

PBS Project EHS Plan.

Project Name:

Project Number:



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1.0

INTRODUCTION



1.0 INTRODUCTION



1.1 ABOUT US

PBS Property Group, and our relevant entities (PBS), is an award-winning leader in our industry.

We project manage, design, and construct property developments including but not limited to:

- residential
- commercial
- industrial
- retail
- office
- apartment
- aged care
- mixed-use

We started as a residential builder in the Australian Capital Territory (ACT) in the late 1980s. We then expanded into Sydney in 1998, followed by Brisbane and Hervey Bay in Queensland.

Guided by our directors, we value excellence in environment, health, safety and quality (EHS&Q) practices.

We aim to inspire, innovate and deliver in every project and place we work in Australia. This philosophy guides our teams as they deliver valued solutions for our customers and complete each project safely, on time, and on budget.

We have teams in the ACT, Queensland and New South Wales, and we actively participate in the communities we work in.

Directly and through our staff and contractors, we establish and maintain effective:

- work environments
- equipment
- training
- systems

This helps us ensure healthy, safe, and learning workplaces.



1.2 HOW WE OPERATE

We have a board of directors and a senior management team. They provide direction and strategy which supports our business.

Our corporate team oversees our business systems and our ICT, EHS, HR, marketing, and finance departments.

We operate in NSW, ACT and QLD and have offices in each location. Each location is a separate business division.

Each business division is led by a general manager who is supported by construction managers and commercial managers. They give our site teams direction and assistance.

Site teams may include a:

- project manager
- site manager
- general foreman
- EHS&Q manager or coordinator
- contracts administrator
- engineer
- cadet and construction workers

There won't always be all of these people in each team. Sometimes 1 person will take on multiple roles. We explain who is responsible for what in our Roles and Responsibilities for each site.

You can see our organisational chart and how we report to one another in [Annexure 1](#) of the Management System Manual.

1.3 OUR COMMITMENT TO ENVIRONMENT, HEALTH, AND SAFETY

Our highest priority is the environment, health and safety (EHS) of our workforce.

We tailor every Project EHS Plan to make sure it addresses the specific needs of the project.

1.4 WHAT WE MEAN WHEN WE REFER TO COMMON JOB TITLES

When we say a job title in this plan, such as "general manager" or "construction manager", we mean the person who is responsible for the role in this specific project.

For example, if this plan is for a project in NSW and we say general manager, we mean the general manager in NSW.

If this plan is for a project in ACT and we say general manager, we mean the general manager in the ACT.



1.5 DEFINITIONS

We define terms in this document in [Annexure 11](#).

1.6 OUR POLICIES

In workplaces we follow processes that proactively:

- manage the environment
- protect the safety and wellbeing of all employees, contractors and people in the community

We develop our policies with a range of employees and senior management. Senior management are 100% committed to all of our policies.

You can find our policies on our intranet. We also communicate them when we induct employees and site personnel, and clearly display them in our workplaces (in offices and at construction sites).

We have these policies:

- [Discrimination, Bullying & Harassment Policy](#)
- [Environment, Health and Safety Policy](#)
- [Freedom of Association Policy](#)
- [Impairment \(Alcohol and other drugs\) Policy](#)
- [Industrial Relations Policy](#)
- [Injury Management and Return to Work Policy](#)
- [Quality Management Policy](#)
- [Smoking Policy](#)

We evaluate policies at least once a year to make sure they are still relevant to our business and the work we do.

If we don't make any changes, we approve and sign off on each policy at least once every 2 years.

The public can read our Environment, Health and Safety Policy here on our website:

<http://www.pbsbuilding.com.au/about-us/>



1.7 OUR MANAGEMENT SYSTEM

Our Management System integrates all the tasks we do to manage our business and projects.

We want information to flow seamlessly between our main processes. This helps us produce a high quality and safe product for our customers, on time and on budget.

The Management System explains the framework and procedures for how we deliver any service we offer. This includes how we plan, deliver and handover our construction projects.

We structure the Management System to make it easy for us to follow a **continual improvement cycle**: Strategy > Implement > Improve.

You can find our Management System on our intranet.

This diagram shows how certain requirements influence our policies and the way we structure our Management System:

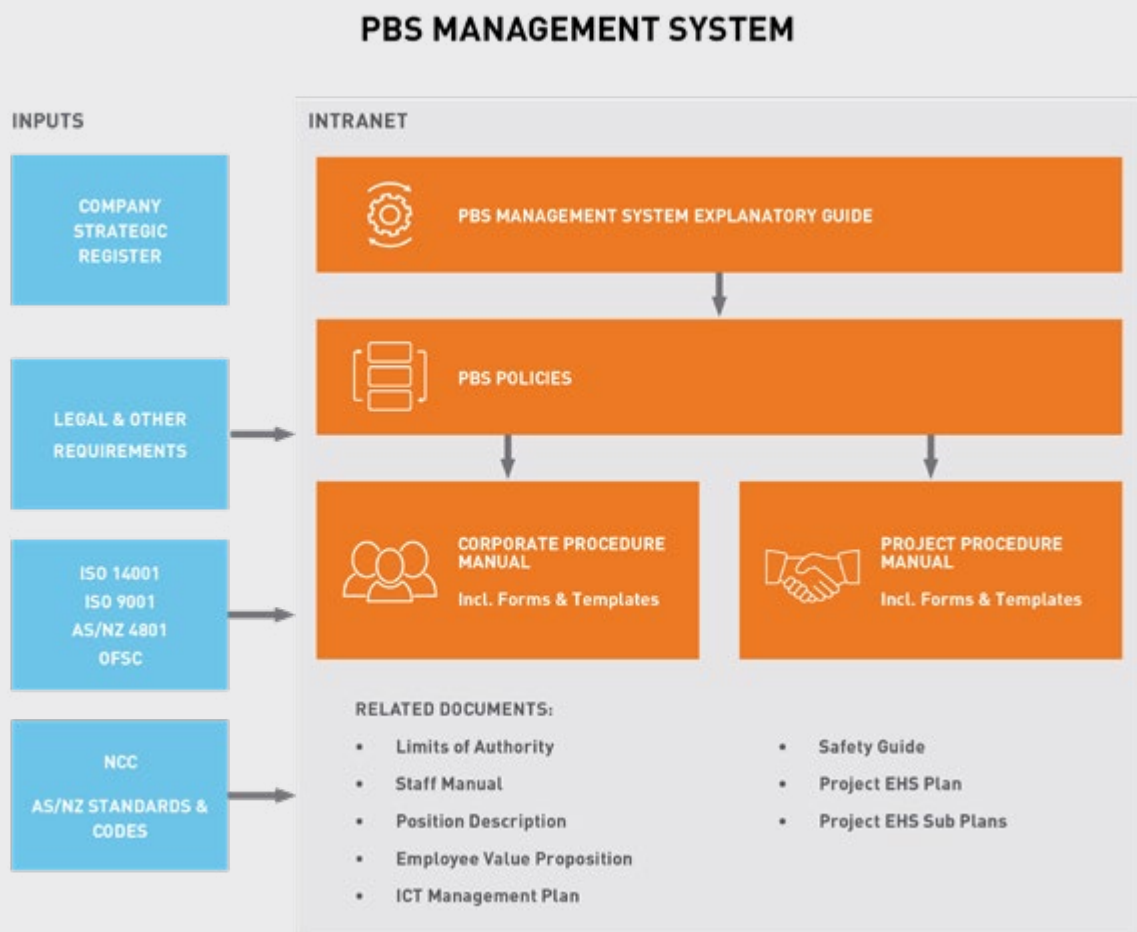


Diagram 1 – An overview of our Management System



1.8 ABOUT THIS PROJECT EHS PLAN

1.8.1 What this plan is designed to do

We use a Project EHS Plan to manage all EHS aspects of a project, including key risks.

The Project EHS Plan:

- is the main document within the [Project Procedure Manual](#)
- includes related sub-plans
- includes the [Project Risk Register](#)

We follow the requirements in [Section 1.4.6](#) of the Management System Manual to decide if we need a Project EHS Plan for a project.

To prepare the plan, we use the EHS Plan template on our intranet and in Procore.

1.8.2 The role of the Project Procedure Manual

This Project EHS Plan is contained within the Project Procedure Manual.

The Project Procedure Manual has a sophisticated set of EHS&Q procedures, and details how we manage:

- the environment
- the quality of our work
- workplace health and safety

[Chapter 11](#) and [Chapter 12](#) of the Project Procedure Manual have instructions on how to implement EHS&Q procedures for this project.

1.8.3 The role of the Project Risk Register

The Project Risk Register is a live document we must use in all workplaces.

It captures all of these we identify for EHS&Q:

- Aspects & impacts
- Hazards & risks
- Legislative requirements

This allows us to implement controls to eliminate or mitigate risk, or reduce harm if a risk occurs.

[Section 2.1.1](#) of this plan details how we complete and use the [Project Risk Register](#).



1.8.4 The role of Project EHS Sub-plans

We use the [Project Risk Register](#) to determine if we require an EHS sub-plan. Sub-plans detail how we manage specific risks that apply to a project.

We link controls in the Project Risk Register with relevant sub-plans. The sub-plans show how we implement and monitor controls to ensure they are effective and efficient.

These 3 sub-plans are mandatory on all projects that require a Project EHS Plan:

- [Quality Management Sub-Plan](#)
- [Emergency Management Sub-Plan](#)
- [Fit for Work, Alcohol and Other Drugs Management Sub-Plan](#)

[Section 2.1.1](#) shows how we decide if other sub-plans are needed for this project.

1.8.5 How these documents align

We use all of these documents together with our [Management System Manual](#) (the Manual).

The Manual details:

- the framework and procedures for how we deliver any service we offer
- how we plan, deliver and handover our construction projects
- how we manage EHS&Q in our workplaces

You should read the Manual when you read this plan.

Together, these documents and this framework form our Management System.

The Management System as a whole achieves and holds third party certification, including:

- Australian and international standards for safety, quality and the environment
- accreditation with federal and state authorities



1.9 REVISIONS AND CHANGES TO DOCUMENTS

1.9.1 How we control documents and data

The EHS&Q general manager controls all relevant EHS&Q documents and data.

They must:

- ensure the current version is up to date and others can access it on the intranet
- update us by email if anything is added to or deleted from a document, or if it changes
- archive irrelevant or superseded documents and remove copies from the workplace

We name documents on the intranet this way so it's easy to identify them:

Location.document number, name, (revision number)

e.g. **P11.01 Project EHS Plan (Rev V)**; where P11 stands for Project Procedure Manual Chapter 11.

Our intranet has a document control register which shows:

- who owns the document
- when the document was created
- the document number we assign to it
- if the document has been revised and when

After a document is downloaded or printed, we call it 'uncontrolled'.

We use 2 software platforms to help us implement and meet the requirements of our Management System. These are called **Procore** and **SignOnSite**.



1.9.2 How we revise this plan and the EHS Plan template

Revisions to this plan

Table 1 shows the revision history of this plan. Any changes must be recorded in this table.

