BizOps Work Health & Safety Management System (WHSMS) Report 2019

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1. Overview/introduction

Established since 1998, BizOps Enterprises (BizOps) have successfully grown the business from a single shopfront to 150 retail, online and phone sales outlets that sell a high-quality range of products and services across Australia branded as BizOps.

The owners of BizOps Siimon Greig, Natushka Greig and Devon Mersydale provide over 50 years of combined experience in manufacturing and retail.

BizOps try to provide customers with a ‘green’ solution and service by employing sustainable business practices.

**Mission**

BizOps is committed to:

* providing high quality and innovative products and services to customers
* meeting the changing needs of customers
* offering innovative product solutions
* delivering speedy and personalised service
* employing professional and enthusiastic staff
* providing clean and ‘green’ products and services
* adopting sustainable work practices
* undertaking continuous improvement processes.

BizOps is known for its enthusiastic and inclusive culture. BizOps seeks to maintain professional and well-supported staff.

**Objectives and Goals**

2015-2020 BizOps consolidates its position in the market as lead retailer for ‘green’ and sustainable solutions for high quality exclusive products with the following goals;

* Launch new high-quality exclusive consumer products to meet customer demand, ahead of competitors, within budget.
* Maintain ranking in the National Industry Customer Service Awards.
* The product delivery service is part of the BizOps brand.
  1. Purpose

As BizOps has undergone major growth, it has been decided to look at expanding the head office by undergoing a major refurbishment and fitting.

This is the establishment of the Work Health and Safety Management Plan for BizOps.

The purpose of this Plan is to establish and maintain an effective health and safety management system. BizOps is committed to implementing a structured approach to workplace health and safety in order to achieve a consistently high standard of safety performance.

This Plan will assist BizOps in meeting its obligations in accordance with work health and safety legislation.

This Plan applies to all BizOps officers and workers and to other persons at risk from work carried out at BizOps workplaces. Failure to comply with the requirements of this Plan may lead to disciplinary action.

1. Background/issues to be addressed

Due to growth at BizOps Enterprises, we have decided to look at how we can expand our head office by refurbishing and fitting out the front building.

We will need to employ workers across a range of occupations and trades, including engineers, plumbers, electricians, carpenters and cabinetmakers, and painters. Nail guns, jackhammers, power tools, elevated work platforms and scaffolding, and a range of other building and construction equipment will be used extensively.

The building being renovated fronts a busy street; construction activities will need to ensure vehicle and pedestrian traffic is safe and uninterrupted.

WHS system implementation and maintenance tasks over the coming weeks leading up to commencement of work include:

* confirming legislative requirements
* identifying relevant roles and responsibilities
* resourcing the WHS management system
* establishing appropriate induction and training
* providing participation and consultation arrangements for establishing the WHS management system
* developing processes for identifying and resolving issues
* implementing hazard and risk control procedures that ensure legislative compliance.

The work health and safety management system (WHSMS) must also provide a mechanism for evaluating the effectiveness of the processes, which you and your WHSMS team will put in place.

1. Work Health and Safety Arrangements
   1. Work Health and Safety (WHS) Policy

The Statement of Commitment and the Implementation of Policy Commitment provide the overarching direction BizOps will follow in pursuit of workplace health and safety outcomes. These commitments are

**Statement of Commitment**

BizOps is committed to providing a workplace that enables all work activities to be carried out safely. We will take all reasonably practicable measures to eliminate or minimise risks to the health, safety and welfare of workers, contractors, visitors, and anyone else who may be affected by our operations.

We are committed to ensuring we comply with the **Work Health and Safety (WHS) Act 2011** (the Act). We will also comply with any other **relevant legislation**, applicable **Codes of Practice** and **Australian Standards** as far as possible.

The WHS Management Plan and BizOps WHS Policies and Procedures set out the safety arrangements and principles which are to be observed by BizOps and its workers to ensure compliance with the WHS Act and to provide appropriate mechanisms for continuing consultation and management of WHS matters.

**Implementation of Policy Commitment**

BizOps is committed to ensuring, so far as is reasonably practicable, the health and safety of its workers (employees, contractors, labour hire workers, outworkers, apprentices, students and volunteers) while they are at work and that the health and safety of other persons (e.g. visitors) is not put at risk from our operations. This will be achieved by:

* providing and maintaining a healthy and safe work environment through the implementation of safe work practices, safe systems of work and the provision of safe plant and equipment;
* ensuring that workplaces under the control of BizOps are safe, without risk to health, and have safe means of access and egress;
* routinely consulting in order to maintain effective and co-operative relationships between BizOps and its workers, and with other duty holders, on health and safety matters in the workplace; and
* reviewing, through appropriate mechanisms, the effectiveness of the safety measures taken.

BizOps commitment to providing safe and healthy working environments for its workers includes:

* providing relevant, up to date WHS information to all workers on matters such as workplace safety and their responsibilities;
* providing expert assistance in WHS matters where necessary;
* providing instruction and/or training in work processes where appropriate;
* developing and implementing strategies which include workplace assessment, hazard identification, and appropriate remedial action to eliminate or control hazards; and
* implementing and maintaining appropriate information, reporting and statistical systems.
  1. Definitions

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

* 1. Responsibilities

**BizOps - Person Conducting a business or undertaking (PCBU)**

The key duties of the PCBU are set out in Safe Work Australia’s Guide to the Model Work Health and Safety Act.

As the duty holder, BizOps, being the PCBU, must:

* ensure the health and safety of its workers and others in our workplace
* ensure the health and safety of other persons is not put at risk from work carried out as part of its operations
* maintain accommodation owned or under their management and control to ensure the health and safety of workers occupying the premises.
* provide and maintain a work environment that is without risks to health and safety which includes:
  + ensuring safe access in and out of the workplace
  + ensuring that any fixtures, fittings and plant do not put at risk the health and safety of any person
  + all workplace activity relating to plant or structure, including its decommissioning or dismantling, is, so far as is reasonably practicable, without risks to health and safety.
* provide and maintain safe plant and structures
* provide and maintain safe systems of work
* ensure the safe use, handling and storage of plant, structures and substances
* provide adequate facilities for the welfare of workers
* provide information, training, instruction and supervision
* monitor the health of workers and the conditions or our workplaces.

Specified duties as a PCBU also include:

* record and notify Comcare of any notifiable incidents arising out of the conduct of the business or undertaking
* ensure authorisations are in place for any high-risk work or plant
* consult so far as reasonably practicable with other PCBUs or persons who have a duty regarding work health and safety matters
* consult so far as reasonably practicable with workers, their representatives and Health and Safety Representatives on work health and safety matters.

**The Chairperson and members of the Board - Duties of Officers**

The key duties of officers are set out in Safe Work Australia’s Guide to the Model Work Health and Safety Act.

The Chairperson and members of the Board, as officers, are responsible for ensuring that BizOps (PCBU) complies with any duty or obligation under the WHS Act. This is achieved by these officers exercising due diligence, which means they:

* acquire and keep an up to date knowledge of work health and safety matters
* gain an understanding of BizOps operations and the hazards and risks involved
* ensure that appropriate resources and processes are provided to enable hazards to be identified and risks to be eliminated or minimised
* ensure that information regarding incidents, hazards and risks is received, considered and responded to in a timely way
* ensure that BizOps has, and implements, processes for complying with its WHS duties and obligations
* verify the provision and use of the resources and processes listed above.

This may include:

* having work health and safety as a standing agenda item for each Board meeting
* integrating WHS laws into everyday business through consultation with Managers and all workers
* developing a work health and safety management system framework, which will be reviewed on a regular basis by the Chairperson and Board members
* ensuring that WHS risk management is incorporated into all business activities and that hazard identification, risk assessment and control is an on-going process, including:
  + development and maintenance of a WHS risk register
  + development and maintenance of WHS policies and procedures
  + ensuring an effective injury/incident reporting procedure
  + ensuring appropriate processes are in place for WHS issues relating to contractor management
  + ensuring that the procurement of any equipment takes into account WHS matters
  + ensuring that regular hazard inspections of the BizOps workplaces occur
  + ensuring that WHS is a standing agenda item at all staff meetings
  + incorporating WHS updates and information into regular reporting provided to the Board by Managing Directors
  + ensuring that WHS issues are part of all training provided for staff, including induction
  + ensuring that contractors and visitors to BizOps are provided with appropriate and reasonable WHS information at site entry, and
  + ensuring that the work environment is a safe environment.

**The Risk Management Policy Committee**

The Risk Management Policy Committee oversees risk management and implementation on behalf of the board and the chief executive officer.

