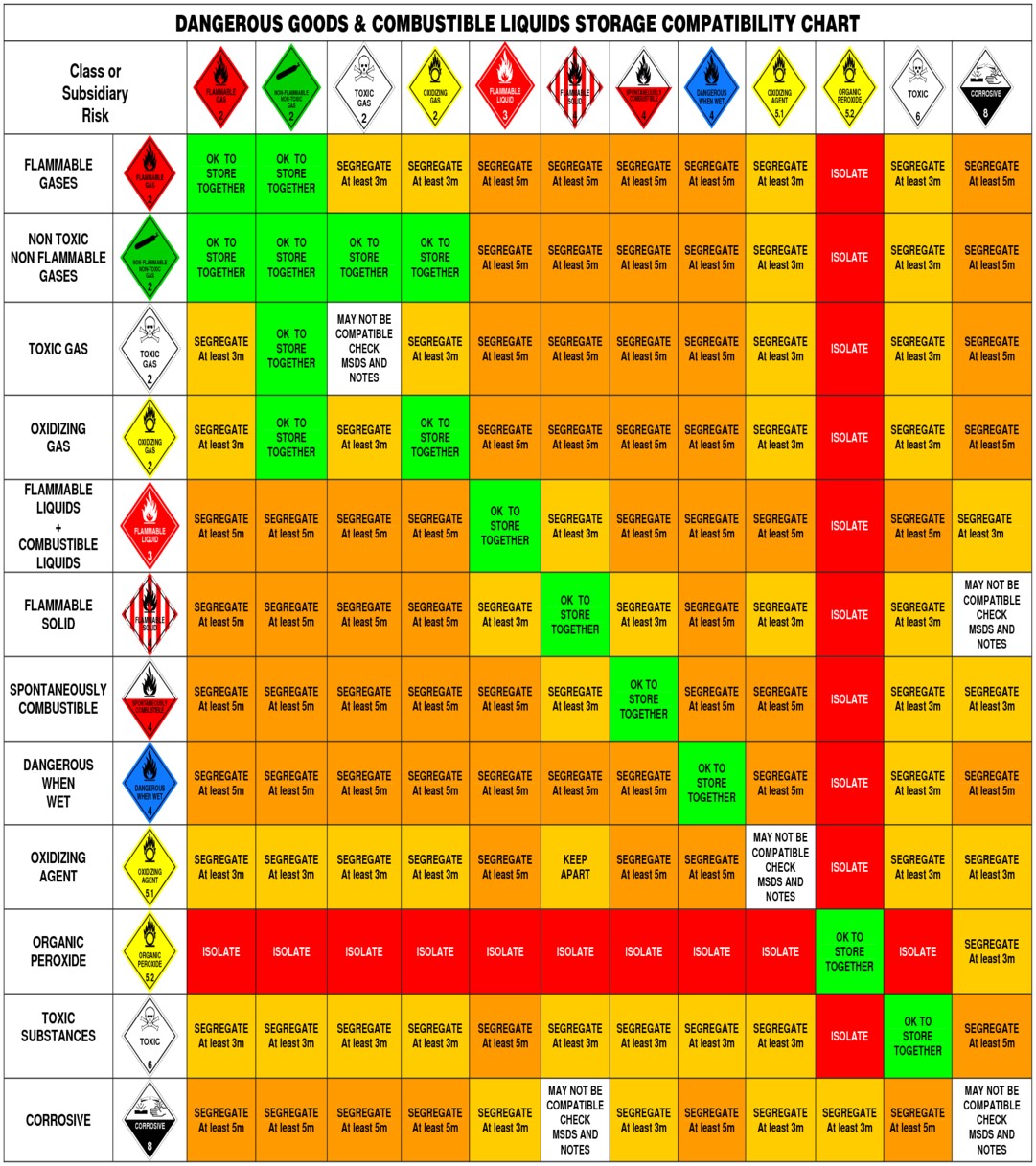
* Incompatible hazardous chemicals are stored at the appropriate separation distances
* Placards and signage are located on the outside of storage areas and site perimeters as required by the relevant health and safety laws and/or Australian Standards
* Appropriate fire protection and other emergency equipment are provided (for example, first aid equipment, emergency eye wash and safety showers)
* Adequate lighting and ventilation and temperature control is provided in areas where hazardous chemicals are stored and/or decanted
* Hazardous chemicals are not used or stored in proximity to any water or where they can potentially be released to water, such as via storm water drains
* All containers of hazardous chemicals are in good condition with no damage/corrosion or leaking contents wherever possible, hazardous chemicals will be stored in their original containers, labelled as supplied.

When transferring chemicals or keeping them in other containers, these new containers must be compatible, suitable for the purpose and labelled. Containers, lids, caps and seals will be checked regularly for deterioration and containers replaced when necessary. Food and drink containers will not be used to store hazardous chemicals under any circumstances

Storage requirements for the specific hazardous chemicals will be detailed in the risk assessment.

Some hazardous chemicals may also fall into the classification of dangerous goods and may be subject to requirements under the Australian Code for the Transport of Dangerous goods by Road and Rail.

Manhari Metals will ensure it is aware of any specific requirements of the Environmental Protection Authority relevant to any hazardous chemicals held on site or used in the conduct of its business.



Labelling of Hazardous Chemicals

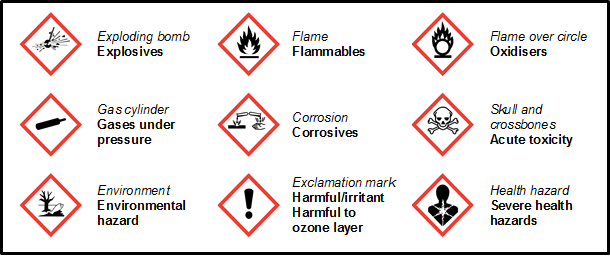
Since 2012 Australia has transitioned to the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), an international system used to classify and communicate chemical hazards.

The GHS is a system used to classify and communicate chemical hazards using internationally consistent terms and information on chemical labels and Material Safety Data Sheets. The GHS provides criteria for the classification of physical hazards (e.g. flammable liquids) health hazards (e.g. carcinogens) environmental hazards (e.g. aquatic toxicity).

The GHS updates the way in which information about chemical hazards is communicated to ensure safe storage, handling and disposal. The GHS uses pictograms, signal words, and hazard and precautionary statements to communicate this information.

Pictograms

There are nine hazard pictograms in the GHS which represent the physical, health and environmental hazards.



Signal Words

The GHS uses ‘Danger’ and ‘Warning’ as signal words to indicate the relative level of severity of a hazard. ‘Danger’ is used for the more severe or a significant hazard, while ‘Warning’ is used for the less severe hazards.

Hazard and Precautionary Statements

Hazard statements are assigned to a class and category that describes the nature of the hazards of a chemical, including, where appropriate, the degree of hazard. For example, the hazard statement ’Toxic if swallowed’ is the hazard statement for Acute toxicity category 3 (Oral).

Precautionary statements describe the recommended measures that should be taken to minimise or prevent adverse effects resulting from exposure, or improper storage or handling of a hazardous chemical.

Hazard and precautionary statements replace the ‘risk’ and ‘safety’ phrases required under previous laws.

Responsibilities under the GHS

Manufacturers, importers and suppliers. Health and safety laws impose a duty on manufacturers and importers of chemicals supplied to a workplace to determine if a chemical is hazardous and to correctly classify the chemical according to the GHS. Manufacturers and importers are also responsible for ensuring that correct labels and MSDS are prepared for hazardous chemicals.

Suppliers may continue to supply other workplaces with stock they have on hand after 1 January 2017 providing it was manufactured or imported prior to this date and correctly labelled at that time. From 1 January 2017 suppliers should only accept stock with GHS compliant labels. Suppliers will also need to have GHS compliant SDS available from this date.

End users of hazardous chemicals. Users of hazardous chemicals are not required to relabel or dispose of existing stock. Hazardous chemicals manufactured or imported after 1 January 2017 must only be received if they are labelled according to the requirements of the applicable health and safety regulations.

Decanting and Labelling

Manhari Metals will ensure that any hazardous chemical decanted at the workplace is decanted into a container which is correctly labelled. The following will be displayed on the label as a minimum:

* the product identifier
* a hazard pictogram or hazard statement consistent with the correct classification of the hazardous chemical.

In addition to the information listed above, the Organisation will aim to provide as much information on the label as possible, pertaining to hazards and safe use of the hazardous chemical.

Records /Forms

Chemical Register

Safe Work Procedures

# HEALTH MONITORING

There are many tasks undertaken by Manhari Metals that may expose employees and contractors to hazardous substances.

**Health monitoring:** Monitoring of a person to identify changes in the person’s health status because of exposure to certain substances or hazards.