Either the EHS&Q manager, project manager, or an approved representative audits all of these once every 3 months:

- This Project EHS Plan
- The [Project Risk Register](#)
- Any related sub-plans

They do this to check if any changes are required.

If changes are required, we follow these steps:

1. Make the change
2. Update the date and revision number on the front page
3. Complete all the columns in **Table 1** to record and explain the change
4. Keep a record to show we've communicated the change (we keep this with the new version)
5. Archive the old Project EHS Plan, but keep it available for future audits

If there are minor changes to this plan, we re-issue this plan to all staff and contractors. We do this regularly, and at least within 3 months of the change.

If there's been a change to best practice since the date of the last revision, we update the [Project Risk Register](#).

Revisions to the EHS Plan template

If there is a major change to the EHS Plan template, we must implement the change across any active construction projects within 3 months. This starts from the date the EHS&Q general manager approves the change.

We update the template footer to show the latest version and the date it was released.

After we update the template, we will email all staff the changes that were made.



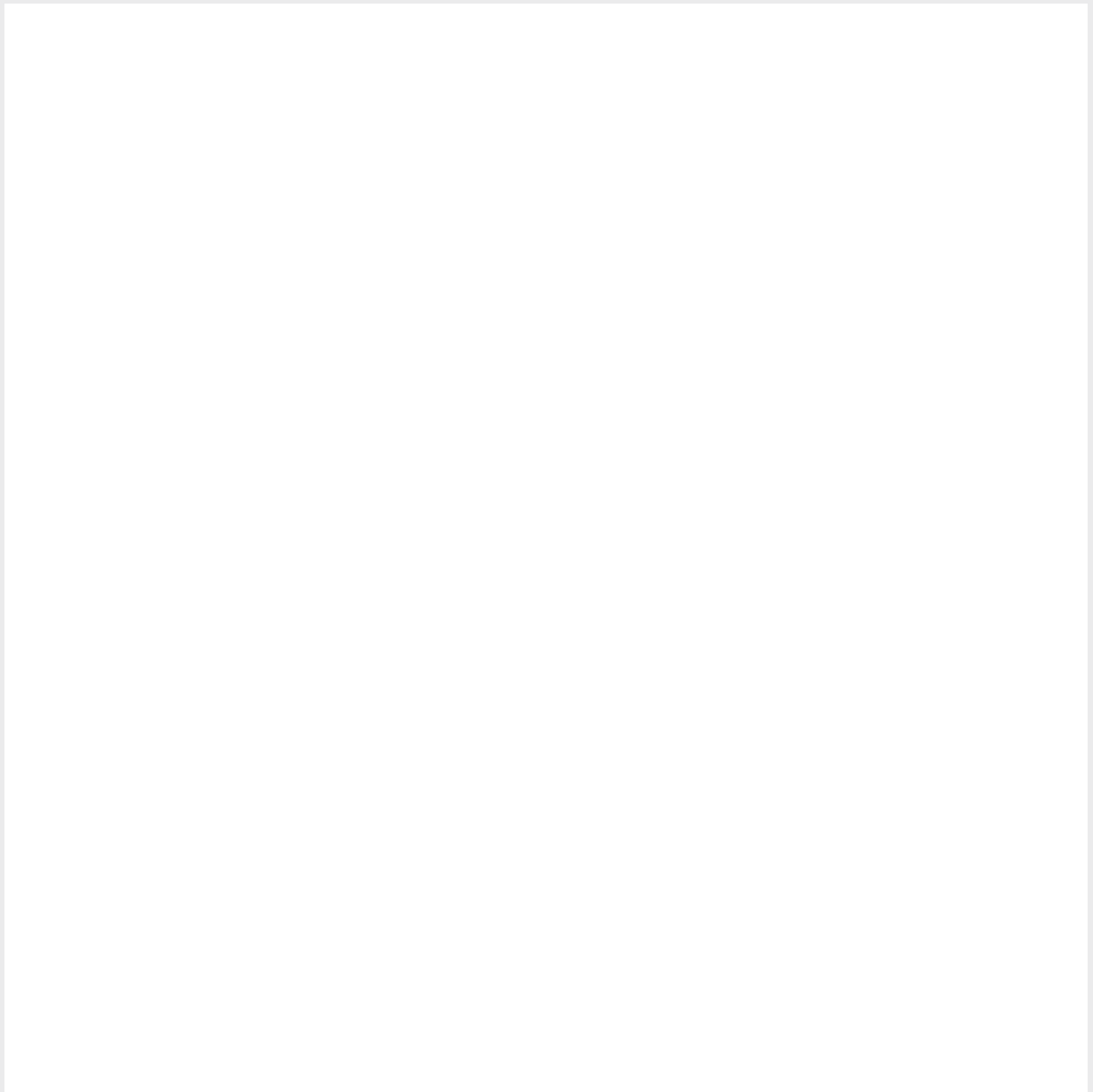
1.10 ABOUT THIS PROJECT

1.10.1 Project team

The construction manager and project manager prepare an organisation chart specific to this project. You can find this in [Annexure 3](#).

It includes the names and positions of key people who work on this project and how we report to one another.

1.10.2 Project site location





1.10.3 Type of contract

1.10.4 Project description



2.0

STRATEGY



2.0 STRATEGY

2.1 RISK MANAGEMENT PROCEDURE

Our highest priority is the health and safety of people who:

- we employ
- we engage to work at our workplaces
- occupy or use the buildings we construct

We value communication and transparency with our contractors, because it helps to combat risks associated with our work.

Our work involves high risk activities, so we follow management systems and processes to reduce these risks.



2.1.1 EHS risk management

Project Risk Register

All of our workplaces must have a [Project Risk Register](#).