This committee is responsible for:

* ensuring BizOps is complying with any legal requirements
* ensuring risks are effectively managed
* maintaining business operations
* identifying significant operational risks
* monitoring the management of strategic and operational risks
* directing the risk management processes
* receiving and analysing risk management reports and informing the BizOps board
* making recommendations to the BizOps board regarding risk management

**Managing Directors**

The Managing directors are responsible for ensuring that BizOps WHS policies and procedures are implemented in the workplace and/or systems of work under their control. As an integral part of their normal duties, the Managing Directors will:

* make recommendations to the risk management policy committee on risk management policies and procedures
* review risk management incidents as they occur
* provide support and advice to the committee on risk management issues affecting their areas in relation to identifying, analysing, evaluating and treating risks
* consult with their workers on measures to protect their health and safety
* actively follow agreed safety practices and model positive attitudes towards health and safety matters
* notify the committee and health & safety officer of all incidents, hazardous situations, dangerous occurrences or immediate risks to health and safety of any workers
* ensure that all workers are informed of this policy
* undertake consultation with all managers and workers on change that may affect their health and safety
* ensure that WHS is a standing agenda item at all staff meetings
* establish and administer a BizOps risk register
* implement risk management training by arranging for their workers to be instructed in healthy and safety systems of work and procedures and supervise the practice of safe working procedures.

**Managers and Leaders**

Managers and leaders are responsible for providing a workplace that is, as far as reasonably practicable, safe and healthy workplace for workers and visitors, in particular in the areas of their control. This includes:

* modelling health and safety leadership
* demonstrating a commitment to good health and safety performance, by:
  + talking about safety at regular meetings
  + ensuring safe work procedures are followed
  + reporting incidents, hazards and safety concerns promptly
  + assessing task risk and not allowing an activity to continue until it can be controlled adequately
* fostering a strong work health and safety culture where worker input is valued
* promoting and implementing the BizOps Work Health and Safety Management System
* actively support the identification of hazards and risks and the management of these
* understand and monitor safety performance objectives
* proactively manage other duty holders (e.g. contractors), when required.

**Workers**

Workers must take reasonable care for their own health and safety while they are at work and take reasonable care that their acts or omissions do not adversely affect the health and safety of another person. They must comply, so far as they are reasonably able, with any reasonable instruction given by the Managing directors, as well as co-operating with any reasonable BizOps policy or procedure which relates to workplace health and safety. On a day to day basis, this includes:

* to the extent of the worker’s control or influence over working conditions and methods, take reasonable care to work safely
* making sure that the work area is safe when leaving it
* make proper use of all appropriate safeguards, safety devices and personal protective equipment
* follow agreed safe working practices and rules
* report all known hazards, accidents and incidents as soon as possible

It is acknowledged that, in accordance with the Act, a worker may cease, or refuse to carry out work if they have a reasonable concern the work would expose the worker to a serious risk to their health or safety. The Act requires workers who cease work to notify the relevant manager that they have ceased unsafe work as soon as practicable after doing so. It also requires workers to remain available to carry out ‘suitable alternative work’. This would not however require workers to remain at any place that poses a serious risk to their health or safety.

**Contractors**

Contractors, sub-contractors and self-employed persons are defined as “workers” under the WHS Act if they carry out work in any capacity for BizOps. They are required to:

* comply with the requirements of the WHS legislation
* have in place any work health and safety policies and programs required under State safety legislation
* consult with BizOps about safety matters and comply with BizOps policies
* work safely and to include the safety of BizOps staff and visitors in their safety plans

If any staff member believes that a contractor may be engaging in an unsafe work practice, they are required to report this issue to their manager.

**Visitors, volunteers and others**

Visitors, volunteers and other persons to BizOps also have responsibilities to abide by our workplace safety rules and procedures as per the Guide to the WHS Act. These responsibilities include to:

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

**Noncompliance**

Failure to comply with WHS regulations, policy and procedures may result in prosecution by authorities under the WHS Act. Failure by contractors to comply or observe a direction is considered a breach of their contract and sufficient grounds for termination of that contract and will further result in immediate ejection from the premises or site.

Prosecutions under the Act can result in fines being paid by companies as well as individuals. Prison is also a possible outcome of noncompliance where deliberate noncompliance results in death or serious injury.

Aspire Training & Consulting. (2017, p.22). BSBWHS501 Ensure a safe workplace Release 1.Learner guide BXWHS501.

* 1. Consultation, Participation and Communication Arrangements

Consultation between PCBUs and workers helps to share ownership of health and safety goals.

**Workers and Managers**

Open communication between workers and managers is important to ensuring a safe workplace. Therefore, workers are encouraged to:

* ask questions relating to WHS
* bring up safety concerns
* make recommendations regarding WHS
* give regular feedback
* become involved in evaluation of safety issues
* participate in any WHS related problem-solving process.

It is important that workers help shape decisions about WHS particularly when:

* identifying hazards and assessing risks
* making decisions about ways to eliminate or minimise those hazards or risks
* proposing business changes that may affect the health and safety of workers
* purchasing of new equipment or substances
* developing or changing job tasks or safety procedures.

All workers belong to a work group and are encouraged to raise any work health and safety concerns they may have with their manager and/or Health and Safety Representative. If the issue identified remains unresolved, it should be raised directly with the Managing directors.

**Health and Safety Representative (HSR)**

HSRs are elected by members of a work group in order to represent the interests of that work group in matters relating to work health and safety. HSRs must undertake approved training to exercise their powers, and may:

* ensures the BizOps operation complies with their legal responsibilities under the WHS Act.
* consult with workers on a regular basis
* inspect a work area as required
* participate in workplace accident and incident investigations as required
* participate in any change management discussions that may affect the health and safety of workers
* provide advice to managers on the welfare of workers in their work group.

HSRs cannot exercise their powers under the Act unless they are trained. HSRs are not liable for acts or omissions that are undertaken in good faith. HSRs are not entitled to personal or medical information about a worker without their consent unless that information is of a general form that does not identify workers specifically.

**Health and Safety Committee (PCBUs)**

Health and Safety Committees provide the forum for the constructive discussion of measures to assure health and safety in the workplace. At BizOps the Health and Safety Committee will meet weekly and:

* facilitate co-operation between the PCBU and workers in the instigation, development and implementation of WHS policies and procedures
* keeps up to date with health and safety information and current health and safety best practice
* assist in developing standards, rules and procedures relating to health and safety
* consult with workers regarding their WHS concerns
* consult with management regarding worker WHS concerns including change that may influence WHS more broadly
* ensure the conduct of regular workplace inspections.
* investigates training needs and ensures adequate training is provided
* maintains health and safety management documentation in the workplace
* helps to find solutions to health and safety problems
* helps to investigate workplace incidents and evaluates the overall health and safety program

Minutes of the latest Health and Safety Committee meeting will be made available for all workers to review.

The Staff Meeting Agenda is **Attachment 12**.

* 1. Training

The Retail Outlet Manager will conduct a training needs analysis and arrange for appropriate WHS training to be undertaken by workers as required.

Where required, BizOps workers are to demonstrate their competencies to perform required tasks safely.

In tasks with a high potential for injury, a separate documented assessment of a person’s competency may be undertaken.

As a guide, competency assessments should be signed and dated by the assessor/assessed and contain the following elements:

* task or equipment description
* information on licenses held (or other relevant qualifications)
* a checklist containing the essential competencies that were demonstrated, and
* comments or confirmation that the competency was met.

BizOps is committed to developing a suite of competencies to deal with all safety sensitive work tasks.

* 1. WHS Risk Assessment

The purpose of any WHS risk assessment is to ensure that, for any identified hazards, appropriate control measures are implemented in order to protect workers, contractors and visitors from risks to their health, safety and welfare.

Control measures for WHS hazards should be implemented as required using the following hierarchy of control, in order of preference these measures relate to:

* elimination (removal of the hazard)
* substitution (substitute the hazard for something which is less hazardous e.g. replace a hazardous chemical with one within is not hazardous)
* isolation (isolate the hazard from people e.g. place a noisy piece of equipment in another location)
* engineering (e.g. guarding on machinery)
* administrative (e.g. provision of training, policies and procedures, signage)
* personal protective equipment (e.g. use of hearing , eye protection, high visibility vests).

Outcomes of risk assessments will be documented in the WHS Hazard Identification Form, and the control measures reviewed at least annually or earlier should a task or activity be the subject of a WHS incident or a change of process or requirement. Current risk assessments will ensure that BizOps achieves the goal of eliminating or minimising the risk workers may be exposed to.

The WHS Hazard Identification Form is **Attachment 13**.

BizOps policies and procedures in place to manage workplace risk are as follows;

**BizOps risk management policy**

**Scope**

This policy describes our commitment to meeting strategic and operational goals related to risk management. This policy forms part of our commitment to continuous improvement.

Risk management will be reviewed through regular training, monitoring, auditing and reporting processes.

All BizOps Enterprises employees are responsible for applying risk management principles and practices in their work areas.

Management is responsible for ensuring risk management principles are applied.

**Framework**

**AS/NZS ISO 31000:2009 Risk management** – Principles and guidelines

This risk management policy specifies that:

* all business activities must be assessed for risk prior to commencing and then managed throughout
* risk identification, analysis, evaluation and treatment must be reported and updated in the BizOps risk register.

**Definitions**

* A risk is any event that impacts BizOps' ability to meet its goals and objectives.
* Risk identification is the process of determining what might happen, how, when and why in relation to the risk identified.
* Risk analysis is a process that helps the organisation understand the effect of the risk on our goals and objectives.
* Risk evaluation involves comparing risks and determining the order in which they should be dealt with.
* Risk treatment is the process for applying measures to minimise, modify or eliminate the risk.

**Responsibilities**

The risk management policy committee oversees risk management and implementation on behalf of the board and the chief executive officer.