Examples of hazardous chemicals that Manhari Metals employees that maybe exposed to include:

|  |  |
| --- | --- |
| **Task** | **Hazard** |
| Loading and unloading of scrap metals that generates dust | Depends on the metal type, employees may be exposed to many heavy metals. |
| Cutting apart pieces of metal scrap with gas torches  Cutting, shredding scrap coating with cadmium-containing paints | Cadmium |
| Cutting, shredding scrap coating with chromium-containing paints | Chromium |
| Handling batteries  Sorting lead | Lead |
| Grind or cut copper metal | Copper |
| Welding | Welding fumes / gas |

Health monitoring may also be required for Manganese, Molybdenum, Vanadium and Zinc.

The Manager shall engage a Medical Practitioner to determine to risk assess the site and determine whether Health Monitoring is required. If required, the health monitoring shall then be documented in a Health Monitoring Matrix. The Health monitoring matrix shall define:

* Type of health monitoring (e.g. interview questions, medical examination, biological monitoring)
* Frequency of health monitoring
* Health monitoring providers
* The process for responding to health monitoring reports.

Hearing Protection

When hearing protection is worn, all workers who wear such protection shall have their hearing tested within 3 months of commencing employment and every 2 years of continuous employment thereafter.

A written record of the hearing tests shall be maintained by Manhari Metals for each affected worker.

Records shall be maintained by Manhari Metals for 30 years after the person ceases to be employed.

# ATMOSPHERIC MONITORING

Atmospheric monitoring involves the use of suitable and valid sampling and analytical techniques to obtain an estimate of the level of airborne contaminants (dusts from shredding, breaking, loading and unloading). The results of the monitoring are then compared with the relevant Safe Work Australia exposure standards to determine if an employee’s exposure to substances is excessive.

The Manager shall engage an Occupational Hygienist to risk assess the operations and determine whether atmospheric monitoring is required.

Examples of hazardous chemicals that Manhari Metals employees that maybe exposed to include:

|  |  |
| --- | --- |
| **Task** | **Hazard** |
| Loading and unloading of scrap metals that generates dust | Depends on the metal type, employees may be exposed to many heavy metals. |
| Cutting apart pieces of metal scrap with gas torches  Cutting, shredding scrap coating with cadmium-containing paints | Cadmium |
| Cutting, shredding scrap coating with chromium-containing paints | Chromium |
| Handling batteries | Lead |
| Grind or cut copper metal | Copper |

Atmospheric monitoring may also be required for Manganese, Molybdenum, Vanadium and Zinc.

If there is uncertainty that the exposure standard may be exceeded, then atmospheric monitoring shall be undertaken by the Occupational Hygienist.

Results of atmospheric monitoring shall be provided to all employees on whom personal monitoring was conducted. Records shall be kept for 30 years.

Note: atmospheric monitoring is not required for a hazardous substance if health monitoring is determined to be required and it includes biological monitoring.

# CONTRACTOR MANAGEMENT

Introduction

Contract workers that are engaged directly by Manhari Metals in core business functions and under the direct control of Manhari Metals are owed all the same duties and responsibilities for safety as for any other worker.

When Manhari Metals engages contractors in a 'contract for service' (workers are employed by another organisation), it is important to determine the health and safety responsibilities of both parties.

The selection process for a contractor will determine whether the contractor (or sub-contractor) is able to meet Manhari Metals’ safety expectations and ensure the well-being of workers that may be required to work with, or around the contractor/s during the normal course of their duties, members of the public, others at the place of work any other infrastructure or aspects of the worksite.

Manhari Metals’ Responsibilities

Manhari Metals has a duty to ensure, so far as reasonably practicable, the health, safety and welfare at work of all its workers. It is responsible to ensure that the contractor supplies a Safe Work Method Statements (SWMS) or equivalent template for the following activities:

* Confined space entry
* Demolition works
* Hazardous manual handling
* Hot works
* Powered mobile plant (e.g. forklift)
* Removal or disturbance of asbestos
* Temporary supports for structural alterations
* Tilt-up or precast concrete.
* Trenches or shafts deeper than one and half metres
* Use of Hazardous Substances and Dangerous Goods
* Working at height (two metres or more)
* Lifting materials with a crane
* Work that is in, on or near:
  + electrical installations or services
  + pressurised gas distribution mains or piping
  + roads
  + telecommunications towers
  + water / liquids that pose a drowning risk.

If the proposed work requires a SWMS, the works cannot proceed until the Manager / Supervisor / Site Manager has reviewed and signed the SWMS, to verify it has been sighted. The Manager / Supervisor / Site Manager shall use the Contractor Hazard Identification and Control Guide to assess the quality of the SWMS. A new SWMS will be required if scope of works change. The Manager / Supervisor / Site Manager shall retain a copy of the completed SWMS.

All contractual arrangements to engage contractors stipulates that safety performance is a condition of engagement and that their performance will be monitored and evaluated as follows:

* Prospective contractors are provided with sufficient information during the tendering/application process to enable them to respond to any and all identified hazards associated with the scope of work to be performed.
* Effective evaluation of any documentation required and provided as prequalification will be used as a selection criteria for the engagement of contractors.
* Access to the proposed worksite to allow contractors to undertake specific hazard identification, risk assessment and development of Safe Work Method Statements (SWMS) or equivalent safety procedures before work commences.
* Evaluation of any and all Safe Work Method Statements or safety procedures created by contractors for accuracy and appropriateness.
* That an appropriate corrective action plan is developed and issued to the contractor, or their representative, whenever contractor safety issues are raised on site.
* That any work activity or unsafe work practice undertaken by the contractor, or their representative, is ceased immediately if any individual is placed in an immediate risk. The work activity will not resume until the issue is resolved.
* Manager / Supervisor shall induct the contractors using the **Contractor Induction Checklist**.

Contractor’s Responsibilities

The Contractor and/or sub-contractor must:

* Carry out a site safety assessment in relation to all proposed works.
* Undertake all contracted works safely and manage the risk of harm to persons or property.
* Ensure that all statutory requirements that requires a person to be authorised, licensed, supervised or to have prescribed qualifications or experience are met and be able to produce evidence of the same to the principal contractor if requested, prior to the contractors (or sub-contractors) work commencing.
* Ensure that all statutory requirements for the licensing, approvals and/or authorisation of any plant, substance, design or work (or class of work) are met and be able to produce evidence of the same to the head contractor if requested prior to the contractors (or sub-contractors) work commencing.
* Develop, implement and maintain a suitable and appropriate emergency management procedures relevant to the proposed contracted works.
* If requested by the Head Contractor (Principal), produce evidence of any approvals including any authorisations, licences, prescribed qualifications or experience, or any other information relevant to health and safety (as the case may be) to the satisfaction of the Head Contractor (Principal) before the Contractor or any sub-contractor commences any works.
* Generally, comply with the requirements of all safety legislation (or any other legislation that may apply).

Worker’s Responsibilities

When managing or supervising contractors you are responsible to ensure that you:

* Are familiar with the contents of the contractors Safe Work Method Statement (SWMS) or Job Safety Analysis (JSA).
* Undertake monitoring activities as per the agreed schedule.
* Contractors maintain their inspection and review schedules.
* Report any safety observations to management.
* Take immediate action to halt any work being undertaken by contractors that is unsafe and poses an immediate threat to the safety and wellbeing of any persons.
* Provide an evaluation of the contractors safety performance to management at the conclusion of the contracted works.
* Demonstrate positive safety behaviours and compliance with the organisation’s safety arrangements and instructions.

# MOTOR VEHICLES

Introduction

Operating motor vehicles is a normal part of Manhari Metals’ activities. Where travelling in the course of duties, the motor vehicle is considered to be a workplace and Manhari Metals recognises it has health and safety obligations in respect of this. Risks associated with operating a motor vehicle in the workplace will be addressed via a risk management approach.

Identifying Motor Vehicle Hazards

Motor vehicle hazards can be identified by:

* Reviewing the tasks associated with motor vehicles
* Observing how workers perform their tasks
* Reviewing any documentation regarding use that is provided by the motor vehicle manufacturer or that is otherwise available
* Checking workplace specific documentation regarding the motor vehicle, for example pre-start checklists
* Consulting with the workers carrying out the tasks.

Assessing Motor Vehicle Hazards

As part of the risk management approach, Manhari Metals has an obligation to ensure that any motor vehicle operations that pose a risk of injury to workers are assessed to determine the seriousness of these hazards.

In assessing risks arising from motor vehicles, the following factors should be taken into account:

* The size, type and condition of motor vehicles in use
* The licensing requirements for motor vehicle use
* The distances and recommended driving times of trips
* Loading and restraining of loads
* Road and traffic conditions
* Services and amenities on route for refuelling, rest breaks, break downs and emergencies.

In addition, any legislative requirements regarding the use of the motor vehicle (including prescribed work, rest, driver fatigue and work diary requirements) will be considered.

Controlling Motor Vehicle Risks

Manhari Metals will ensure, as far as reasonably practicable, that the risks associated with motor vehicles in the workplace are controlled. The process of controlling motor vehicle risks will be determined in consultation with the workers who are required to carry out the task.