The register is a live document that captures identified EHS&Q impacts, hazards and legislative requirements. It also helps us identify and implement controls to reduce the risks.

[Section 2.2](#) details how and when we use the [Project Risk Register](#).

Permit system

We use a permit system for certain high risk construction work.

It includes activities that may not be classified as high risk, but we rate them as a risk that could cause serious harm or injury to a worker and have decided to implement additional controls.

You can find more information about permits in [Section 3.8](#).

High risk safe work method statements

All high risk construction work requires a high risk safe work method statement (HR SWMS). Each HR SWMS must be specific to the project and activity it relates to.

[Section 2.2.1](#) details how and when we use a HR SWMS.

Risk management plans from external parties

If an external party gives us a specific Risk Management Plan, we add any new risks from their plan to our [Project Risk Register](#).

For example: traffic management, demolition, or asbestos removal.

Approval of sub-sub contractors

If a subcontractor plans to sub-sub-contract part or all of their work, they must give us all EHS&Q and legal documents when they tender for the project.

The construction manager or project manager decides if they will approve it.

On-site safety

Our employees, contractors and visitors must comply with all:

- instructions we give at site inductions
- relevant policies, plans and procedures for safety

We clearly and regularly communicate these at the start of a project and throughout its lifecycle.



2.1.2 Design risk management

We must ensure the design of a building does not impose a risk to a person's health or safety during construction.

We have extra responsibilities after construction, if the main contract says we are responsible for part or all of the design of a building, structure, or temporary structure.

If we are, the project manager (or another person we appoint) completes a [Risk and Opportunity at Design \(ROAD\)](#) review.

We do a ROAD review at these stages:

1. Estimating
2. Planning
3. Design development

We use the review to potentially eliminate risks that could occur during construction or after construction at the design phase.

The project manager and construction manager oversee any ongoing design changes that could significantly impact EHS, and add them to the [Project Risk Register](#).

If we are not responsible for any part of the design, the project manager reviews design documents from the client or their design consultant. This includes any [Design Safety Report](#).

They follow these steps:

1. Review EHS risks or opportunities
2. Record them in the [Design Safety Report Review template](#)
3. Inform the client or their representative the outcomes of the report
4. Add any ongoing risks to the [Project Risk Register](#)
5. Manage and track risks with the construction manager

We follow [Section 1.2](#) of the Manual if we manage a workplace, or the client gives us temporary access and control of a specific area to investigate:

- related works for a construction project that hasn't started yet
- minor works that do not meet the definition of a construction project
- minor works that involve high risk construction work

We use the Project Risk Register to document any unresolved risks we need to manage during construction that we identified in:

- the [Design Safety Report](#)
- the [ROAD](#) reviews
- any other Design Safety Report review



2.1.3 Quality risk management

We identify risks and implement controls to manage the quality of construction. This is important to minimise the need for re-work or to fix defects.

We complete various checks, tests, and verification at critical hold and witness point stages. This is to ensure construction activities meet the requirements of the contract.

We also implement a project-specific **Quality Management Sub-Plan** to monitor and control quality. This is mandatory for every project.



2.2 HAZARD IDENTIFICATION, RISK ASSESSMENT AND CONTROL (HIRAC) PROCEDURE

We follow a procedure to identify, assess and control risks.

This ensures that we:

- identify and record potential hazards
- assess the level of risk associated with each potential hazard
- define the controls needed to manage each hazard

The [Project Risk Register](#) is the main document we use for this process.

About the Project Risk Register

The [Project Risk Register](#) is a live document we develop before construction starts.

It captures all identified EHS&Q impacts, hazards and legislative requirements. It also helps us identify and implement controls to reduce the risks.

Elements of a Project Risk Register

OPEN RISKS FROM THE DESIGN PHASE

The [Project Risk Register](#) documents unresolved risks from the [Design Safety Report and ROAD reviews](#) that need to be managed during construction.

LEVEL OF RISK FOR ALL HAZARDS

The [Project Risk Register](#) documents and calculates the level of risk for all hazards we've identified in:

- this Project EHS Plan
- the workplace

We only list impacts, hazards and risks we rate as 'moderate' or above.

We control low risks via:

- routine standards
- procedures
- specific training

We also record any hazards that relate to specific high risk construction work. This work must have an associated [HR SWMS](#).

High risk construction work is defined in the [Harmonized Regulations, Section 291](#).



CONTROL MEASURES

The Project Risk Register details the specific and appropriate control measure(s) that relate to each impact and hazard.

The control measures are consistent with:

- the Hierarchy of Control in the Project Risk Register
- our Management System
- applicable legislation
- codes of practice
- Australian standards
- our Safety Guide

Our Safety Guide details our safety standards, and the minimum controls we use to combat risks.

We use the [Project Risk Register](#) to decide if we need additional EHS sub-plans. For example, to manage noise or cranes. Sub-plans that relate to this project are shown in [Annexure 1](#).

How we prepare and follow the Project Risk Register

We hold a workshop to prepare the [Project Risk Register](#). This involves our site team and other key stakeholders, such as:

- our client
- people from design and construction workgroups
- end users
- maintenance personnel
- government and community representatives (where appropriate)

If the construction will impact on external stakeholders such as;

- Local traffic conditions
- Neighbouring businesses, such as petrol stations, schools, shops, hospitals, airports
- Neighbouring residents
- Local council requirements

Then control measures and any feedback from these stakeholders, shall be recored in the [PRR](#) to eliminate or reduce the impact to as low as reasonably possible.