This committee is responsible for:

* ensuring Biz Ops is complying with any legal requirements
* ensuring risks are effectively managed
* maintaining business operations
* identifying significant operational risks
* monitoring the management of strategic and operational risks
* directing risk management processes
* receiving and analysing risk management reports and informing the BizOps board
* making recommendations to the BizOps board regarding risk management.

The managing directors are responsible for:

* making recommendations to the committee on risk management policies and procedures
* reviewing risk management incidents as they occur
* providing support and advice to the committee on risk management issues affecting their areas in relation to identifying, analysing, evaluating and treating risks
* establishing and administering a BizOps risk register
* implementing risk management training.

All BizOps employees are responsible for applying risk management principles and practices in their work areas. Management is responsible for ensuring risk management principles are applied.

Employees must report risks and participate in risk management training.

**BizOps risk management procedures**

**Purpose and scope**

In accordance with the BizOps Enterprises risk management policy, these procedures describe the organisation’s standard process for risk management, including:

1. Risk identification
2. Risk rating
3. Risk controls
4. Risk monitoring and reporting

A standard approach to risk management allows risks to be correctly prioritised across all BizOps’s operations.

**Responsibilities**

The risk management policy committee oversees risk management and implementation on behalf of the board and the Chief Executive Officer.

All BizOps employees are responsible for applying risk management principles and practices in their work areas. Management is responsible for ensuring risk management principles are applied.

Employees must report risks and participate in risk management training.

**Risk management process**

A risk to BizOps is any event or action that could have a negative impact on the organisation. This includes events that could lead to:

* death or injury
* financial loss to BizOps
* damage to BizOps’s reputation or adverse media coverage
* damage to the physical environment, including land, water or air quality
* failure to meet regulatory or legislative requirements.

The risk management policy specifies that:

* all business activities must undergo risk assessment prior to commencing and then undergo risk management throughout
* risk identification, analysis, evaluation and treatment must be reported and recorded in the BizOps risk register.

**1. Risk identification**

Risk identification is a structured approach to identifying the events that, if they were to occur, could have a negative impact on the organisation.

**2. Risk rating**

Risk rating is a process to analyse and understand each of the risks, including understanding what causes the risk to occur and what controls are already in place to manage the risk. Risk assessment also determines:

* how severe a potential impact could be
* the likelihood of the organisation being negatively impacted in this way.

Once the potential impact and likelihood have been assessed, the risk assessment process considers whether the risk is acceptable to BizOps, or whether further treatments are required to reduce the level of risk.

All identified risks shall be assessed to determine the overall ranking for the risk. Risks are ranked in the following four categories:

* Extreme
* High
* Medium
* Low

The ranking of a risk determines:

* the nature of further action that is required
* the urgency with which further action should be undertaken
* the reporting requirements for the risk, including who the risk is reported to
* how the risk is monitored.

All risks within BizOps are ranked using a common scale that assesses:

* the potential consequences if the risk were to occur
* the likelihood of BizOps being impacted in that way.

A common approach to risk ranking is necessary to ensure that the largest risks to BizOps can readily be identified and risk management can be prioritised in a way that has the greatest overall benefit to the organisation.

The following tables show how the consequences and likelihood of risks are assessed.

**Consequence table**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Consequence | Consequence category | | | | |
| **Insignificant** | **Minor** | **Moderate** | **Major** | **Catastrophic** |
| Financial | <$5k | >$5k <$10k | >$10k <$100k | >$100k <$300k | >$300k |
| Reputation/market disruption | Isolated complaints from individuals; minor local media coverage | Adverse capital city/state media coverage; ongoing complaints | Loss of market opportunity or some loss of reputation; adverse national media attention | Reputation damage or loss of major opportunity that has a major impact on BizOps’s operations | Will impact future business operations in catastrophic way; continuous public criticism |
| Regulatory and legislative | Minor breaches by individual staff members | Organisational breach | Penalties for breach of Act or legislation; third-party claims | Major fines for breaches; multiple third-party claims | Severe fines and/or prison sentences |
| Environmental | Brief spill incident contained onsite with no environmental harm | Minor onsite spill incident; pollutant contained and cleaned up immediately | Release of pollutant or environmental incident; moderate environmental harm | Large spill or environmental incident and significant associated cost | Long-term environmental damage with ongoing liabilities and/or possible EPA closure for undisclosed period |
| Safety | Treated with first aid | Medical attention required | Hospital treatment and ongoing rehabilitation | Hospital treatment and possible serious permanent injury | Loss of a life |

**Likelihood table**

Likelihood rating is based on the number of times within a specified period that a risk may occur either as a consequence of business operations or through failure of operating systems, policies or procedures.

|  |  |  |
| --- | --- | --- |
| Rating | Description | Probability |
| Expected | Expected to occur in most circumstances | > 80% |
| Probable | Will probably occur in most circumstances | 50%–80% |
| Possible | Might occur within a 1 to 2-year time period | 21%–49% |
| Improbable | Could occur during a specified time period | 5%–20% |
| Rare | May only occur in exceptional circumstances | < 5% |

The risk rank is determined by combining the consequence and likelihood as shown as follows:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Level of likelihood | Level of impact | | | | |
| **1**  **(Insignificant)** | **2**  **(Minor)** | **3**  **(Moderate)** | **4**  **(Major)** | **5**  **(Catastrophic)** |
| **A (Expected)** | Medium | Medium | High | Extreme | Extreme |
| **B (Probable)** | Medium | Medium | Medium | High | Extreme |
| **C (Possible)** | Low | Medium | Medium | High | High |
| **D (Improbable)** | Low | Low | Medium | Medium | High |
| **E (Rare)** | Low | Low | Low | Medium | Medium |

**Assessing likelihood**

When assessing likelihood, it is important to note that the likelihood score for a risk needs to reflect the likelihood of the consequence occurring, rather than the likelihood of the risk occurring.

For example, there may be a risk that staff are injured as a result of a fire emergency. The consequences of a fire may range from a relatively minor injury to death, depending on the circumstances of the fire.

While fire emergencies are fortunately not common within BizOps, the likelihood of staff dying as a result of a fire is likely. There are therefore several ways of scoring this risk.

|  |  |  |  |
| --- | --- | --- | --- |
| Type of incident | Consequence | Likelihood | Risk score |
| Minor incident | Minor injury to individuals  Consequence: Moderate | Possible | Medium |
| Serious incident | Serious harm to individual  Consequence: Major | Possible | High |
| Fatality | Fatality as a result of the fire  Consequence: Catastrophic | Possible | High |

Overall it is clear that this risk would be Medium to High. To highlight the serious nature of the risk, it would therefore be appropriate to give this risk the risk scoring that shows the High-risk rating, and therefore score this risk with a consequence of Catastrophic and a likelihood of Possible.

**3. Risk controls**

Controls represent a whole range of actions, measures and strategies taken by management and employees to eliminate or reduce risks. The process of determining risk controls includes assessing the consequences and likelihood of the risk and evaluating how to treat the risk. This could include:

* avoiding the risk
* mitigating the risk
* transferring the risk
* accepting the risk.

A process should then be followed to identify efficient and effective ways to mitigate the risk. This can occur by either:

* removing the risk
* reducing the likelihood of the risk impacting BizOps
* reducing the consequences if the risk were to occur
* a combination of these approaches.

Consider the hierarchy of control:

* Elimination
* Substitution
* Engineering controls
* Administrative controls
* Personal protective equipment

**4. Risk monitoring and reporting**

Risk monitoring and reporting involves a process of regular review to ensure that:

* new risks are identified and considered as they arise
* existing risks are monitored to identify any changes that may impact the organisation
* new risk controls are being implemented
* existing risk controls are still in place and working effectively
* information about risks is adequately communicated.

All risks rated as moderate, significant or high in the risk identification process will be reviewed by the risk management policy committee regularly. This review will be via either:

* the risk manager reporting on new risks identified by staff during the course of their work since the last committee meeting
* risk owners providing a report on the status of their assigned risk to the committee (see below)
* the risk manager reporting on reviews of the risk register following a Structured Risk Identification Workshop each year, or any review of the risk register by the Executive.

The risk owner’s reports to the committee should outline that the risk controls are to indicate:

* causes of the risk
* implication of the risk with amendment to existing controls (if they exist)
* what any existing mitigating controls are
* what actions are being undertaken to put further controls in place, or maintain existing controls, and by when
* who is responsible for ensuring the controls are in place?
  1. Right of Entry

A WHS permit entry holder must also hold a current Fair Work Act 2009 entry permit. Their WHS entry permit and photographic identification must always be available for inspection. Where there is a suspected workplace WHS contravention, a permit holder is not required to give prior notice. However, as soon as reasonably practicable they must give notice of their entry and the suspected contravention to BizOps or the person with management or control of the workplace.

The permit holder may, in relation to the suspected contravention, inspect any work system, plant substance or structure; consult with BizOps and its workers; be allowed to inspect and make copies of relevant documents (unless to do so would contravene a State or Commonwealth law); and warn any person of a serious risk to health and safety if immediate or imminent.

Otherwise a permit holder is required to give at least 24 hours’ notice (and no more than 14 days) to the BizOps before entering a workplace to consult on WHS matters or provide advice on those matters to relevant workers.