Only authorised persons will be permitted to operate Manhari Metals’ motor vehicles. Manhari Metals will put in place systems to ensure that authorised persons are appropriately licensed to drive such motor vehicles, and that the motor vehicles being driven are registered and insured in accordance with the relevant legislation. Photocopies or other records of these checks will be retained.

In the event that motor vehicle operations have been assessed as a risk, Manhari Metals will:

* Comply with any legislative requirements relating to the use or operation of motor vehicles, for example by scheduling trips to ensure that prescribed work, rest, driver fatigue and work diary requirements are adhered to and ensuring workers have the appropriate licences, certificates and training to operate the motor vehicle. Details of this will be recorded in the **Skills Matrix**
* Ensure that workers are aware of and adhere to trip schedules
* Ensure that the motor vehicle is appropriate for the task
* Ensure that drivers are familiar with the motor vehicle they are required to operate and the safe operation of it
* Ensure that the motor vehicle is inspected, tested and maintained in accordance with the manufacturer’s requirements
* Provide mechanical aids where possible to reduce manual handling tasks associated with motor vehicle operations, or otherwise train workers on appropriate manual handling techniques (in particular when loading/unloading the vehicle) and safe operating loads
* Provide instruction and training to workers on this policy and associated procedures.

# SAFE DRIVING (NOT YET FINISHED)

Introduction

A number of roles within Manahri Metals require workers to drive company owned vehicles. The driving of vehicles are governed by the Road Rules to

Purpose

This Safe System of Work (SSOW) refers to the framework ongoing implementation of the management of Manhari Metals’ operations to ensure the safety of all personnel when performing their day to day operations.

Responsibilities

Management

It is the responsibility that management:

* Have ensured all tasks performed by Manhari personnel have been risk managed to ensure, as best as practicable possible, risks have been identified and, as a preference, eliminated, or if elimination is not possible, than reduced to an acceptable level.
* Have provided relevant and adequate training to workers to enable them to perform the tasks required of them in a safe and efficient manner.
* Monitor the workforce to ensure they are performing their tasks in accordance with their training.

Employees

It is the responsibility of employees to:

* Ensure they do not perform any task unless they have first completed training in the safe operation of the task
* Perform their tasks as per their training.
* Report any non-adherence to protocols to their supervisor as soon as is reasonably practicable.

Safe Driving Rules

* Perform all vehicle pre checks at the start of the day.
* Ensure the vehicle is free from loose items in the cabin when driving.
* Drive in accordance with the road laws at all times.
* Ensure the vehicle you are driving has
* Mass management
* Load restraints
* Fatigue management

# PLANT AND EQUIPMENT

Introduction

Plant is any machinery, equipment, appliance, implement or tool and any component or fitting used within the workplace.

Plant is machinery that processes material by way of a mechanical action which:

* Cuts, drills, punches or grinds
* Presses forms, hammers, joins, or moulds material
* Combines, mixes, sorts, packages, assembles, knits or weaves material.

Plant also includes lifts, cranes, tractors, earth moving equipment, pressure equipment, hoists, powered mobile plant, plant that lifts or moves people or materials, chisels, chainsaws, photocopiers, desks, filing cabinets and temporary access equipment.

Risks associated with plant and equipment in the workplace will be addressed via a risk management approach.

Identifying Plant and Equipment Hazards

Hazard means the potential to cause injury or illness. Examples of potential harm that plant or associated systems of work may cause to people at work include, but are not limited to:

* Injury from entanglement
* Crushing by falling or moving objects, or plant tipping over
* Crushing from people falling off or under plant
* Cutting or piercing due to sharp or flying objects
* Burns (friction, heat, chemical)
* Injury from high-pressure fluids
* Injury from electricity
* Injury from explosion
* Slips trips and falls
* Suffocation
* Ergonomic requirements
* Dust, vibration, noise, or radiation.

Assessing Plant and Equipment Hazards

As part of the risk management approach, Manhari Metals has an obligation to ensure that any plant or equipment that may pose a risk of injury to workers is assessed to determine the seriousness of these hazards.

When assessing potential risks and hazards associated with specific plant and equipment considerations should be given to the following throughout the life of the plant:

* Design and construction
* Installation or erection and positioning plant in the workplace
* Commissioning and operation
* Electrical, radiation and thermal energy
* Emergency procedures
* Hazardous substances and dangerous goods
* Machine guarding for plant with moving parts
* Maintenance, repairs, servicing and cleaning requirements
* Manual handling issues
* Noise and vibration
* Personal Protective Equipment requirements
* Work environment including lighting, ventilation, interaction with others
* Safe work procedures and auditing
* Decommissioning, demolition and disposal of plant
* The relevant Australian and international standards.

The manager shall identify the hazards for each plant using the **Plant Risk Assessment Tool**.

Controlling Plant and Equipment Hazards

Manhari Metals will ensure, as far as reasonably practicable, that the risks associated with plant and equipment are controlled from purchase through to disposal.

Registering Plant

Manhari Metals shall register the plant, where required by law. For example, air receivers (that are used that has a hazard level of A, B or C) vehicle hoists, mobile cranes (with rated capacity greater than 10 tonnes) must be registered.

Installation, Erection and Commissioning

Commissioning is a process of verification. This involves an extensive check carried out during the trial phase, prior to the plant being accepted for use. It ensures that the plant performs according to the design criteria and is a process, agreed to by the manufacturer or supplier. The extent and complexity of the commissioning will vary between items of plant.

Plant installation, erection and commissioning must be performed by a competent person who has access to any necessary health and safety information, including any instructions from the designer or manufacturer.

Commissioning methods should:

* Be in accordance with the manufacturer’s/supplier’s specifications
* Not impose stresses which exceed the limitations of design capabilities include tests to ensure that the plant will perform to its design specifications
* Include typical maintenance checks used by the operator and service personnel
* Be documented
* Ensure the location is suitable for the type of plant and provide sufficient clear space for the plant to be operated, maintained and repaired safely.

The results of the commissioning should include:

* Information about any problems identified during commissioning that suggest the plant cannot be operated safely
* Confirmation that the plant will perform the task for which it has been purchased.

Specified High Risk Plant needs to be assessed if there is a requirement for the plant to be registered.

Usage and Competency

Manhari Metals may control a wide variety of plant and equipment in the workplace with workers performing a range of activities and tasks with this equipment. To ensure these activities are conducted in a safe manner, the following processes should be adopted:

* Workers must only use plant when it is capable of performing safely within the design criteria and manufacturer’s instructions
* Workers are to be appropriately trained to use/operate the plant and equipment in a safe manner
* Specific work instructions will be developed for the operation of each piece of plant and equipment using the **Safe Work Procedure Form**.
* Machine operators shall be inducted on SWPs and signed off prior to operating machines unsupervised.
* Safe Work Procedures signed off by operators shall be displayed next to the machine.
* Maintenance and manufacturer’s manuals will be kept for all relevant plant and equipment
* Appropriate information that states the use for which the plant or equipment has been designed and tested and the conditions that must be followed to ensure the safe use of that plant, will be made available to workers
* Plant and plant equipment is to be used and maintained according to manufacturer’s guidelines, inspected and checked for any faults
* Items of heavy plant and machinery need to be checked regularly and recorded in a logbook (a daily pre-start checklist is required)
* Specific inspection checklists may need to be designed for items of plant, such as overhead cranes
* Any incident associated with plant or equipment will be reported to the person’s supervisors and they are required to complete an **Incident Report Form**
* Workers are to be advised of the reporting requirements through conducting a toolbox talk
* Supervisors are to regularly check if plant is being operated correctly.

Some plant and equipment and their use and operation are considered to be high risk work and as such any person who operates or uses the plant or equipment must hold a current National Certificate of Competency or recognised equivalent. Manhari Metals will maintain a register of licenced operators. Examples of high risk work include:

* Scaffolding
* Dogging and rigging
* Crane and hoist operation (tower cranes, self-erecting tower crane, derrick crane, portal boom cranes, bridge and gantry crane, vehicle loading crane, non-slewing mobile crane, slewing mobile cranes, materials hoist, personnel and materials hoist, boom-type elevating work platform, vehicle-mounted concrete placing boom)
* Forklift operation
* Pressure equipment operation (boilers, turbine, reciprocating steam engine operation)
* Load-shifting equipment (front-end loader/backhoe, front-end loader – skid steer type, excavator)
* Formwork
* Explosive-powered tools
* Operation of motor vehicles requiring the relevant driver’s licence.

Pre-start inspection

Operators shall undertake pre-start inspection prior everyday. The Manager shall develop a workplace inspection checklist for each plant / machine using the manufacturer instruction (Machine Operating Manual). Refer to **Forklift Pre-Start Checklist** for a sample.

Plant maintenance / service

The Manager shall ensure that all plant and equipment are regularly maintained and serviced. The Manager shall maintain a preventive maintenance schedule based on the manufacturer maintenance instructions.

The Manager shall maintain a register for all plant and equipment using **Assets Register**.