During construction, we manage and control hazards in the [Project Risk Register](#) with these methods:

- a. Forms on our intranet and in Procore that capture, control and monitor impacts and hazards
- b. Control measures in our [Safety Guide](#) and the sub-plans that are part of this plan
- c. A [HR SWMS](#) for tasks classified as high risk construction work by relevant WHS legislation
- d. Standard safe work processes
- e. Adequate supervision, instruction and training (that considers people's skills, experience and age)
- f. Routine inspections, including positive and negative observations
- g. Site audits and incident investigations
- h. Internal and industry alerts



We also consider other information to decide if a control is effective in managing impacts and hazards, and reducing the potential for workplace incidents.

If we need to communicate with key external stakeholders about hazards and controls, we do it either:

- directly via letter drops, public notice boards, or consultation sessions
- using the protocols for feedback set by the client

If we reference a third party document as a control measure in the Project Risk Register, it must be consistent with the Hierarchy of Control.

Who reviews and maintains the Project Risk Register

These people review the Project Risk Register to ensure it's accurate:

- Project manager
- Site manager
- EHS representative
- EHS&Q manager

They do this:

- when there is a change, including a design change, that could significantly affect EHS
- during project review meetings, while reviewing upcoming activities
- at least once every 3 months

Senior members of the site team maintain and control the live Project Risk Register on site.

How we communicate changes to the Project Risk Register

When we update the Project Risk Register, we tell all staff and contractors about the change.

We may do this by:

- an induction into the plan
- a toolbox talk
- a site-specific induction
- PRR updated on Sign on Site

We keep a record of who attends these in the Project Risk Register.

How workers should report a risk

Any worker can report a hazard or impact.

They can either:

- complete a Hazard Notification Form, available on our intranet
- create an 'Observation' in Procore and select 'Safety Hazard Notification'



2.2.1 High risk construction work

A high risk safe work method statement (HR SWMS) must be developed before we start any high risk construction work. It must be specific to the task and the workplace conditions.

Any contractor we engage for high risk construction work must submit a HR SWMS to us for approval before they start.

We follow the HR SWMS checklist to review every HR SWMS. The checklist helps us assess each risk individually and implement the proper control measures. If we uncover new risks to the project during this process, we add them to the Project Risk Register.

If construction work is not high risk, we do not require a HR SWMS. However, subcontractors must give us evidence that their employees, workers or other agents have been consulted or trained in routine safe work processes.

This may be via:

- training registers
- induction into the subcontractors WHS Plan
- toolbox talk
- contractor statement



2.3 MANDATORY PROCESS FOR EHS HAZARDS AND IMPACTS

Forms, checklists or templates are mandatory if they relate to impacts and hazards and we reference them in this plan.

2.4 LEGAL AND OTHER REQUIREMENTS

In the Project Risk Register, we list all of these that apply to this workplace:

- WHS legislation
- Environmental protection legislation
- Other legal or applicable requirements, such as codes of practice and standards

You can access current legal and other requirements in all of our workplaces. They are on our intranet or in the Safety Guide, or can be requested through the EHS&Q general manager.

Other key legislative requirements are available to the public via regulators and industry associations.

[Annexure 2](#) lists key legislation, including legislation that applies to this project.

We monitor and report all waste results and any other environmental reporting at the end of each month. We submit this information to the EHS&Q manager in the EHS report.

2.5 EHS RULES FOR THE WORKPLACE

The project team develops specific EHS rules for every site or workplace. We display these at the entrance to the workplace and in other prominent locations.

The purpose of the rules is to:

- manage WHS hazards and risks, and environmental aspects and impacts
- address any of our clients' requirements
- address specific legislative and regulatory requirements
- meet the standards in our Safety Guide
- ensure we record all visitors to the project in the Workplace Visitors Register or SignOnSite
- prevent or reduce the risk of harm to the environment, surrounding community, and other stakeholders

Anyone who enters our workplaces must comply with the requirements of our Alcohol and Other Drug Management Policy, and Drug and Alcohol Testing Procedure.

Our site teams must ensure every visitor sees and understands the rules for the site, and is recorded in the Workplace Visitors Register or SignOnSite.



2.6 OBJECTIVES AND TARGETS FOR EHS

We outline the objectives and targets for this project in this plan.

They focus our efforts, and help us achieve positive results for the environment and the health and safety of all workers and visitors to this workplace.

2.6.1 How we achieve EHS objectives and targets

We use the yearly EHS objectives and targets to set performance strategies for our project team.

These strategies ensure our project team:

- give positive reinforcement to our employees, subcontractors and service providers
- effectively train workplace personnel so they are competent in all work activities we engage them for
- upskill personnel who do not have adequate skills
- promote an inclusive culture on site
- create a healthy, positive and learning workplace environment
- regularly complete positive and negative observations and inspections
- report incidents in a reasonable time
- conduct thorough investigations, communicate effectively and evaluate corrective actions where required
- record and report on EHS progress against targets
- provide effective injury management and Return to Work programs
- effectively manage waste
- promote and implement strategies to protect the environment



2.6.2 How we monitor progress against EHS objectives

We consider these factors when we establish and review our EHS objectives and targets:

- Annual EHS requirements
- Legal requirements
- The views of interested parties
- Our options to address issues in the context of operational and business constraints

Our key EHS objectives and targets are listed in Section 2.6.3 (below). We report on progress against these in regular project review meetings. Annexure 10 outlines how we do this.

[Section 4.2](#) of this plan outlines how we monitor our workplaces.