BizOps must not, without reasonable excuse, refuse or unduly delay a permit holder’s entry into a workplace or obstruct them from exercising their rights under the WHS Act.

The permit holder must not intentionally and unreasonably delay, hinder or obstruct any person or disrupt any work at a workplace or otherwise act in an improper manner.

* 1. WHS Issue Resolution

Wherever possible, any WHS concerns will be resolved through consultation between workers, their representatives and/or their manager. If the concern cannot be resolved, then it can be referred to the Managing directors for resolution. Ultimately any issue remaining unresolved may be referred to the board. Where the issue remains unresolved the default procedure for issue resolution set out in the WHS Regulations must be followed.

If reasonable efforts have been made to resolve an issue and it remains unresolved, any party to the issue can ask Comcare to appoint an inspector to assist in resolving the matter.

* 1. Authoritive Sources

Further information can be found here:

* **Occupational Safety and Health Act 1984** <https://www.slp.wa.gov.au/pco/prod/filestore.nsf/FileURL/mrdoc_41381.pdf/$FILE/Occupational%20Safety%20And%20Health%20Act%201984%20-%20%5B07-j0-01%5D.pdf?OpenElement>
* **Occupational Safety and Health Regulations 1996** <https://www.slp.wa.gov.au/pco/prod/filestore.nsf/FileURL/mrdoc_41417.pdf/$FILE/Occupational%20Safety%20and%20Health%20Regulations%201996%20-%20%5B10-f0-03%5D.pdf?OpenElement>
* **Approved Work Health and Safety Codes of Practice** <https://www.commerce.wa.gov.au/worksafe/codes-practice>

Additional information on these sources may be found at <http://www.comcare.gov.au/>

1. General WHS Information
   1. Emergency Procedures

**Responsibility:** Health & Safety Representatives, Department Managers and relevant Managing Directors.

An emergency evacuation plan has been developed and this plan, together with a list of emergency contacts, is displayed in the following locations:

* Office/reception
* common areas
* workshops
* sheds
* male toilets
* female toilets

The Emergency Contacts List is at **Attachment 1**. All fire emergency equipment, such as horns, sirens and fire extinguishers, will be tested by an approved provider every 12 months.

* 1. Hazard / Injury / Incident Reporting

**Responsibility:** all managers and workers including contractors are required to complete an WHS Hazard Report Form if a hazard or injury or incident occurs.

How to Report a Hazard or Injury or Incident:

* Advise the direct line supervisor or Retail Outlet Manager of the incident or injury or hazard
* For recording purposes complete a WHS Hazard Report Form
* Complete the relevant sections of the form giving details of the incident. The form should be completed even when an injury has not occurred, that is, in the event of a near miss
* All hard copy forms should be signed by the relevant parties
* The direct line supervisor or Retail Outlet Manager of their delegate must record all injuries on the injury register
* Internal reporting of any hazard or injury or incident should occur is separate from reporting of notifiable incidents to Comcare.

The WHS Hazard Report Form is **Attachment 2**.

* 1. Reporting of Notifiable Incidents

Any serious incidents must be notified immediately to the Managing directors. After becoming aware that any such incident has occurred, it is the Managing directors’ responsibility to report ‘notifiable incidents’ to Comcare by the fastest possible means, either:

* by phone – ring Comcare 1300 366 979
* by fax or other electronic means – fax Comcare on 1300 305 916; email [notify@comcare.gov.au](mailto:notify@comcare.gov.au)
* Note: Comcare requires that immediate notification is followed within 48 hours in writing by completing a Notifiable Incident Report Form and forwarding it to Comcare, GPO Box 9905, Canberra, ACT, 2601

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| Definition of “notifiable incident”: “Notifiable incidents’ include the following: |
| * the death of a person |
| * a serious injury or illness of a person   Serious injury or illness includes immediate treatment as an in-patient in a hospital; immediate treatment for certain serious injuries; or medical treatment within 48 hours of exposure to a substance |
| * a dangerous incident   A ‘dangerous incident’ means any incident in relation to a workplace that exposes a worker or any other person to a serious risk to a person’s health or safety caused by incidents such as uncontrolled escape, spillage or leakage of a substance, an uncontrolled implosion, explosion, fire; or uncontrolled escape of gas or steam |

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| Hazard/Incident/Injury Reporting – Summary for the WHS Officer |
| * Ensure that the manager or worker has completed a WHS Hazard Report Form |
| * Review the incident with the manager or worker to determine if any actions need to be taken to eliminate or minimise the risk of the incident or hazard recurring. |
| * Complete the injury register. |
| * If the incident results in a death, serious injury or illness or a dangerous incident, notify Comcare Immediately.   + PH: 1300 366 979 Fax: 1300 305 916 Email: [notify@comcare.gov.au](mailto:notify@comcare.gov.au)   + Note: Comcare requires that immediate notification is followed within 48 hours in writing by completing a Notifiable Incident Report Form and forwarding it to Comcare, GPO Box 9905, Canberra, ACT, 2601 |
| * Maintain records of all the above. |

* 1. First Aid

**Responsible:** Managing Director, Business Operations invites workers to undertake role as first-aid attendants.

|  |
| --- |
| Definitions: |
| * First aid is the immediate treatment or care given to a person suffering from an injury or illness until more advanced care is provided or the person recovers. |
| * First aid officer is a person who has successfully completed a national accredited training course or an equivalent level of training that has given them the competencies required to administer first aid |

BizOps has in place the following first aid procedures, as required by First Aid in the Workplace Code of Practice

* The appointment and training of First Aid Officers (FAO)
* The provision of first aid kits within the workplace
* Clear signage with the name of the FAO and the location of the first aid kits
* The provision of a suitable first aid kit in all BizOps vehicles.

It is the FAO’s responsibility to ensure that the contents of all first aid kits are maintained First Aid Officer Training:

* The minimum level of training for a FAO is the Senior First Aid Certificate (or equivalent)
* Refresher training should be undertaken every three years.

First Aid Officer Responsibilities:

* The FAO is approved to render first aid assistance in the workplace.
* The FAO should ensure that they do not administer first aid services beyond their level of training.
* A record of any first aid treatment given should be kept by the FAO and reported to the Managing directors on a regular basis to assist with reviewing first aid arrangements.

Contact details for BizOps FAQs are displayed on all noticeboards.

|  |
| --- |
| First Aid – Summary for the Managing Director, Business Operations |
| * Ensure that a First Aid Officer (FAO) has been appointed and trained. |
| * Keep a copy of the FAQ’s qualifications. |
| * Ensure that a first aid kit is provided and maintained by the FAO. |
| * Advise all managers and workers of the name of the FAO and the location of the kit. |
| * Place a sign on the wall where the kit is located |
| * *First Aid in the Workplace Code of Practice* <https://www.comcare.gov.au/preventing/prevention/first_aid_in_the_workplace> available on the Comcare website. |

* 1. WHS Training and Induction

**Responsible:** Retail Outlet Manager.

**Training**

BizOps is committed to providing appropriate training to ensure workers have the skills and knowledge necessary to fulfil their WHS obligations. WHS training is a fundamental requirement for BizOps to achieve a safe workplace. The WHS training needs for BizOps will be determined in consultation with managers and workers, as well as through review of the WHS Risk Register, however it can be generally categorised into three kinds:

*Generic WHS Training*—skills and knowledge which is commonly required, e.g. induction training, WHS risk management training, evacuation procedures.

*Risk Specific WHS Training*—training required for those persons conducting activities with a specific risk to health and safety or a verification activity, e.g. first aid training, hazardous substances training, manual handling training, confined spaces training, working from heights.

*Task Specific WHS Training*—skills and licensing which are required depending on the specific hazards and risk, e.g. any equipment operation, high risk work licenses such as for driving forklifts, cranes.

**Documentation for Training**

Training records shall be maintained as evidence of training delivery and assessment of competence.

**WHS Induction**

All new managers and workers are required to be provided with WHS information regarding the workplace as part of their overall induction and introduction to BizOps. A thorough WHS induction process assists new staff to feel welcome, become integrated into the organisation and ensure that they are able to work safely.

The Induction Plan Template at **Attachment 3** should be used in conjunction with the general induction training program for workers to ensure that all new workers are aware of the WHS systems, policies and procedures in place within BizOps.

**Procedure**

The Retail Outlet Manager must ensure a WHS induction is provided on the new team leader or worker’s first day. If the Retail Outlet Manager is not available, he or she should organise for a replacement to conduct the induction. The Retail Outlet Manager must:

* use the WHS Induction Checklist included with attachment 3 to ensure that all WHS issues are covered
* on completion of the induction, sign the checklist and ensure that the new worker also signs
* file a copy of the induction checklist on the worker’s file
* provide the new worker with access to this WHS Management Plan and the WHS Policies and Procedures Manual.

A new Retail Outlet Manager will be inducted by the outgoing Retail Outlet Manager or a Board member.

**WHS Induction for Contractors/Visitors**

All contractors/visitors should be provided with a Safety Briefing prior to entering the BizOps premises.

All contractors/visitors must sign in and be provided with a copy of the BizOps Safety Briefing Handout to read, and to then sign, acknowledging that they have read and understood the information. These documents are included at **Attachment 4** WHS Induction for Contractors Visitors.