Modification of Plant

As part of the risk management approach, Manhari Metals will consider all safety issues when considering any alterations to plant and equipment, by:

* Consulting with the designer and manufacturer
* Where the original designer or manufacturer cannot be contacted, the alterations will be carried out by a competent person in accordance with the relevant technical standards.

A competent person is one who has acquired through training, qualification or experience the knowledge and skills to carry out the task.

Manhari Metals will, so far as is reasonably practicable:

* Ensure that the design and construction of the plant is such that persons who use the plant properly are not, in doing so, exposed to risks to their health and safety
* Ensure that adequate information is supplied about any dangers associated with the plant and about conditions necessary to ensure that persons using the plant properly are not exposed to risk to their health and safety.

Modifications to protective systems, such as drilling holes or welding, may destroy the integrity of the protective structure. Modifications will not be undertaken unless they have been assessed and specified by a competent person.

Decommissioning and Disposal

When decommissioning and planning for the disposal of plant, Manhari Metals will:

* Identify and control hazards involved in the process of decommissioning and dismantling the plant
* Dismantle plant in accordance with the designer’s and manufacturer’s instructions if available
* If re-selling, ensure that the plant is safe to load, transport, unload and store. Any available information relating to the plant design, registration, installation, operation and maintenance will be provided with the plant
* If scrapping, ensure that the plant is safe to load, transport, unload and dispose of/or inform the receiver of the scrap or spare parts (in writing) that they are not to be used as plant in their present form.

# ISOLTAION AND TAG OUT

Purpose

The purpose of this procedure is to ensure all unsafe plant and equipment are identified and removed from service. This includes isolation and tag out of plant and equipment prior to maintenance, inspection, cleaning or repairs.

Scope

This procedure applies to all Manhari Metals assets, powered mobile plant, vehicles, forklifts, excavators, static machinery, hand held or portable electrical equipment whether including any of this equipment being used off site.

Responsibilities

The Manager and/or Compliance Officer are responsible for:

* Identifying all plant and equipment within the workplace to which the Isolation and Tag Out Procedure is applicable to
* Arranging for repairs and/or maintenance of items of equipment or plant that are out of service
* Ensuring records are maintained for plant and equipment that is isolated and tagged out

The Employees are responsible for

* Reporting any plant and equipment hazards or faults to their immediate manager
* Participating in routine visual checks of plant and equipment

Contractors are responsible for

* Isolating plant and equipment, affixing the required lock and completed tag and completing the Tag Out Register

Procedure

Isolation

In the event that plant and equipment is identified as being unsafe, the plant and equipment item must be switched off and disconnected from any energy source (e.g. power supply, gas cylinders etc) and removed from service.

The Manager and/or Compliance Officer are to be notified immediately and are to take the necessary steps to ensure that the plant and equipment is appropriately isolated and removed from any power source and removed from service.

Examples of unsafe plant and equipment may include:

* Electrical lead insulation that is pulled away from the plug, exposing wires
* Electrical plant or equipment that does not start/stop when switched on and connected to a power source
* Signs of excessive damage and/or wear and tear, e.g. exposed wires, missing guards, signs of scorching
* Rusted or damage gas fittings

Items of plant and equipment requiring repairs or maintenance work must also be isolated from energy sources prior to work commencing

Methods of isolation for a non-electrical system:

* Installing mechanical stops or retaining pins capable of being padlocked
* Physically blocking the system against movement
* Bleeding residual gasses, liquids and vapours from systems

Methods of isolation for an electrical system

* Removal of fuses
* Isolation of the drive motor at the source
* Isolation of the control panel
* Complete removal of power/cable/plug from plant or equipment
* locking out the power supply board

Tag Out

Once plant and equipment has been isolated, a tag indicating that the item is “Out of Service” should then be placed onto all on/off switches and power leads.

The “Out of Service” tag must be left on faulty items until the fault has been rectified or the tag is replaced with a “Danger – Do Not Operate” tag and/or lock by a contractor or other person authorised to rectify the fault. The tag is to indicate the reason for the plant or equipment being isolated, who the tag was completed by and the date it was completed.

The Manager and/or Compliance Officer must ensure that only a competent person is permitted to repair the plant or equipment and remove the “Out of Service” or “Danger- do not Operate” tags and/or locks.

Maintaining Records

A record must be kept of dates, times and names of employees/contractors isolating and tagging of plant and equipment in the Tag Out Register or equivalent.

# TESTING AND TAGGING OF ELECTRICAL EQUIPMENT

Purpose

The purpose of this procedure is to ensure that electrical equipment being used within Manhari Metals workplaces is tested and tagged to reduce the risk of property damage and personal injury.

Scope

This procedure applies to all electrical equipment used at Manhari Metals workplaces including off site. Electrical equipment is defined as any item within the workplace that either is or has the ability to be connected to a source of electricity such as mains power, battery power or generated power, i.e. solar, fuel generated.

Responsibilities

Manager and/or Compliance Officer

* Ensuring all electrical equipment is identified, regularly inspected and tested in accordance with the recommendations of AS/NZS 3760:2010 In-Service Safety Inspection and Testing of Electrical Equipment;
* Ensuring that maintenance work of electrical equipment is conducted in accordance with this procedure;
* Ensuring records of electrical equipment testing and inspections are maintained in the workplace.

Employees

* Notifying their manager or Compliance Officer of any hazards identified in relation to the use of electrical equipment;
* Participating in routine visual checks of electrical equipment

Procedure

Identifying Electrical Equipment

The Manager and/or Compliance Officer in consultation with employees are to ensure that all items of electrical equipment in the workplace are identified and recorded on the Assets Register

Electrical Equipment may be identified as a result of:

* An inspection of all areas within the workplace (e.g workshops, offices, maintenance sheds etc)
* The introduction of new plant or equipment
* An incident, injury or hazard reported in the workplace

If an employee identifies an electrical equipment item as being unsafe, it is to be reported to the Compliance Officer or Supervisor and tagged out of service (see below).

Testing of Electrical Equipment

The Manager and/or the Compliance Officer are to ensure that electrical equipment is regularly inspected and recorded on the Electrical Equipment Register in accordance with AS/NZS 3760:2010. Once tested, a tag should be attached to the cord of the equipment indicating whether it has passed or failed, the date of the test and the date that it is next due to be tested.   
As a minimum requirement, a person undertaking the task of testing and tagging of electrical equipment must have successfully completed the nationally recognised unit of competency, UEENEEP008B Conduct in-service safety testing of electrical cord assemblies and cord connected equipment, or the equivalent.

Determine Testing Frequency

The Manager and/or Compliance Officer should determine the electrical equipment testing frequency (in accordance with table 4 in AS/NZS 3760:2010). The testing frequency is to be recorded on the Electrical Equipment Register.

The following frequencies will apply to Manhari Metals electrical equipment;

* Power tools (grinders, drills, etc) 3 monthly
* Extension leads 3 monthly
* Portable electrical equipment (welders) 6 monthly
* Static machinery (shredder, baler etc) 6 monthly
* Kitchen equipment (microwave etc) annual
* Office equipment (printers, copiers etc) 5 yearly

Purchasing New Electrical Equipment

The supplier is deemed responsible for the initial electrical safety of the equipment, however the Manager and/or Compliance Officer are responsible for ensuring that all new purchases meet relevant Australian Standards, have been checked for any obvious damage, have been tested and tagged after the applicable testing frequency period and that all relevant information has been recorded in the Electrical Equipment Register.

Introducing Electrical Equipment from outside the workplace

The Manager and/or Compliance Officer are responsible for ensuring all electrical equipment introduced from outside the workplace (e.g from home) is tested and tagged and recorded on the Electrical Equipment Register prior to being used in the workplace.

Isolation and Tag Out of Electrical Equipment

Where electrical equipment is identified as hazardous, the workplace Manager and/or Compliance Officer must attach and “out of service” tag, ensure the item is electrically isolated, and removed from service as per the Isolation and Tag Out Procedure. The manager or Compliance Officer are to ensure that only a competent person is permitted to repair the electrical equipment and removes the “Out of Service” tag.

Maintaining Records

It is the responsibility of the Manager and/or Compliance Officer to maintain records of all inspections and testing on the Assets Register.

A record must be kept of dates, times and names of employees/contractors isolating and tagging items of plant and equipment in the Isolation and Tag Out Register or equivalent.

# WORKING AT HEIGHTS

Introduction

Falls are a major cause of death and serious injury in Australian workplaces. Fall hazards are found in many workplaces where work is carried out at heights (for example, stacking shelves, working on a roof, or unloading a large truck). Fall hazards may also arise at ground level, for example trenches or service pits. Predominantly, fall hazards pose a risk to the individual worker, however hazards may also arise for workers on ground level where the risk of falling objects is a concern.

Any organisation performing work from heights using harness - fall arrest systems, Elevated Work Platforms, Scissor Lifts or Man Cage (Forklift) MUST have a rescue plan in place and all workers performing tasks must be trained in the plan. Risks associated with falls in the workplace will be addressed via a risk management approach.