We use the following methods to evaluate performance, and determine how effective any corrective actions we took were:

- EHS audits of the workplace, at least every 3 months
- External audits of certain projects, twice a year

We monitor and review all of the following to evaluate the EHS performance of our employees, subcontractors and workers:

- Workplace activities
- EHS management plans, where they apply
- HR SWMS
- Observations via our regular inspections, or inspections of service providers and the workplace EHS Committee



2.6.3 Annual EHS objectives and targets

Our EHS&Q objectives	Our EHS targets	Project target
LEAD INDICATORS		
These measure our processes, activities and conditions for performance and help us predict future results.		
APPRECIATION AND INCENTIVES All projects implement an appreciation and incentives program for EHS&Q. This drives positive reinforcement of best practice at a project level. We award employees, contractors and workers based on task observations, performance sampling and inspections, initiatives, or other ways.	Quarterly	1 every 3 months
KNOWLEDGE SHARING We share best practice initiatives and knowledge with the rest of the company.	100%	1 per project
CULTURE The project team must develop 1 or more positive initiatives for the project.	100%	1 per project
HEALTH AND WELLBEING All sites and other workplaces must implement at least 1 health and wellbeing initiative and evaluate the outcome. This could relate to healthy eating, medical assessments, mental health, better health, skin checks, exercise, green wall or indoor plants, hours of work to manage fatigue risks, or other initiatives.	100%	1 per project
LEADERSHIP AND PERFORMANCE Each site must complete minimum observation and inspection requirements. This positively influences performance outcomes. Procure: (Inspections = EHS site assessment checklist) (Observations = P&N Observations)	100%	Inspection: 1 per month Observations: 3 per week
LAG INDICATORS		
These measure processes that are linked to past events and give us data on past performance.		
Reduction in Lost Time Injury Frequency Rate (LTIFR) per million productivity hours.	<9	<9
Reduction in Medical Treatment injury Frequency Rate (MTIFR).	<8	<8
No injuries to the public as a result of our construction projects.	0	0
All incident investigations and related reports are completed and closed out on average within 10 days.	<10 Days	<10 Days
Reduction in falls of material and people incidents.	<18	<5
ENVIRONMENT		
Reduction in EPA Notices for environmental damage.	<1	<1
WASTE All projects must implement waste minimisation, material recycling, and re-use initiatives to promote resource recovery and divert waste from landfill.	>85%	>85%

Table 2 – Annual EHS objectives and targets



2.7 EHS TARGETS FOR THIS PROJECT

The project team must complete this table to detail how they will achieve the targets in [Section 2.6.3](#).

The project manager must ensure these targets are met. They report on progress at regular project review meetings.

Lead indicators	Description of the initiative	Implemented date	Evaluation date
APPRECIATION AND INCENTIVES			
APPRECIATION AND INCENTIVES			
APPRECIATION AND INCENTIVES			
APPRECIATION AND INCENTIVES			
APPRECIATION AND INCENTIVES			
APPRECIATION AND INCENTIVES			
KNOWLEDGE SHARING			
CULTURE			
HEALTH AND WELLBEING			
LEADERSHIP AND PERFORMANCE			

Table 3 –EHS targets for this project



2.8 HOW WE PROCURE GOODS AND SERVICES

We follow the requirements in the Project Procedure Manual when we procure goods and services.

The project manager must ensure procurement is in line with the:

- Project Procedure Manual
- Contract requirements
- Limits of Authority

2.8.1 and 2.8.2 (below) explain how we manage EHS when we procure goods or services.

2.8.1 Goods

Any goods we purchase must comply with the relevant Australian standards.

They must meet all of these when they are installed and used:

- Approved codes of practice
- Compliance codes
- Guidance notes from relevant government regulators or industry organisations

2.8.2 Services

We use the Contractor Performance tool in Procore to analyse and vet prospective tenderers.

After we shortlist a subcontractor, we assess them with our Record of Tender Interview form. We complete this during the tender interview.

The form ensures the tenderer has an EHS Management System that meets the requirements in [Section 2.8.3](#), or a system we see as equal to it.

We capture the safety performance of existing contractors using the Procore Contractor Performance tool which records:

- ongoing audit results
- completed lessons learned
- feedback and comments

We add this information to the contractor's name, and review it when we consider future contracts.



2.8.3 How we manage subcontractor EHS

Subcontractors and other workers must be able to plan and adequately identify impacts and hazards that relate to the work they do in a workplace.

The project manager, or person in charge of the tender process, must provide these to all sub contractors at tender:

- Project EHS Plan and related sub-plans
- Project Risk Register for the site, with any best practices
- Safety Guide
- EHS Contractors Compliance Guide
- HR SWMS checklist
- Other information that applies to the work they will do

This information is also included on the Record of Tender Interview form.

We use the Inspection tool in Procore ([see Chapter 11 of the Project Procedure Manual](#)) to complete tender interviews.

We use the Record of Tender Interview form to record any discussions with the subcontractor during the tender period.

During the interview, we also record these on the form and in the Letting Advice Responsibilities checklist:

- That the subcontractor received the safety information
- They have allowed for it in their response
- They comply with our EHS requirements

Subcontractors must give us these documents before they start work or do any work which requires these:

1. Evidence that they can supply competent or qualified labour to the project. For example: a training register for high risk construction work licenses. VOC's WHS Reg's 2011 – 17, section 39.
2. Electrical and equipment registers. WHS Act 2011, Section 19.
3. Evidence that they consult, communicate and collaborate. This can be achieved in various ways. For example, we require a minimum weekly toolbox talk from each subcontractor. WHS Reg's 2011-17, Chapter 3.
4. Hazardous Chemicals and Dangerous Goods Register and associated safety data sheets. We must be told if any hazardous chemicals or dangerous goods will be used on the project. WHS Reg's 2011-17, Clause 332.
5. Plant Risk Assessments for each piece of plant that will be used on site. WHS Reg's 2011-17, Clause 12.
6. HR SWMS for all legislated high risk construction work. WHS Reg's 2011-17, Clause 299.
7. Other project-specific requirements. For example, ours or our client's requirements.
8. Trade-specific plans. These are the asbestos removal, blast, demolition and traffic plans.