**Detailed WHS Induction for Contractors**

For contractors (e.g. trade persons) the requirements for induction will depend on the work to the undertaken and the duration of their stay at the workplace. At a minimum, contractors should be advised of emergency procedures and location of facilities. Refer to Detailed WHS Induction Checklist for Contractors **Attachment 5**.

All WHS training provided to managers, workers and contractors should be recorded in the WHS Training Register (**Attachment 6**). Alternatively, this training register can be incorporated into the overall Staff Development and Training Register which details all professional development and training undertaken by BizOps managers and workers.

* 1. Risk Management and the Risk Register

WHS risk management is a systematic process of hazard identification, risk assessment, and risk control with the aim of providing healthy and safe conditions for managers, workers, visitors and contractors at BizOps.

As required by the WHS Act, BizOps has adopted a risk management approach to underpin its WHS Management System. This approach involves all managers and workers in identifying hazards, assessing and prioritising risks, implementing control measures and reviewing how effective the control measures are.

All workers are responsible for assisting in managing the particular risks associated with their specific work environment. Risk management strategies used by BizOps include:

* regular hazard inspections of the environment
* a comprehensive risk register detailing all WHS risks associated with the operation and activities of BizOps
* documented WHS policies and procedures
* risk assessments of newly purchased equipment
* risk assessments for any change to work processes
* hazard, injury, incident reporting procedures
* incident investigations (at the direction of the Station Manager)
* WHS job safety analysis for specific BizOps activities including:
  + mustering
  + branding and tagging
  + fence tensioning
  + changing split rim tyres
  + windmill maintenance/working at heights
  + refuelling.

|  |
| --- |
| Definitions: |
| * WHS Hazard: Anything which has the potential to cause injury or illness. |
| * WHS Risk: A WHS risk is the chance of someone becoming injured or ill as a result of a workplace hazard. This significance of the risk is determined by considering the likelihood of it happening and the consequences if it does happen. |
| * WHS Risk Control: WHS risk control is action taken to eliminate or reduce the likelihood that exposure to a hazard will result in injury or illness to people or damage to property and the environment. |

**The Risk Management Process**

WHS risk management should be undertaken for all activities where there is the potential for harm including:

* before activities commence;
* before the introduction of new equipment, procedures or processes;
* when equipment, procedures or processes are modified.

**Step 1: Identify the Hazard**

A hazard is a source or potential source of injury, ill health or disease. Hazard identification is the process of identifying all situations and events that could cause injury or illness by examining a work area/task for the purpose of identifying all threats which are ‘inherent in the job’. Tasks can include, but may not be limited to using tools, hazardous chemicals, dealing with people, lifting/moving items and mustering.

**Step 2: Assess the Risk**

Assessing the risk from a hazard determines its significance. Firstly, consider the consequences should something happen; will it cause a serious injury, illness or death or a minor injury. Secondly, consider how likely is this to occur—very likely, not likely at all or somewhere in between? Some of the things to think about include:

* how often is the task undertaken?
* how frequently are people near the hazard
* how many people are near the hazard at a particular time
* has an incident happened before?
* have there been any ‘near misses’

Use the table below to determine how significant the risk is.

Where a manager, worker, contractor, or visitor to the workplace identifies a hazard, BizOps requires that it is eliminated or reduced in consultation with the relevant stakeholders.

* Step 1: identify the Consequences—or how severely could it hurt someone
* Step 2: identify the Likelihood—or how likely is it for an injury to occur
* Step 3: identify the Risk Priority Score—to prioritise your actions
* Step 4: controlling the risks – the hierarchy of control
* Step 5: apply the hierarchy of hazard control
* Step 6: review the process

**Step 1: Identify the Consequences – or how severely could it hurt someone**

|  |  |  |
| --- | --- | --- |
| Risk likelihood legend | Grade | Level of likelihood |
| A | Expected (will occur regularly) |
| B | Probable (will occur at some stage) |
| C | Possible (could occur) |
| D | Improbable (could occur but unlikely) |
| E | Rare (may occur but in limited situations) |

**Step 2: Identify the Likelihood – or how likely is it for an injury to occur**

|  |  |  |
| --- | --- | --- |
| Risk impact/ consequence legend | Grade | Level of impact |
| 1 | Insignificant |
| 2 | Minor |
| 3 | Moderate |
| 4 | Major |
| 5 | Catastrophic |

**Step 3: Identify the Risk Priority Score – to prioritise your actions**

**Risk categorisation matrix**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Level of likelihood | Level of impact | | | | |
| 1 (Insignificant) | 2 (Minor) | 3 (Moderate) | 4 (Major) | 5 (Catastrophic) |
| A (Expected) | Medium | Medium | High | Extreme | Extreme |
| B (Probable) | Medium | Medium | Medium | High | Extreme |
| C (Possible) | Low | Medium | Medium | High | High |
| D (Improbable) | Low | Low | Medium | Medium | High |
| E (Rare) | Low | Low | Low | High | Medium |

**Risk categorisation table**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Priority | Risk | Likelihood | Impact | Level of risk |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
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**Step 4: Controlling the risks – the hierarchy of control**

Control the hazards—the aim is to implement the most reliable controls to create a safe workplace rather than simply relying on people to behave safely, following processes or using protective equipment. In many cases, a combination of several control strategies may be the best solution.

|  |  |
| --- | --- |
| Risk Control Hierarchy | |
| **Elimination:** remove the equipment from use, dispose of unwanted chemicals | |
| **Substitution:** use a non-hazardous chemical, use a different machine that can do the same task | |
| **Isolation:** contain noisy machinery within a booth | |
| **Engineering**: design equipment differently, providing lifting devices to minimise manual handling | |
| **Administrative:** task variation, job rotation, training | |
| **Personal Protective Equipment (PPE):** personal protective equipment; gloves, hearing protection, eye protection | |
|  | |
| **Risk = Action and Response** | |
| 1. **Extreme** | Stop the activity – immediate action is required to ensure safety – safety measures applied must be cleared by the Station Manager before any activity recommences  Proceed with caution – immediate reporting of emerging or ongoing risk exposure at this level to the Station Manager for decision is mandatory |
| 1. **High** |
| 1. **Substantial Risk** | Be aware – action required as soon as possible to prevent injury or illness  Report these risks to the responsible Manager during the current shift or before the next shift |
| 1. **Moderate Risk** |
| 1. **Low Risk** | These risks should be recorded, monitored and controlled by the responsible Manager |
| 1. **Acceptable Risk** | Do something when possible. Manage by routine procedures. |

**Step 5: Apply the hierarchy of hazard control**

|  |  |  |  |
| --- | --- | --- | --- |
| Activity: | | | |
| Risks |  | | |
| Control measures/ treatments | Control measure | Strength | Weakness |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| Impact of risk/s on areas outside your responsibility |  | | |
| Personnel involved |  | | |
| Expected outcomes of risk treatment plan |  | | |

**Step 6: Review the process**

Continuously review to monitor and improve control measures and find safer ways of doing things.

**Documentation of Risk Assessment**

The documentation required for a WHS risk assessment will depend on the operation or activity being assessed. The appropriate WHS Risk Assessment Form must be used when undertaking a risk assessment of the various activities of BizOps. The Risk Management Plan Template and procedure for conducting an assessment is at **Attachment 7**.

**The WHS Risk Register**

The risk assessment data collected from identifying, assessing and controlling risks should be documented on a centralised risk register for BizOps. The risk register holds a list of BizOps key risks that need to be monitored and managed. The risk register is to be managed by the WHS Officer who should be notified if new hazards are identified and controls implemented so that the risk register can be amended.

The WHS Officer is responsible for overseeing the Risk Register, and for ensuring that effective control measures are implemented and that risks are monitored and reviewed on a regular basis.

* 1. Workplace Hazard Inspections

BizOps is required by WHS legislation to be proactive in identifying hazards in the workplace which may affect the health and safety of its workers and eliminating or minimising the risks arising from those hazards.

In order to ensure a safe and healthy workplace, the Operation Manager and/or nominated manager/s accompanied by Health and Safety Representatives (HSRs) should undertake WHS hazard inspections of the workplace regularly and at any other times as required. The hazard inspection should be undertaken by following the principles of WHS risk management and using the attached information and checklists (**Attachments 8 and 9**).

If any hazards are identified through the hazard inspection process, controls must be implemented to ensure that the risk to health and safety is eliminated or minimised.

In addition to these regular inspections, all managers should also conduct weekly hazard inspections of their work sites in conjunction with HSRs. Any hazards noted during these inspections should immediately be reported to the Operations Manager and appropriate remedial action taken.

All hazard inspection documentation should be filed by the Operations Manager.

* 1. Purchasing

Prior to purchasing any goods or services for the workplace, they should be assessed to determine if there are any associated health and safety hazards. This includes the purchase of equipment such as machinery, tools, furniture, chemicals, as well as contracted services such as maintenance.

* 1. WHS Record Keeping

The WHS Officer and Operations Manager should retain all WHS and workers compensation documents. These documents are required to be filed for 30 years in safe storage accessible only to authorised personnel in accordance with the **Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)**.