Identifying Working at Heights Risks

Manhari Metals in consultation with workers, will identify working at heights risks in the workplace by:

* Reviewing tasks that are carried out, including those that are carried out:
* on plant or structures at an elevated level or to gain access to an elevated level
* on or in the vicinity of an opening, void or fragile surface through which a person could fall (for example, cement sheeting roofs, rusty metal roofs, fibreglass sheeting roofs and skylights)
* on or in the vicinity of an edge over which a person could fall
* on or in the vicinity of a slippery, sloping or unstable surface
* on or in areas where there is restricted and or limited access
* on any structure or plant, including those being constructed, installed, demolished, dismantled, inspected, tested, repaired or cleaned
* Observing how workers perform their tasks
* Reviewing plant and equipment in the workplace and any documentation regarding the use of fall prevention, fall arrest and Personal Protective Equipment provided by the equipment manufacturer or that is otherwise available
* Checking workplace specific documentation regarding the work area or task
* Consulting with the workers carrying out the tasks
* Considering the risk of falling objects when working at heights.

Assessing Working at Heights Risks

When assessing the risks arising from working at heights, Manhari Metals will consider the following:

* The design and layout of elevated work areas, including the distance of a potential fall
* The number and movement of all people at the workplace
* The adequacy of inspection and maintenance of plant and equipment (for example, scaffolding)
* The adequacy of lighting for clear vision
* The nature of the work area and the potential impact of weather conditions, including rain, wind, extreme heat or cold
* The suitability of worker footwear and clothing for nature and location of work being performed
* The suitability and condition of any plant or equipment (for example, ladders) used to access heights or whilst working at heights, including where and how they are being used
* The level of knowledge of workers working at heights, and any training required to allow the worker to perform the task safely, particularly for young, new or inexperienced workers
* The adequacy of procedures for all potential emergency situations, and any amendments that may be required for workers working at heights:
* The proximity of Overhead Power Lines and the movement of workers, plant and equipment around the work site: and
* Work practices where goods, materials and tools must be carried whilst ascending or descending stairs ramps and walkways

In addition, Manhari Metals will consider the proximity of workers to elevated working areas (for example, loading docks) where loads are placed, and areas where work is carried out above people, to assess the risks associated with falling objects.

Controlling Working at Heights Risks

Manhari Metals will ensure, as far as reasonably practicable, that the risks of falls and falling objects associated with working at heights are controlled. The process of controlling these risks will be determined in consultation with workers.

In the event that falls and falling objects have been assessed as a risk, Manhari Metals will wherever practicable eliminate the need to work at heights by carrying out work on the ground or on a permanent structure that complies with legislative requirements.

Where the above controls are not practicable, Manhari Metals will do the following where necessary and reasonably practicable:

* Provide and maintain fall prevention devices (for example, guard rails)
* Provide a work positioning system (for example, an industrial rope access system)
* Provide a fall-arrest system, for example a harness
* Provide appropriate PPE (for example, gloves, footwear etc)
* Ensure that workers required to work at heights have any required licenses/certificates
* Provide task specific training to workers required to work at heights, for example on the use of fall arrest devices, elevated work platforms, scaffolds etc.

# UV PROTECTION POLICY

Introduction

The objective of this policy is to ensure a work environment for Manhari Metals employees that is safe from over-exposure to UV radiation.

The requirements of this policy shall apply to all employees working on Manhari Metals sites including any subcontractors and their employees

Responsibilities

The site supervisor shall ensure that UV radiation exposure to workers is assessed and minimized by adopting the following safe work procedures and practices as far as reasonably practicable:

* Re-organising the work to avoid the UV peak of the day (11 am – 3 pm during daylight saving times, 10am – 2 pm at other times);
* Providing natural or artificial shade.
* Wearing appropriate protective clothing i.e. long sleeve clothing, hats and sunglasses;
* Applying sunscreen to unprotected skin.

Identify tasks where over-exposure to UV radiation is likely. Where reasonably practicable and where works programming allows, re-organise or re-schedule tasks to minimize the associated risks of UV exposure to workers being outside during the middle of the day for long periods. For example, see if tasks can be carried out undercover. If tasks cannot be re-organised or re-scheduled, try to rotate workers to limit individual UV exposure.

Where reasonably practicable, use natural shade or install temporary shade structures that would provide good protection, such as shade screens or shade cloth.

Clothing suitable to the task shall be worn. Clothing should be loose fitting long sleeve shirts and trousers that cover as much skin as possible without the risk of heat stress. Where heat stress is likely, loose fitting elbow length and knee length type clothing may be used. Choose close-weave fabric with UPF 30+ or greater rated. Hats, hard hat flaps or legionnaire’s caps and sunglasses shall also be worn.

In conjunction with the above-mentioned control methods, exposed areas of skin shall be protected with SPF 30+ sunscreen and lip balm. The use of sunscreen shall not be a substitute for wearing appropriate clothing.

Where any doubt exists regarding this policy, the matter shall be determined by consultation between Manhari Metals and employees.

# PERSONAL PROTECTION EQUIPMENT (PPE)

Introduction

Exposure and injury can be prevented with the use of PPE where preventative measures for a hazard require additional control. Use of PPE is only to be considered when more effective control measures have been ruled out.

Hearing protection, eye protection, skin protection, respiratory protection and other personal protection can be achieved by wearing specific items developed to prevent injury.

Risks associated with PPE in the workplace will be addressed via a risk management approach.

Responsibilities

Manhari Metals’ Responsibilities

* Ensure they supply suitable PPE and protective clothing
* Ensure that PPE and protective clothing meets relevant legislative, Australian Standard and/or industry requirements or guidelines
* Ensure that information and training is provided in the correct use, wear and maintenance of PPE and protective clothing supplied
* Ensure tasks are assessed to determine correct level of PPE required
* Ensure that PPE and protective clothing being used are in an appropriate condition for the works being performed
* Replace damaged or worn PPE and protective clothing
* Ensure their employees wear and use such items supplied to them.

Worker’s Responsibilities

* Wear and use PPE and protective clothing provided as instructed
* Maintain and care for the PPE and protective clothing supplied
* Report damaged or worn PPE to your manager.

Determination of PPE and Protective Clothing

Determination of whether PPE and/or specific protective clothing are required will be based on a risk assessment of a hazard or task and, where relevant:

* Information contained in the SDS for chemicals and dangerous goods
* Operating procedures for plant,
* SWMS, and
* Safe operating or work procedures.

Selection of PPE and Protective Clothing

All PPE selected shall conform to the appropriate legislative, Australian Standard and/or industry requirements or guidelines. PPE supplied by Manhari Metals remains the property of Manhari Metals.

Before any PPE is used it should be inspected to ensure:

* A good fit on the user
* It is appropriate for the task and will protect the user from the hazards it is intended to control
* It does not introduce any new hazards
* Is in good condition
* The user understands the correct usage of the equipment.

If there are any defects or deficiencies found with the PPE after inspection it must be taken out of service immediately and reported to the manager

New products are continually being developed and made available this may mean an item that has been in use may be superseded and no longer available.

If new equipment requires selection, the most effective PPE should be chosen according to the risk assessment or SDS information.

Protection

Where defined by signage on plant, entrances to buildings/rooms or work sites all identified PPE must be worn.

Hearing protection shall be worn when persons are standing 1 metre apart and need to raise their voices over normal to be heard.

# WASTE MANAGEMENT

Introduction

Waste metals coming onto site will inevitably be contaminated with materials that are not accepted by Manhari Metals. In most cases, these materials will cost money to dispose of, however, in some cases, they can present a safety and/or an environmental risk

This procedure has been developed to detail the process of how Manhari Metals will deal with Prescribed Industrial Waste and other Unacceptable Scrap Material at all their premises. The procedure will define what is Prescribed Industrial Waste and what is otherwise unacceptable.

Prescribed Industrial Waste (PIW)

This relates to waste products that have been classified by law as requiring tracking from waste producer to a licenced facility by EPA Permitted vehicles. These wastes pose a hazard to human health and/or to the environment. Manhari Metals do not have Licensed facilities and so are unable to accept PIW’s.

Relevant PIW’s include (but not limited to):

* Architectural and decorative paint
* Electrical transformers containing oil that is contaminated with greater than 2ppm PCB’s
* Any liquid wastes
* Used oil filters
* Containers of any size that contain residues of any liquid or any other PIW

**Empty containers** (eg. 44 gallon drums etc) must be cleaned to allow them to be reused or recycled. As recyclers we can accept these containers only if we are satisfied that they have been cleaned as per the EPA requirements (triple washed).

Industrial Transformers - End-of-life industrial transformers containing oil with a PCB concentration of less than 2 mg/kg (PCB-free oil), declared as waste by the waste generator (‘waste’) and having been managed in accordance with the conditions of the EPA classification, are classified as non-prescribed industrial waste. For us to accept these transformers they need to be certified as having been treated as per the EPA requirements.