We communicate any changes to this plan or its related documents to all subcontractors.



Subcontractor supervisors must prove they've communicated the following to all of their workers, and any new workers during the project:

- This Project EHS Plan
- The Project Risk Register and any related sub-plans
- Any future revisions to this plan or the register

They can evidence this by completing our Project EHS Plan Communication Tool Box Talk template.

Any worker has the right to read this Project EHS Plan at any time. WHS Reg's 2011-17 Part 6.4.



2.9 IF THERE ARE UNEXPECTED FINDS ON SITE

If workers come across an unexpected hazardous material at one of our workplaces, they should move away from it and immediately tell one of our supervisors.

We follow this procedure when we find an unexpected hazard on site:

1. Stop work and evacuate the area immediately.
2. Contact one or more of our staff members .
3. If safe, put up barricades to isolate the area. If possible, place the barriers 10m from the suspect material.
4. Consult with the general manager and EHS&Q general manager to notify the appropriate regulatory authorities.
5. Cover and secure the material with plastic sheeting or similar to prevent it becoming airborne.
6. Set up an exclusion zone to prevent access by other workers or visitors. Put up signage to clearly identify the find (for example: Asbestos, Arsenic, UXO).
7. Tell people that no unauthorized access is allowed to the immediate area. Only people who have permission from the qualified environmental specialist can enter the barricaded area. Before anyone enters, they should provide a clearance certificate or written approval.
8. Consult an occupational hygienist or specialist for the type of material. They can advise how best to handle and remove it. We communicate this procedure to the people who will undertake the removal or remediation work when we induct them to the site.
9. A qualified environmental specialist will take a sample of the suspect material to test it.
10. If the sample test results show other remedial actions are necessary, we consult with the environmental specialist and our senior site personnel and relevant authorities. We do this to decide how to properly treat, handle and dispose of the material.
11. We obtain all required permits to carry out remedial work before any new work starts. The environmental specialist must provide written clearance before we re-open the area.
12. Remove the barricade to allow work activities to resume under the direction of our project manager.



2.10 LOCK OUT OR TAG OUT ISOLATION PROCEDURE

2.10.1 Plant

If we identify faulty or defective plant and equipment which could impact health and safety or the environment, we:

- isolate it from use
- physically lock it out to prevent unauthorised or accidental use

If plant and equipment is hired, the supplier or hire company is responsible for maintaining it.

If they don't and we find it requires maintenance or repair or could be a risk, we quarantine it. We also attach an Out of Service Tag.

If personnel at a workplace see faulty plant and equipment, they should tell their supervisor. The supervisor will ensure the company complies with its maintenance requirements.

2.10.2 Electrical

The electrician we contract to provide power at our workplaces must ensure their works comply with:

- electrical codes of practice
- Australian standards, such as AS 3000 electrical wiring, AS3012 and AS3010
- any acts and regulations that apply to the state or territory the workplace is in

The electrical contractor we engage must ensure the requirements of our Isolation and Energisation permit are followed. If the contractor has their own robust permit process, the project manager may allow them to follow that for the project. The project manager will document it in the Project Risk Register.

After each temporary board is energised, the electrical contractor must give us a completed copy of a Certificate of Compliance of Electrical Work (or related state or territory document).

Subcontractors must ensure their electrical equipment has been tested and tagged by a competent person. Workers must conduct individual visual checks before any use.

If an electrical device or tool is out of date or not fit for purpose, the item must be tagged out or removed from site until a competent or qualified person fixes it.

We require:

- all Residual Current Devices (RCDs) to be tested monthly
- trip times to be provided to our personnel every month
- all electrical leads to be tested at least once every 3 months

We communicate these requirements at each workplace induction. We also communicate our permit procedures at the induction.



3.0 IMPLEMENT



3.0 IMPLEMENT

3.1 STRUCTURE, RESPONSIBILITY AND ACCOUNTABILITY

We are the principal contractor. We manage and control the project and its environment, health, and safety.

All subcontractors, consultants, suppliers and other contractors or workers must comply with:

- their employer's EHS Management System (or an equivalent system)
- related HR SWMS
- our Project EHS Plan (this plan)
- the site rules
- our Safety Guide
- legislative requirements that apply to the project

These people are accountable for implementing our Management System in each business division :

- EHS&Q manager
- EHS&Q coordinators
- Construction manager

This plan shows how people report to one another for this project, and the key positions that have responsibilities for EHS&Q. The construction manager and project manager prepare this information as a chart (see [Annexure 3](#)).

[Annexure 4](#) shows the EHS&Q responsibilities for this project, and key responsibilities for EHS.

We provide template statements of individual roles and responsibilities on our intranet. Before a person starts work on the project, they must meet with the project manager to review and discuss the statement that applies to their role and responsibilities. If required, they may agree on changes.

Both parties must sign and date the statement. This is a record of their discussion and agreement to the roles and responsibilities.

We file all signed statements electronically, and reference where they are kept in [Annexure 5](#) of this plan.



3.2 EHS training

Our HR advisor and EHS&Q general manager must ensure that an EHS training framework is developed and maintained. This facilitates learning and development across our organisation.

New starters or when a person's responsibilities change

When a person starts a new role or their responsibilities change, we assess their training needs against the employee **Minimum Training Requirements (MTR)**.