* 1. Documents to be Displayed
* Emergency contacts page (**Attachment 1**)
* Emergency Evacuation Plan
* Return to Work Policy
* Work Health and Safety Policy
* Accident/Incident Notification details
* Compensation and Return to Work information
  1. Important Contact Numbers
* Comcare
* Telephone: 1300 366 979
* Facsimile: 1300 305 916
* Email: [notify@comcare.gov.au](mailto:notify@comcare.gov.au)
* Postal Address: GPO Box 9905, Canberra, ACT 2601
* After Hours Emergencies: In the event of a major incident an on-call inspector can be contacted on 1300 111 111

1. Specific WHS Requirements
   1. Asbestos

It is highly likely that the premises to be occupied by BizOps were built before 31 December 2003 and therefore, there is a requirement for BizOps to comply with these measures outlined including an asbestos management plan and asbestos register. Do not repair or conduct work on any building without first checking the asbestos register. A sample register is included at **Attachment 10**.

* 1. Inappropriate Behaviour

Bullying, harassment, discrimination and violence of any form will not be tolerated at BizOps. BizOps undertakes to investigate all complaints formally made. BizOps will act to resolve the complaint. If the complaint is found to be valid, action may include any combination of the following:

* Asking for an apology
* Creating an agreement with the offender that will stop the behaviour of concern
* Conciliation/mediation conducted by an independent/impartial third party to seek a mutually acceptable solution
* Disciplinary action in the form of verbal, written or final warning or dismissal
* All violence will be reported to the police.

In determining the action to be taken, the following factors will be considered:

* Severity and frequency of the behaviour
* Whether there have been previous incidents or prior warnings
  1. Contractors

BizOps is committed to ensuring that all workers under its control, including contractors and subcontractors have a safe and healthy environment in which to perform their duties. Contractors are likely to be workers employed by BizOps to undertake a specific task; the delivery/pickup of goods, tradespeople undertaking repair or maintenance work within the BizOps workplace. In order to achieve this objective, it is recognised that contractors need to be:

* suitably experienced to perform the tasks
* in possession of all necessary licenses, permits, registrations and insurance required to perform the works safely and in compliance with appropriate regulations
* notified of any potential hazards associated with the location or use of the area where the works are to be carried out
* made aware of Emergency Procedures
* if reasonable, and if the work will involve high risk tasks, have completed the Detailed WHS Induction Checklist for Contractors (**Attachment 5**).

All contractors must abide by WHS requirements which will be advised to them before engagement.

* 1. Dangerous Goods and Hazardous Substances

Hazardous substances are chemicals, organic matter and other substances which pose a health risk when people are exposed to them. These may include glues, paints, solvents, corrosives, adhesives, thinners, cleaning solutions, chemicals, flammable and Dangerous Goods. Dangerous goods are hazardous substances that are also explosive or flammable in nature with storage required that is fit for purpose.

All chemicals will be included in the hazardous substances register and have their current Safety Data Sheet (SDS) present for each chemical on the register. All workers shall have access to information about the chemicals in the event of a spillage or exposure, even where BizOps workers would not normally use the chemicals directly. Quantities of hazardous substances stored for use shall be kept to a minimum.

A hazardous substances register will be developed to record any substances purchased or used by BizOps (see **Attachment 11**). This will be reviewed on a regular basis.

* 1. Electrical Safety

Failure to maintain electrical equipment in a safe condition, or to use equipment in accordance with manufacturer’s instructions may result in injury or death to workers or other parties.

All electrical equipment must be protected from damage, used safely and checked regularly. In addition, there are other requirements that must also be implemented for ‘specified electrical equipment’. These requirements include combinations of testing and recording and connection to safety switches.

Regular inspection and testing of in-service electrical equipment by a competent person is a way to ensure this safety duty is met. The WHS legislation requires that electrical equipment is inspected and tested in accordance with Australian Standard 3760: 2010 In-service safety inspection and testing of electrical equipment. Only authorised electrical personnel are to perform installation, inspection, testing and labelling activities.

**1. Testing Frequency:**

The frequency of inspections that are outlined in **Section 2 of the Standard, AS/NZS 3760:2010** are recommended but can be varied subject to a risk assessment. The Australian standard includes a table that sets out testing and inspection intervals for various types of equipment from 3 months (for equipment that is high use, high risk, or hire equipment) to up to 5 years (for equipment that is not open to abuse, flexing of cords, etc). In addition to the regular testing and inspection, the standard specifies that electrical equipment is to be inspected and tested:

* before return to service after a repair or servicing, which could have affected the electrical safety of the equipment, and
* before return to service from a second-hand sale, to ensure equipment is safe.

Generally, the following should be followed:

* tools and leads: every 12 months (low use)
* Safety Switches: monthly
* Offices: every 3 to 5 years 2.

**2. Residual Current Devices**:

The fitting of Residual Current Devices (RCD) on certain equipment can considerably reduce the risk of electrocution. An RCD (also known as a safety switch) works by detecting a current leakage. When RCD detects this current leakage, it turns the power off almost immediately. Whilst an electric shock may still be received, the duration will be shortened reducing the risk of serious injury.

**3. Unsafe Equipment:**

Equipment that may be unsafe should be withdrawn immediately from service and have a label attached warning against further use. Arrangements should be made, as soon as possible, for such equipment to be disposed, destroyed, or repaired by an authorised repair agent or competent person. The BizOps Electrical Safety Policy provides further information in relation to this workplace hazard and its management. This Policy is included in the WHS Policies and Procedures Manual.

* 1. Confined Spaces

All confined spaces are to display placards warning access is strictly controlled. Entry requires the issue of a confined spaces permit on each occasion. No employee or contractor will be issued a permit to work in any confined space on the property unless they are trained and supervised. When working in a confined space a trained bystander must always be present . A register of identified confined spaces and entry permits is maintained at the office.

* 1. Falls from Height

There is a risk of serious injury from falling when working above ground height. No worker will work at height without ensuring that ladders, steps and handrails are secure or fall prevention/arrest harnesses are in place. These structures include, but are not limited to:

* Overhead fuel, water tanks and windmills
* Buildings and roofs
* High machinery; cherry pickers, trucks and trailers.

BizOps will ensure that:

* Workers working at height are made aware of the hazards and risk management procedures
* Fall arrest or fall prevention harnesses are provided and used
* Workers are instructed in the correct use of fall prevention or fall arrest harnesses.

Contractors will ensure that they:

* Observe and apply risk management procedures when working at heights
* Use the required personal protective equipment (PPE) where indicated.
  1. Manual Handling

Manual handling is any task that requires you to push, pull, lift, carry, move, hold or lower any object, person or animal. Manual tasks include tasks that have repetitive actions, sustained postures and may involve exposure to vibration. The types of injuries related to manual handling include repetitive strain injuries, muscle injuries, tendon and ligament injuries, bone injuries and injuries from falling objects.

Manual handling hazards are managed at BizOps by a risk management process in order to prevent or minimise the risk of injuries caused by manual tasks.

The process involves conducting a risk assessment on manual tasks carried out in the workplace, working out how to address any problems, choosing and implementing appropriate solutions, and following up to check that the solutions work. Examples of manual handling tasks in the BizOps environment include:

* lifting and moving equipment
* mustering
* fencing
* general repairs

**Preventing Manual Handling injuries**

* decide what changes can be made to reduce the risks of injury. If possible, select permanent changes (such as workplace layout, tools and equipment)
* avoid double handling of items
* provide mechanical aids (hoists)
* redesign the task (such as rotating workers)
* identify changes that are possible immediately, and those that may take time to implement
* document your risk control decisions for each task assessed, and set timelines for changes
* trial the changes in consultation with workers before making them permanent
* provide training if new equipment is introduced.

**When loading/unloading vehicles**

* use lift equipment wherever practicable, otherwise
* prepare by stretching and warming up, especially after prolonged sitting in the vehicle
* slide the item as close as possible to you before lifting
* keep you back straight and bend your knees when lifting
* put loads down in the same manner in which they were picked up
* where possible store frequently used items at a suitable height; between waist and shoulder height, which reduces the need for forward bending when lifting, and
* whenever possible use trolleys for moving larger and heavy items
  1. Plant and Equipment

The definition of plant encompasses hand tools either powered or non-powered (electric drills, hammers) and extends to farm machinery, office furniture and any other equipment used for work purposes.

**Risk Management**

A risk management process is a systematic method for making plant as safe as possible and can also be incorporated into other workplace risk management systems. This risk management approach should be undertaken before purchasing of, or alterations to plant, changing the way it is used, relocating it, or if additional health and safety information becomes available.

**Maintenance and repair**

Plant must be maintained and cleaned following the procedures recommended by the designer or manufacturer or by a competent person. Only a competent person may inspect and repair damaged plant.

Unsafe and/or malfunctioning plant and equipment can be identified by any manager, worker or contractor by a number of methods such as:

* equipment inspections;
* verbal reporting of equipment malfunction to the appropriate manager
* hazard and incident reporting.

Once identified, the unsafe or malfunctioning plant/equipment should be reported to the appropriate manager in order for repair to be organised. Plant/equipment which has been identified as unsafe should be disconnected from the power supply and clearly labelled as unsafe and not be used. If possible, the plant/equipment should be moved to a location where it is not accessible.