Other Unacceptable Scrap Material

Invariably some non-metallic material will be found in a lot of loads coming into our yards. Some of these materials will include demolition rubble such as bricks, concrete, dirt, wood but may also include rubber (including extra tyres) plastic, polystyrene, insulation, glass, paper and vegetation.

The acceptance of such material must be kept to an absolute minimum.

Procedure for Acceptance of Unacceptable Waste Metals

It is the responsibility of all staff members to be vigilant in detecting PIW or other unacceptable material being brought onto our sites. Visual checks of all loads so far as is possible should be conducted by forklift drivers and truck drivers. Upon being emptied, loads need to be checked by grab or excavator operators or by staff members in the vicinity.

If any of the following products are located in an emptied load, the following instructions apply:

Unclean drums or liquid chemicals

* If the identity of the chemical or substance in the drum can be ascertained, the relevant Safety Data Sheet (SDS) for correct handling procedures is to be sought and guidelines followed
* Closed containers are not to be opened
* Container to be placed into quarantine area away from heat/ignition sources and areas of high activity
* Appropriate PPE to be worn when handling containers
* Container to be stored in such a position that does not allow liquid to escape from the drum it is in

Gas cylinders or pressure vessels

* Gas cylinders are not to be placed into shredder mill
* Remove cylinders are to be placed into designated bin (quarantine area)
* Cylinders to be stored upright and restrained
* Supervisor to arrange for decommissioning

Ozone depleting substances

* Origins of ozone depleting substances can be found in commonly scrapped items such as air conditioners, fridges, freezers or fire extinguishers
* Where reasonable and practicable, customers may be required to certify that the refrigerant has been removed from the item prior to purchase

Asbestos

Although asbestos can only be identified under a microscope and can take various forms such as fibres, lagging, compressed seals, insulation, gaskets, brakes etc, any material that is potentially asbestos should be treated like it is asbestos. If any employee finds a product you think might contain asbestos:

* Any employee who finds a substance they believe to contain asbestos, they are to notify their supervisor immediately.
* If the quantity is above regulatory threshold (10 square metres non-friable asbestos) arrangements will be made for its removal by a licensed asbestos removalist
* Where less than regulatory threshold, employees are to wear appropriate PPE (e.g. gloves, face mask);
* Wet down material;
* Remove material from scrap using a tool where possible;
* Wrap material in plastic
* Arrange for disposal in accordance with local council guidelines.

In all cases of Prescribed Industrial Waste and other Unacceptable Scrap Material being detected, employees should try to identify the customer who sold it so they can be followed up by management.

Procedure for Waste Management

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| --- | --- | --- | --- | --- | --- |
| **Currently recycled/goes to landfill?** | **Type of Waste** | **Main Source of Waste** | **Separation Method** | **Collection/Disposal Method** | **Comments** |
| **Landfill** | **Rubber** | Old cars and trucks | Stockpiled in ferrous area | This must be disposed by a licenced waste management company | There is an opportunity to recycle hard plastic  refer to  businessrecycling.com.au |
| **Landfill** | **Plastic / PVC** | Electrical cables recycling | Stockpiled | This must be disposed by a licenced waste management company | There is an opportunity to recycle hard plastic  refer to  businessrecycling.com.au |
| **Landfill** | **Oil** | Plant maintenance / maintenance workshop | Waste oil containers | Must be disposed as. Keep copy of the Electronic Waste Transport Certificate (WTC) on the EPA Portal | There is an opportunity to recycle oil, refer to  businessrecycling.com.au |
| **Landfill** | **Sludge** | Shredder (Oil Tower) | Sludge container – Shredder | Must be disposed as priority waste (currently called Prescribed Industrial Waste). Keep copy of the Electronic Waste Transport Certificate (WTC) on the EPA Portal | Refer to IWRG822.3 Waste Codes- EPA for more information |
| **Landfill** | **Tyres** | Old cars & trucks | Tyres stockpile | Must be disposed by a licensed waste management company | There is an opportunity to recycle tyres |
| **Recycled** | **Commingle Items**  (Plastic & glass bottles, steel tins, milk cartons, jars, aluminium cans etc…) | Kitchens and Lunchrooms | Place into the yellow bin | Landfill bin |  |
| Recycled | Office Paper | Office | Place into the yellow bin | Recycling bin |  |
| Recycled | **E-Waste**  Light, globes, batteries, computers, televisions, mobile phones | Office | Place into blue bin | Disposed once a year at |  |
| Recycled | Empty toner and print ink cartridges | Printer | Place into bin specific for toner and print ink cartridges. | To be returned to Officeworks & Cannon |  |

# SCRAPPED MOTOR VEHICLES

Purpose

This procedure has been developed to detail the process of how Manhari Metals will deal with motor vehicles being scrapped at our facilities. The procedure details why we need to have a separate procedure to normal scrap metal, how we will deal with vehicles and who has responsibilities under this procedure.

Background

The risks associated with scrapping motor vehicles are varied however the most significant of these are around the introduction into the stockpile of a source of ignition (batteries), a source of combustion (fuel) and a source of explosion (gas tanks). In recent times it has also become highly prevalent for customers to load vehicles with rubbish, tyres and car interiors from other vehicles. This, if not managed, leads to an increase in combustible waste material being introduced into the stockpile creating a fire risk and a cost to the business in the lawful disposal of such items.

This procedure is designed to reduce the risk of fire through the introduction of scrapped motor vehicles and to reduce the amount of combustible waste material that makes its way into our stockpiles.

Procedure

When a vehicle or vehicles to be scrapped enter the yard, a staff member, either a member of the management team, a forklift driver not servicing another customer, a labourer or as a last resort, an excavator driver working at the stockpile must:

* Be in attendance in the vicinity of where the vehicle/s is to be unloaded and before it has been unloaded.
* Check to see if there is a battery/batteries present, whether there is a gas tank attached to the vehicle and whether there is excessive rubbish included in the load.
* Ensure only tyres attached to the vehicle will be accepted as part of the load.
* Ensure any batteries are removed from the vehicle once it has been unloaded.
* Decide on the level of contamination and decide if the contamination can stay with the vehicle subject to a deduction in the payable weight on the load or for the customer to take the rubbish away with them.

**MANHARI METALS NOT ACCEPT VEHICLES WITH FUEL TANKS ATTACHED UNLESS IT IS A COMPLETE VEHICLE.**

Once the vehicle/vehicles have been unloaded, the excavator driver is to turn the vehicles over, check for fuel tank and if present, use their grab to remove the petrol tanks which are then to be placed in an area away from the stock pile.

The vehicle is then ready for placement either in the shear (clean vehicles only) or the provided hook bin (vehicles containing interiors, tyres, plastic etc).

**VEHICLES ARE NOT TO BE PLACED IN THE STOCKPILE.**

# DUST MANAGEMENT

Purpose

Airborne dust reduces air quality and visibility and may have adverse effects on human health. The purpose of this plan is to reduce the amount dust that is generated from the operations at Manhari Metals from impacting on the health of personnel on site and from leaving the premises.

Responsibilities

Management

Responsibility and authority to ensure that the site environmental dust objectives are achieved. This includes:

* Ensuring staff are trained with respect to dust awareness, responsibilities, instructions and procedures.
* Ensuring dust emission incidents are investigated and corrective and preventative action taken.
* Ensuring operations comply with the conditions of relevant legislation.
* Reviewing operations and implementing strategies to reduce dust emissions from the works.
* Developing and implementing contingency plans as required to remedy dust emissions and minimise dust complaints.
* Ensuring periodic dust monitoring is carried out.
* Reviewing dust emission complaints received to determine if particular dust issues/trends are being identified.

Supervisors

Responsible for minimisation of dust emissions arising from work methods and the working environment. This includes:

* Identifying, reducing and preventing dust emissions.
* Monitoring operations and maintenance work to ensure dust emissions are maintained within approved levels.
* Initiating action to prevent dust incidents.
* Identifying, reporting and recording dust emission incidents.
* Approving any communications to external parties on dust generating activities before their release.
* Ensuring all personnel are aware of dust plan and other regulatory requirements relating to dust.
* Ensuring the availability of resources.
* Communicating the importance of the Dust Management Plan and meeting the statutory and regulatory requirements.
* Verifying the implementation of corrective and preventive actions.
* Recognising and responding to community concerns.

Employees

Responsible for ensuring that the dust issues for their work are minimised. This includes:

* Observing any dust emission standards and procedures that apply to their work or operations.
* Taking action to minimise or prevent dust emissions.
* Identifying and reporting dust emissions.
* Monitoring, reporting and assisting in the control of dust emissions to keep within approved levels.

Procedure

Materials Processing

The set up and operations of Materials Processing Plant must consider the following:

* The location of the plant within the site to minimise impacts from dust generation.
* Water sprays during the outdoor processing of metal scrap, including unloading from trucks, loading into plant, processing, processed material exit, creation of processed material stockpiles and loading of vehicles.
* Water sprays onto material during the unloading of vehicles/trucks including the surrounding, stockpiling and loading of trucks.
* Management of roads including the use of water sprays, dust suppression agents, minimising dust track out to sealed roads etc.
* Minimising dust from truck loads (such as covers, load wetting, etc).