**Record Keeping**

Records of inspection, testing and monitoring are required to be maintained by BizOps. As a minimum, records should include details of inspections, maintenance, repair, calibration and alteration of plant.

* 1. Personal Protective Equipment

Personal Protective Equipment (PPE) may be required to protect managers and workers during general, specific and hazardous tasks. PPE is the least effective way to control risk and is always the last resort to protect workers. The types of PPE used at BizOps might include:

* respirators and masks
* foot protection (safety shoes and boots)
* body protection (high visibility clothing, long sleeves, wide brimmed hats, gloves)
* helmets
* any substance used to protect health, for example, sunscreen.

If required, workers are obliged to use PPE when required and when reasonably practicable. Other requirements include:

* workers should be fully trained in the safe use, storage and maintenance of PPE
* PPE must be checked before use for the correct type, fit and undamaged
* do not reuse disposable, contaminated or damaged PPE
* store PPE correctly
  1. Slips, Trips and Falls

Slips, trips and falls are one of the major types of accidents in workplaces and may be due to poor housekeeping practices such as water or oil spilt. Material placed untidily or using walkways for storage can also be a cause of these types of incidents. When assessing the potential for slips, trips and falls, make sure you look at out of sight areas such as storage rooms, stairways and workshops.

**Prevention**

Reduce the risk of injury by following these guidelines:

* avoid walking on slippery floors
* keep floors free of water and grease
* clean floors regularly
* post warning signs around spills or wet floors
* install non-slip tiling or other non-slip floor products
* use rubber mats in areas where the floors are constantly wet
* use non-slip footwear
* clean up spills immediately
* install adhesive strips and slip resistant paint to improve slip resistance. The best method will depend on the existing floor surface.
* use floor cleaning products to remove oil and grease
* agree on written standards with contract cleaners to ensure that any cleaning agents leave the floor in a non-slip condition
* use storage areas for equipment and be alert to the dangers of leaving boxes, rubbish, bags and furniture in walkways, entrances and exits.
  1. Drugs and Alcohol

BizOps maintains the right to refuse work to any worker or contractor who, in the opinion of management, is in an unfit state to perform their work in a safe manner.

To assist in these requirements BizOps workers, contractors and visitors shall observe that:

* No alcohol may be consumed or permitted on property at any time unless expressly authorised by management and only when work is completed for the day
* No illegal drugs shall be consumed or permitted on property at any time or under any circumstance
* If, in the opinion of management, a worker is unfit to work safely, they will be sent/taken home
* Workers who are taking prescription medication that may affect their safety at work (that cause drowsiness), are to inform management of the circumstances so that appropriate duties may be assigned

BizOps encourages all employees not to smoke. Please do not smoke in any vehicle, tractor or building.

* 1. UV Ratiation

Ultraviolet radiation (UV) exposure can cause sunburn, skin and eye damage and skin cancer. UV protective clothing, hats, sunglasses and SPF 30 sunblock will be provided as PPE and are required to be worn for outdoor tasks.

* 1. Vehicles

**Alcohol and Drugs**

BizOps managers and workers must not drive a personal or BizOps vehicle on work related business in circumstances where that member would breach applicable road transport law by driving under the influence of alcohol or drugs.

**Licences**

BizOps managers and workers who are required to drive a vehicle on work related business must hold a current valid driver’s licence of the appropriate class and notify the Station Manager if the licence is suspended or revoked. A copy of the current driver’s licence must be provided to the Station Manager or their delegate to be retained on file.

**Mobile Phones**

The use of a hand-held mobile telephone while driving is a safety risk and is against the law. BizOps managers and workers are not to use a hand-held mobile telephone while driving a motor vehicle or other motorised equipment at a BizOps workplace.

**Seat Belts**

It is a legal and BizOps requirement that seat belts are worn at all times in a moving vehicle. The driver is responsible for ensuring that all passengers wear a seat belt when the vehicle is in motion on a public road or at a BizOps workplace.

**Smoking**

Smoking in any BizOps vehicle by either drivers or passengers is prohibited.

**Load Restraint in Vehicles**

* All equipment in vehicles must be restrained firmly in order to avoid the risk of the items becoming airborne and causing missile injuries in the case of a vehicle collision
* The tension in the load restraining straps should be checked regularly during the journey
* Distribute the load evenly within the vehicle
* Ensure no loose items are within the passenger area as they may become projectiles in the event of an accident.

Do not exceed load/weight capacity of the vehicle.

* 1. Working Alone

The risk of injury or harm for people who work alone may be increased because of difficulty contacting emergency services when they are required. Emergency situations may arise because of the sudden onset of a medical condition, accidental work-related injury or disease, attack by an animal, exposure to the elements, or by becoming stranded without food or water.

The consequences of an incident arising when working alone may be very serious so BizOps managers and workers shall implement the following for each alone work task:

* a telephone call to home base on arrival and departure at a remote work site
* development and approval of trip itineraries for extended trips and adherence to the itinerary
* pre-trip agreement on departure and arrival times and accommodation arrangements
* for travel in remote areas an emergency location beacon should be carried in the vehicle
* pre-arranged mobile/satellite phone calls at scheduled times
* appropriate first aid kit
* enough water for emergency purposes.

1. Report for Main Office Refurbishment
   1. Report details/key points

**(6) Strategies for working with contractors and their representatives to set up and maintain participation arrangements according to relevant WHS legislation.**

Under the *Work Health and Safety Act 2011* (WHS Act), a contractor is a worker and is owed duties by the person conducting a business or undertaking (PCBU). ( (Contractor management).

BizOps is committed to provide appropriate training to ensure every worker is aware about WHS obligations, and so on contractors. A thorough WHS induction process ensures that they are able to work safely.

To ensure health and safety in the workplace, BizOps PCBU should select contractors based on their expertise and their work health and safety record.

Since contractors can be hired for short amount of time or for different sectors in the company, a full WHS training would not be recommended. Training has to be adapted to each case. An online Induction required before working on site could be provided as a general guide for setting a standard for safe work, minimising risk and reducing the training time at BizOps.

Each new contractor coming to work at BizOps should:

* receive a**Contractor WHS Training**—induction training, emergency procedures and location of facilities. (refer to 5 - Detailed WHS Induction Checklist for Contractors 2019)
* follow a**Task Specific WHS Training**if needed, according to the tasks defined in their contract.
* be provided with a copy of the **BizOps Safety Briefing Handout** to read, and to then sign, acknowledging that they have read and understood the information.(refer to 4 - WHS Induction for Contractors Visitors)
* sign the **WHS Training Register** to record the training received ( refer to 6 - WHS Training Register).Training records shall be maintained as evidence of training delivery and assessment of competence.

Contractors also have a duty as workers under the WHS Act. While at work, a contractor must take reasonable care for his/ her own health and safety and take reasonable care that their acts do not affect the health and safety of others. (The WHS Act and contractors in the Commowealth)

**(10) Ensure new hazards are not created by the proposed changes and existing hazards are controlled.**

It is essential that BizOps identify hazard identification as early as possible in the planning, designing and evaluation of the BizOps expansion plans.

The following changes require consideration before, during and after the store renovations;

* the hiring of new workers
* relocation of staff
* reorganisation of fixtures and fittings to create additional space
* staff training
* the use of heavy equipment
* the protection of traffic and pedestrians

Risk identification is required to identifying the events that, if they were to occur, could have a negative impact on the organisation. Refer to Chapter 3.6 WHS Risk Assessment for a detailed approach to Risk identification.

Once the risk identifications have been established, then it’s time to implement the Risk Control Plan using the following procedures;

1. **Implement Failure mode and effect analysis (FMEA) which is a process analysis tool that gives a step-by-step approach to identifying all possible failures in the BizOps Office Refurbishment Plan.**
2. **Re-assess the company induction, staff policies and procedures manuals and all other WHS documentation that are relevant to this situation.**
3. **Conduct weekly WHS meetings to discuss the issues and to receive feedback from workers regarding possible solutions to plan WHS strategies.**
4. **Document and record the plan including allocating times, resources and hazard evaluation measures. Ensure PCBU is informed of all elements of the plan.**
5. **Inform staff of changes using one or more of the following procedures;**
   * **induction forms**
   * **staff procedure manuals**
   * **WHS documentation**
   * **signs**
   * **WHS meetings and training.**
   * **Newsletters, staff notifications, emails or other form of digital notification.**
6. **Monitor and review plan for its effectiveness and appropriateness. Plan for an ongoing evaluation. Ensure HSR is invited and involved in all ongoing procedures.**

(11) **Establishing, implementing, maintaining and evaluating procedures for effective identifying hazards?**

(14) **Person responsible for developing, implementing and reviewing policies, procedures and processes in accordance with organisational and legislative requirements.**

(15) **Identifying inadequacies in existing risk controls according to the hierarchy of control and WHS legislative requirements.**

(16) **The objective for promptly supplying resources to enable implementation of new measures.**

(17) **The systematic analytical processes used to assist in gathering relevant BizOps information.**

To help identify information pertaining directly to the BizOps workplace health and safety, documents, records, and procedures developed or taken by BizOps were identified and examined, such as:

**Forms:**

* Hazard identification form
* Hazard reporting form – this should be made available on the organisation intranet and in the health and safety manual for the BizOps work area.
* Notifiable incident report form – this should be made available on the organisation intranet and in the health and safety manual for the BizOps work area.

**BizOps Policies & Procedures:**

* Risk management policy – this should be made available on the organisation intranet
* Risk management procedure
* Risk management plan

**Actions Taken:**

* Regular evaluations – these are to be conducted at least twice a year.
* Inductions
* Implementation of software programs – used to input, store, and retrieve information pertaining to WHS procedures and the BizOps health and safety policy.

To build the report’s background and inform the health and safety management system, information pertaining to business operations were identified and examined, such as:

**Planning & Management:**

* Business plan
* Operational plan
* Company profile
* Vision, mission, & values

**Documentation & Communication:**

* Document style guide
* Project scope template

The validity and reliability of the above BizOps documentation is upheld by further secondary data collection methods, with data obtained from governmental, authoritative, and regulatory sources and quality systems, including, but not limited to:

* Comcare
* WorkSafe WA
* Safe Work Australia
* International Organization for Standardization
* Standards Australia

Through the analytical methods of benchmarking (measurement and comparison of selected indicators) and gap analysis (describing current and target states), the information gathered could be used to inform the BizOps Work Health and Safety Management System Report.

(18) **Identifying and evaluating options against agreed criteria.**

Too ensure effective implementation the company will complete follow-up assessments of risk controls designed for identified hazards:

These assessments will refer to and use a combination of:

* Post control risk assessment - second qualitative risk assessment.
* Work practices and behavioural observation
* Key stakeholder surveys
* Analysis of WHS records i.e. incident, accident and near miss reporting

It is critical that this second risk review is an open discussion and uses established WHS reporting data to inform decisions.

To enable this the following should be in place:

* Participation agreements and committees should review and inform current risk control measures
* WHS Records should be complete, current and open to review by relevant all business stakeholders. Appropriate WHS specialists should also interpret & report “safety trends” within the business from this data.
* Regular WHS auditing will be scheduled to review risk control effectiveness and employee/management culture and adherence to established risk control measures.

Failure modes in implemented risk controls should be reviewed using the attached risk control worksheet below. This report should be completed by a recognised WHS representative and identify the underlying reason/s for the control failure from the following options:

1. Workplace culture
2. Organisational commitment
3. Level of compliance
4. Environmental pressure
5. Workforce characteristics
6. Organisational structure
7. Ineffective consultation
8. Inadequate Installation

**Risk Control Worksheet**

1. **Factors Assessed as a risk**

Is the job necessary **YES** - Proceed to question 2

**NO** - Eliminate task (list options below)

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\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. **Is the reduction of risk by use of engineering controls practical?**

|  |  |  |
| --- | --- | --- |
| Category | Options or actions | Timeframe |
| Short term |  |  |
| Medium Term |  |  |
| Long term |  |  |

1. **Is the reduction of risk possible by use of administrative controls?**

|  |  |  |
| --- | --- | --- |
| Category | Options or actions | Timeframe |
| Short term |  |  |
| Medium Term |  |  |
| Long term |  |  |

1. **Is the reduction of risk by use of personal protective equipment and clothing practical?**

|  |  |  |
| --- | --- | --- |
| Category | Options or actions | Timeframe |
| Short term |  |  |
| Medium Term |  |  |
| Long term |  |  |

1. **Please describe the risk controls in the workplace**

|  |  |  |  |
| --- | --- | --- | --- |
| Questions | Yes | No | Comments |
| Are risk control measures in place |  |  |  |
| Are there and problem areas or workers who consistently hinder WHS improvements? |  |  |  |
| Do risk controls actually achieve a reduction in risk as planned? |  |  |  |
| Have changes created and new hazards or unanticipated effects? |  |  |  |
| Is this reduction in risk likely to be ongoing? |  |  |  |
| Does your organisational budget for implementing and maintaining health and safety risk controls? Please specify |  |  |  |
| Is it possible to make further improvements to increase the reliability and effectiveness of the risk controls? |  |  |  |
| Are there any lessons to be learnt that can be applied to other health and safety risks or risk control processes? |  |  |  |

(19) **Identifying requirements for requesting expert WHS advice.**

BizOps would seek expert WHS advice in the situations outlined below to ensure minimal impact on stakeholders and proper compliance with relevant legislation/regulations:

* Developing and implementing systematic approaches to managing health and safety, and risk management;
* Designing roles, equipment and the work environment to suit workers and ensure health, safety and productivity are maintained;
* Identifying, assessing and controlling chemical, physical and/or biological agents that could impact the health of workers;
* Monitoring and evaluating the impact of toxic materials and radiation on the health of workers, the environment and future technology;
* Establishing, implementing, maintaining and evaluating WHS processes, policies and procedures;
* Identifying inadequacies in existing risk controls according to the hierarchy of control and legislative/regulatory requirements;
* Dealing with specific WHS issues arising in the course of business, where insufficient knowledge or expertise is held by existing personnel; and
* Assisting to make sound WHS decisions, in accordance with legislative/regulatory requirements.

(20) **Training program development.**

(22) **Maintain WHS records to identify patterns of occupational injury and disease**

BizOps maintains the following records to assist in identifying patterns of occupational injury and disease:

1. Risk Management Plan;
2. Register of all incidents and accidents;
3. Hazard checklists and audit results;
4. Workers Compensation Report forms; and
5. Accident or incident investigation reports.

(23) **Record WHS decisions according to organisational requirements**

Decisions will made by the safety and health comity and recorded by the HR Admin team through the meeting minutes.

The minutes will be retained in accordance with the organisation’s WHS record keeping policy, which states (BizOps Work Health & Safety Management System (WHSMS) Report 2019);

‘The WHS Officer and Operations Manager should retain all WHS and workers compensation documents. These documents are required to be filed for 30 years in safe storage accessible only to authorised personnel in accordance with the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)’.

(24) **Measure and evaluate the WHSMS in line with BizOps quality systems frameworks.**

(25) **Methods used to establish, implement, maintain and evaluate a WHSMS**

(26) **Development and implementation of Improvements to the WHS management system**

BizOps took a proactive approach to developing and implementing the new WHSMS by:

* Researching new and more effective equipment, systems and work practices;
* Seeking advice on how to address legislative/regulatory requirements;
* Setting deadlines for implementing changes;
* Clearly assigning responsibility;
* Monitoring the implementation process;
* Implementing a procedure to review the revised arrangements to assess their effectiveness and value to the organisation.

(27) **Plans that were developed to manage relatively complex WHS management tasks with an awareness of how they may contribute to longer-term operational and strategic goals.**

(28) **Ensuring compliance with the WHS legislative framework to achieve, as a minimum, WHS legal requirements.**

* 1. Summary of key points
* establish the WHS Risk Assessment Plan and the Risk Control Plan including the FMEA
* all business activities must undergo risk assessment prior to commencing and then undergo risk management throughout
* risk identification, analysis, evaluation and treatment must be reported and recorded in the BizOps risk register.
* expert advice will be required to ensure minimal impact on stakeholders and proper compliance with relevant legislation/regulations
* additional resources required including delivery van, video conferencing equipment
* a training consultant will be required to provide additional training resources
* ensure a thorough WHS inductions process for workers according to the Work Health and Safety Act 2011 (WHS Act).
* contractors will only be hired for a short amount of time or for different sectors in the company therefore training must be adapted to each case.
* maintain WHS records to identify patterns of occupational injury and disease
  1. Conclusion/recommendations

The following are my recommendations for the BizOps renovation plans;

* Identify the WHS risks to the plan before, during and after using the WHS Risk Assessment.
* Implement FMEA to identify all possible failures in the BizOps Office Refurbishment Plan.
* Implementation and development of improvements to the WHS management system will require;
  + the research of new and more effective equipment, systems and work practices
  + seeking advice on how to address legislative/regulatory requirements
  + setting deadlines for implementing changes
  + clearly assigning responsibility
  + monitoring the implementation process
  + a procedure to review the revised arrangements to assess their effectiveness and value to the organisation.
* Seek WHS expert advice in all WHS Management procedures including the design, development, identification, monitoring, establishment and evaluation of all activities and how to address legislative/regulatory requirements (see 19 expert advice for a detailed listing).
* Contractors should be selected based on their expertise and their work health and safety record.
* **Re-assess and change accordingly the company induction, staff policies and procedures manuals and all other WHS documentation.**
  + **To adapt WHS training for each Contractor, it is recommended to provide an online induction before working on site as a general guide for setting a standard for safe work, minimising risk and reducing the training time at BizOps**
  + **Contractors/Visitors to receive and sign where required all WHS Training Documentation as listed in detail previously.**
* **Conduct weekly WHS meetings to discuss the issues and to receive feedback from workers regarding possible solutions to the BizOps plan.**
* **Document and record the plan including allocating times, resources and hazard evaluation measures.**
* **Inform staff of changes using the following procedures;**
  + **induction forms**
  + **staff procedure manuals**
  + **WHS documentation**
  + **signs**
  + **WHS meetings and training.**
  + **Newsletters, staff notifications, emails or other form of digital notification.**
* **Monitor and review plan for its effectiveness and appropriateness. Plan for an ongoing evaluation.**

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