Outdoor Stockpile Management

The generation of dust in outdoor storage may occur during transport to and from, unloading, construction, storing and extraction from the stockpiles. The following measures will be undertaken to minimise fugitive dust from stockpile areas:

* Where possible, consolidation of existing stockpiles to reduce their overall numbers and footprint.
* Truck speed restriction to 5km/hour in stockpile areas.
* Minimising of outdoor stockpile height, where the scrap metal and scrap etc is kept for recycling.
* Compaction of stockpile batters to minimise wind pick up of dust.
* Keep stockpile surfaces wet in dry weather and, where possible, installation of water sprays for stockpiles.
* In extreme weather circumstances, stockpile creation and extraction activities should be stopped until the weather changes.
* Progressive removal of stockpiles from high elevation areas to more appropriate low or below normal ground level areas e.g. to scrap metal storage areas.
* As best as possible, ensure stockpile rotation to reduce the accumulation of dust generating matter.
* Safe Work Method Statement (SWMS) must be prepared before the establishment of new stockpiles or significant handling/modification of existing stockpiles. At a minimum the SWMS should consider the following issues:
* Materials to be stockpiled;
* Location;
* Anticipated volume;
* Dust generating potential;
* Duration that the material is to be stockpiled; and
* Environmental risks impacts and controls.
* SWPs for stockpile management should also be developed and implemented to minimise the potential to generate airborne dust.
* The Compliance Manager shall be made aware prior to the commencing of any new activities or modifications to existing activities at the stockpiles which may result in generation of excessive dust or any other environmental impacts.

Operational Buildings

Operational buildings generally contain plant and machinery or are used for storage. The following activities will help to contain and minimise dust inside the buildings:

* Building doors/gates are to be kept closed/sealed to contain dust, as well as improve safety and visual amenity.
* Sweeping cleaning up of areas to be regularly maintained to provide effective de-dusting. They should be periodically inspected, and their maintenance planned in accordance with those inspections.
* Any excessive dust accumulated indoors to be regularly cleaned/removed.
* Dust spills and dust accumulated outside of buildings to be promptly removed.

# DOCUMENT MANAGEMENT PROCEDURE

MANHARI METALS shall establish its document management by the following -

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| --- | --- | --- | --- | --- | --- |
| **PURPOSE:** | | To establish which documents are controlled how they are approved and issued and the responsibilities for personnel. This procedure also defines how project records are managed. | | | |
| **SCOPE:** | | This procedure is limited to the MANHARI METALS HSEQ Quality Manual, associated procedures and forms, project records and relevant reference documents. | | | |
| **SAFETY & THE**  **ENVIRONMENT:** | | * Applies to all aspects of MANHARI METALS operations. | | | |
| **STEPS IN THE PROCEDURE** | | | **REFERENCES** | **RESPONSIBILITY** | **RECORDS** |
| **1** | List all controlled documents and update prior to the Management Review Meeting and whenever a document is added or changed | | Top management approves the HSEQ manual.  All other documents are approved by Top Management | Directors | * Controlled Documents Register |
| **2** | Each new document shall be provided with a unique title in a manner similar to this procedure. | | Compliance Manager | * Computer Files |
| **3** | The first issue of a document is Revision 1 and all superseded revisions are to be retained on the computer network and accessible. | | Compliance Manager | * Relevant Document |
| 4 | Reference documents are listed in the Controlled Documents Register. | | * Works and Project related | Administration | * Controlled Documents Register |
| 5 | All HSEQ documentation is managed electronically, the integrity of the data being maintained through system back-up and virus protection. | | * Back-up Procedure * Virus Protection | Administration | * Electronic copy of system |
| **6** | Completed records are stored, for a period of not less than 7 years. Controlled Documents Register specify the retention period for each record | |  | Administration | * Controlled Documents Register |
| **7** | Archive all records after the end of the retention period. | | * No disposal of archives envisaged at this stage | Administration | * Controlled Documents Register |

# BACK-UP PROCEDURE

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| **PURPOSE:** | | This procedure identifies the key steps in the back-up protection of Information Technology (electronic data). | | | |
| **SCOPE:** | | This procedure applies to all data stored on the various servers within PD. | | | |
| **SAFETY & THE**  **ENVIRONMENT:** | | * There are no specific safety and environmental requirements. | | | |
| **STEPS IN THE PROCEDURE** | | | **REFERENCES** | **RESPONSIBILITY** | **RECORDS** |
| **1** | **Replace the back-up tapes at the beginning of each workday.** | | * Back-up system | Administration | * Backup tape/data |
| **4** | **All tapes are stored in a fireproof safe or off site** | |  | Administration | Nil |

# RECORDS MANAGEMENT PROCEDURE

All documents pertaining to the HSEQ Manual shall be maintained in a master manual at the principal place of business and be made available on request.

Documentation exists of the following levels:

* Policies
* Objectives
* Procedures
* Work Instructions
* Plans
* Forms

All documents, and changes to such, shall be authorized by Administration with approval from the Directors and listed in the document register in this manual. Identification shall include a Document ID code, name, issue number and date of issue.

The master documents shall be held as soft copies in the documentation folder in the main computer system and maintained by Administration, who shall also be responsible for ensuring that superseded documents are archived for a period of 3 years. Hard copy documents will be held at the Points of use, with the supervisor responsible for ensuring their currency.

Records shall be identified on the records register maintained at head office. Manhari Metals Document Policy require that all records be held as hard copy for a period of 5 years before disposal.

All documents used within Manhari Metals will be reviewed annually as an integral part of the internal auditing system.

Deeds, titles and other binding documents shall be copied, a certified statement of a copy of the original be obtained and the copy shall be securely stored separately to the original off the site. A scanned copy of the record shall also be made and securely stored offsite. A register of all such copies and documentation shall be kept at the principal location of the company.

All new issues of documentation shall have a direction to remove all superseded documentation as well as Document ID code, name, issue number and date of issue.

# MANAGEMENT REVIEW

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| **PURPOSE:** | | To ensure that MANHARI METALS projects have the necessary personnel, equipment, and processes to effectively carry out its services in a safe and environmentally sensitive manner whilst achieving the requirements of the customer, the community, and relevant legislation. This procedure also ensures that the HSEQ is effective and still meets the requirements of quality, safety, and environmental standards. | | | |
| **SCOPE:** | | This procedure is carried out once per year, and may be implemented more often as necessary. | | | |
| **SAFETY & THE**  **ENVIRONMENT:** | | * In the case of this procedure, quality, safety and environmental management are integral to the review process. | | | |
| **STEPS IN THE PROCEDURE** | | | **REFERENCES** | **RESPONSIBILITY** | **RECORDS** |
| 1 | Convene a Management Review Meeting as per the Agenda. | | * Previous Meeting Minutes | * Directors/ Administration | * [Management Review Agenda](file:///\\Prof-server\data\My%20Documents\OH&S\Pending\Forms\Management%20Review%20Agenda.doc) |
| 2 | Assess MANHARI METALS operations and project needs for training and equipment. | | * Training and Induction Program | * Directors/ Administration | * Training and Consultation Program |
| 3 | Review personnel capabilities and training needs. | |  | * Administration | * Training and Consultation Program |
| 4 | Document acquisition requirements for equipment and submit for approval. | |  | * Administration | * Acquisition Report |
| 5 | Update Training Plan to suit the findings of the Management Review Meeting. | |  | * Administration | * Training and Consultation Program |
| 6 | Revise Training Plan as training is completed. (Ongoing) | |  | * Administration | * Training and Consultation Program |
| 7 | Purchase equipment required. | | * Approval to Purchase | * All | * Purchase Orders |
| 8 | Review existing manuals and procedures and revise as necessary. | | * Quality System | * Administration and/or Consultant | * [Meeting Action Plan](file:///\\Prof-server\data\My%20Documents\OH&S\Pending\Forms\Meeting%20Action%20Plan.doc) |
| 9 | Review previous Action Plan and produce a new one for the coming year. | | * Previous Meeting Action Plan | * Administration | * [Meeting Action Plan](file:///\\Prof-server\data\My%20Documents\OH&S\Pending\Forms\Meeting%20Action%20Plan.doc) |
| 10 | Monitor the Action Plan to ensure items are carried out. (Usually once per month) | |  | * Administration | * [Meeting Action Plan](file:///\\Prof-server\data\My%20Documents\OH&S\Pending\Forms\Meeting%20Action%20Plan.doc) |

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| --- | --- |
| **PURPOSE:** | To ensure that any deficiency in materials, work practices, procedures, safety, environmental control, customer complaints or systems are assessed and practical solutions found to minimize the recurrence of the problem. |
| **SCOPE:** | This procedure shall be followed whenever a problem is identified in the quality of the service or where a safety or environmental incident, accident or near miss has occurred. This procedure shall also be used when a process or written procedure needs to be changed, whether it is identified through normal business or internal audit.  **Concerns and issues received from the community, the municipality or other authorities shall be handled and resolved with this procedure.** |
| **SAFETY & THE**  **ENVIRONMENT:** | * In this instance, corrective action processes apply to quality issues as well as safety or environmental incidents, accidents or near misses. |

# CORRECTIVE ACTION POLICY

This document details the corrective action to be followed by Manhari Metals

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| --- | --- | --- | --- | --- |
| **STEPS IN THE PROCEDURE** | | **REFERENCES** | **RESPONSIBILITY** | **RECORDS** |
| **1** | Work in the area shall cease until suitable corrective action is agreed whenever a quality, safety or environmental issue is detected. | Identified problem or non-conformance, safety or environmental incident, accident or near miss or customer complaint | All personnel | Conversation, diary notes, appropriate notice at location. |
| **2** | Fill in a Corrective Action Report |  | All personnel | Incident Report (where applicable)  Action Plan Register |
| **3** | Obtain a Report number from the Incident/Corrective Action Register. | Incident/Corrective Action Register | Administration | Incident Report (where applicable)  Action Plan Register |
| **4** | Carry out the immediate action to solve the problem. | Approval to fix the problem | Nominated personnel | Incident Report (where applicable)  Action Plan Register |
| **5** | Implement the corrective action to be taken so that the problem is less likely to happen again. | Approval of the corrective action | Nominated personnel | Incident Report (where applicable)  Attach appropriate notes to Action Plan Register |
| **6** | Follow up the report to ensure that the problem was solved and that the corrective action was effective. | Information from the people involved in the corrective action | Directors/  Administration | Incident Report (where applicable)  Action Plan Register |

# AUDIT PROCEDURES

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| --- | --- | --- | --- | --- | --- |
| **PURPOSE:** | | To ensure that the MANHARI METALS HSEQ Management System is being implemented in a consistent manner in all audit activities. Internal Audits are also used to identify where documentation is deficient and new ideas can be included. | | | |
| **SCOPE:** | | The entire quality management system shall be audited fully over a twelve-month period. This is to include communications from external parties. | | | |
| **SAFETY & THE**  **ENVIRONMENT:** | | * Ensure any required PPE is worn on sites audited. | | | |
| **STEPS IN THE PROCEDURE** | | | **REFERENCES** | **RESPONSIBILITY** | **RECORDS** |
| 1 | Audits shall be scheduled on an annual basis and an Audit Plan will be maintained. | | * Previous audit plans | Directors/ Administration | * Audit Schedule |
| 2 | Select impartial (independent) and competent auditor (auditor who completed at least Internal Auditor Course) | | * Auditor Training | Consultant | * Training Records |
| 3 | Conduct the audit | | * Audit Schedule | Auditor | a) Copies of procedures and forms to be audited.  b) Copies of documents from external parties |
| 6 | Document findings for any findings that are contrary to requirements and discuss with the process owner | | * Agreement of appropriate personnel | Auditor | * Audit Report |
| 7 | Issue report with appropriate attachments to Operations | |  | Auditor | * Audit Report |
| 8 | Determine/approve the corrective action and ensure it is carried out. | | * Input from personnel and the auditor | Directors / Administration | * Action Plan Register * Audit Report |
| 9 | Follow up the Corrective Actions to ensure they have been completed and sign off audit plan. | |  | Directors / Administration | * Action Plan Register |

# RISK MANAGEMENT POLICY – BUSINESS RISKS

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| --- | --- | --- | --- | --- | --- |
| **PURPOSE:** | | To ensure that business risks including risks related to the quality of services, the occupational health and safety of people and the protection of the environment are identified and managed. The aim is to establish a mechanism for identifying and controlling risks before they have an impact on MANHARI METALS, its personnel, the community or the environment. | | | |
| **SCOPE:** | | This procedure is applicable to MANHARI METALS activities. | | | |
| **SAFETY & THE**  **ENVIRONMENT:** | | * Identify OH&S risks not identified and covered in this HSEQ Manual and add them to the Risk Management Register, as per this procedure. * Certain Aspects of MANHARI METALS projects may present a potential or actual impact on the environment. Identify all aspects of each project and add them to the Risk Register, as per this procedure. | | | |
| **STEPS IN THE PROCEDURE** | | | **REFERENCES** | **RESPONSIBILITY** | **RECORDS** |
| **1** | **QUALITY OF SERVICE RISKS**  **Identify the potential or actual problems related to the delivery of services and enter them in the Risk Register.** | |  | Directors/  Administration | * [Risk Register.](file:///\\Prof-server\data\My%20Documents\OH&S\Pending\Registers\Risk%20Management%20Register.xls) |
| **2** | **All risks shall be assessed by completing the Risk Register, consequently rating the risk, identifying corrective actions and target dates, including budget estimates for such actions.** | | Review resourcing and plant needs annually | Directors/  Administration | * [Risk Register.](file:///\\Prof-server\data\My%20Documents\OH&S\Pending\Registers\Risk%20Management%20Register.xls) |
| **3** | **The Risk Register shall be reviewed annually and updated to ensure that target dates are met and that the corrective actions are effective in mitigating the risks.** | |  | Directors/  Administration | * [Risk Register.](file:///\\Prof-server\data\My%20Documents\OH&S\Pending\Registers\Risk%20Management%20Register.xls) |

# WORKPLACE INSPECTION PROCEDURE

**Purpose**

The objective of this procedure is to describe the process whereby management and employees may together identify hazards and take action to prevent injuries and illnesses arising out of work at the organisation's workplace.

The process involves inspection, communication, evaluation and review. A key feature of the process is to ensure management accountability and the commitment of all personnel to hazard elimination and control. This is a formal process and must be complimented by informal inspections on a regular basis.

**Procedure**

1. Formal workplace inspections will be conducted monthly using the *Workplace Inspection Checklist Form*. The monthly *Workplace Inspection Checklist* *Form* may be completed by any employee but must be signed off by the Manager.
2. The Checklist may be modified to include a check on any controls implemented as a result of previous hazard identifications.
3. Items which generate a “No” response on the Checklist will be immediately transferred to a *Hazard Report Form* unless able to be immediately rectified.
4. An Annual *HSEQ Activities Calendar* will be prepared and maintained by the
5. Manager. The inspection calendar will document the required date for completion of the *Workplace Inspection Checklist Form* as well as the name of the employee who will conduct the inspection.
6. All employees are required to participate in the completion of the *Workplace Inspection Checklists Form* on a rotational basis. The employee who has completed the checklist will sign the inspection calendar to indicate completion. A copy of the calendar will be provided to all employees via a notice board or similar.
7. *Hazard Report Form* attached to the *Workplace Inspection Checklist Form* will be tabled at the safety Meeting.
8. All personnel will have access to inspection reports.
9. The Managing Director will review the process annually.

**Audit Records**

Copies of inspections in accordance with this procedure

Annual HSEQ Activities Calendar

# TRAINING PLAN PROCEDURE

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **PURPOSE:** | | To assess, plan and implement suitable training for MANHARI METALS personnel. | | | |
| **SCOPE:** | | This procedure is designed to provide specific needs for MANHARI METALS and is supported by top management. | | | |
| **SAFETY & THE**  **ENVIRONMENT:** | | * Any specific safety or environmental management training shall be considered and included. | | | |
| **STEPS IN THE PROCEDURE** | | | **REFERENCES** | **RESPONSIBILITY** | **RECORDS** |
| **1** | **Prior to the Management Review Meeting, identify the skill requirements needed to resource MANHARI METALS Operations & Projects** | | * Skills Matrix | Administration | * [Skill](file:///\\Prof-server\data\My%20Documents\OH&S\Pending\Forms\Training%20Plan.doc) Matrix * HR Records |
| **2** | **Assess the Manhari Metals personnel into determine which of the above skills already exist** | | * Review prior works experience & qualifications | Administration | * HR Records |
| **3** | **For any skills that are not present, prepare a Training Plan for the next twelve months to bridge the gap.** | |  | Directors and Administration | * [Training Plan](file:///\\Prof-server\data\My%20Documents\OH&S\Pending\Forms\Training%20Plan.doc) |
| **4** | **Monitor the Training Plan to ensure that training is conducted as planned.** | |  | Administration | * [Training Plan](file:///\\Prof-server\data\My%20Documents\OH&S\Pending\Forms\Training%20Plan.doc) |
| **5** | **Report results of Training Plan to the Management Review Meeting.** | |  | Administration | * [Management Review Meeting Agenda](file:///\\Prof-server\data\My%20Documents\OH&S\Pending\Forms\Management%20Review%20Agenda.doc) |

# ACKNOWLEDGEMENT AND ACCEPTANCE

This document, when signed has been accepted after amendment, variation or alteration to the satisfaction of all parties on behalf of the Directors and workers and now applies.

Signed \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Director

Date \_\_\_\_\_\_/\_\_\_\_\_\_/\_\_\_\_\_\_\_\_\_\_\_\_