We then:

- plan what training they need
- assign appropriate training courses

Corporate will file the training courses on the Employees HR Management System.

Ongoing training reviews

An employee's manager reviews their individual training needs at least once a year as part of the Career Planning Discussion process.

If an employee needs formal training, they can complete a **Training and Development Request form** and give it to their manager for approval. The manager will then send it to corporate who will action it .

After the employee completes the training, their manager must send an updated record to corporate. Corporate will update the employee's profile in the HR Management System.

Training evaluations

An employee who undertakes training must complete a **Training Evaluation form** after they complete it.

This allows them and us to evaluate the training based on how effective or valuable they found it. The evaluation form must be approved by the employee's manager and sent to corporate.

Project-specific training

The Project EHS **Training Planner** identifies the project-specific EHS training needs and skills for our employees at a construction level. For example, confined space entry, environmental awareness, spill management and plant operation.

The project manager approves and maintains the planner, with the EHS&Q manager or coordinator.

The project manager must complete a **Training and Development Request form** to request training at a specific project or workplace.

After the general manager approves the training, we:

- decide if it needs to be internal or external training
- organise the training
- record the date it is completed
- record how long the training is valid for



3.2.1 Training for the EHS Committee and health and safety representative

Where a health and safety representative is elected for a project, they are entitled to attend these courses in work health and safety:

- a. An initial 5 day training course
- b. 1 day refresher training each year (with the first being 1 year after the initial training)

When we are the principal contractor for a major construction project (over \$5m), we establish a health and safety committee for the project. We do this within 2 months of the day work starts on the project.

The committee must include:

- the health and safety representative (if there is one, and they agree to be a member)
- other members that the worker's nominate (50% of the committee members must not be Management)

If there isn't an EHS committee nominated for the project, then a consultative group will be set up involving a site walk with all contractors supervisors after the weekly subcontractors meeting. Any findings on-site will be recored as observations in Procore.

3.3 HOW WE RECORD TRAINING

We keep records of employee training in the workplace. Our corporate team maintain copies in our HR Management System.

The minimum records we keep are:

- course outline or content
- completed attendance records using the Training Attendance Record
- completed Training Evaluation forms
- assessment results (except RTO delivered training where results may not be available)
- associated certificates of completion
- evidence that the trainer is competent in the area they are training in
- evidence that the EHS&Q general manager approved the trainer

We keep these records at a project or workplace via SignOnSite:

- Required qualifications
- Required skills
- Specific industry induction requirements for workers that are not employees (if required)



3.4 HOW WE INDUCT A WORKER

When we induct a subcontractor's employees into a workplace, we take a photocopy of their:

- General Industry OHS Induction/Safety Awareness Training for the Construction Industry Induction Card
- photo identification, such as a driver's licence

If we do not use SignOnSite, we record and list the serial number of the card and licence on our Site Induction Record. If we use SignOnSite, we submit all induction records using the app.

If a person cannot prove they've completed General Industry OHS Induction/Safety Awareness Training, we cannot induct them or let them enter a construction workplace to do construction work.

We develop an induction specifically for a workplace using the Induction Template on our intranet. All workers must do this induction.

All workers must also wear the mandatory personal protective equipment (PPE) that is outlined in the induction and EHS rules for the site or workplace.

People who work in our workplaces must be suitably skilled and trained. If required, they must be certified or licensed to perform their work. This eliminates or minimises risks to health and safety, and the environment.

These are the minimum requirements for subcontractors and other workers at our workplaces:

- General Industry OHS Induction/Safety Awareness Training for the Construction Industry
- Consultation and induction training in specific HR SWMS or related documents that apply to the work they do
- Proof of competence for all operators of mobile plant or equipment before the worker operates that plant (with associated plant risk assessments)
- Induction to the specific workplace via a Site Induction Record or SignOnSite
- Relevant certificates of competency and other work-related training, such as confined space entry, plant operation, or others
- Asbestos Awareness Training (10314NAT or 10675NAT) for all workers in the ACT



3.4.1 Work experience and student placement (WESP)

We support young and inexperienced workers who wish to enter the building and construction industry. But we must follow certain rules to ensure the health and safety of the individual and others in our workplaces.

Before a WESP worker enters a site, we must review and approve all the documents and processes that the worker would follow to complete any task on site. This includes risks we rate as low to medium.

WESP workers are NOT AUTHORISED to conduct high risk activities in our workplaces.

A program provider is an organisation we may work with to facilitate WESP work at a construction site.

Program providers and subcontractors must do all of these:

- Give us copies of their insurance for WESP workers
- Supply all WESP workers with agreed PPE and train them on how to use it correctly, including any associated limitations before they start any work activities
- Induct them into their EHS policies and procedures
- Train them as a minimum in competencies of:
 - General introduction to Construction Industry - White Card
 - Manual handling
 - Ladder usage under 2m working deck
 - Working with hand and powered tools of trade
 - Asbestos Awareness (ACT mandatory requirement)

We must receive written evidence of all of the above competencies before the WESP worker arrives at the site for induction.

These people will attend a 'meet and greet' session with the WESP worker(s):

- Our project manager (chairs the session)
- Our site manager (chair)
- Our EHS&Q manager (chair)
- Program providers or subcontractors
- WESP worker(s)
- Their supervisor(s)

We use this session to explain how a building site works, our expectations, and the expectations of the hosts for the WESP worker. We document the session using a Toolbox Talk form, and write down any questions and answers during the session.

Every WESP worker is to be SUPERVISED AT ALL TIMES. They are not to be placed in a high risk situation, such as using power saws or 225mm grinders, or exposed to potential fall for height.



The WESP must:

- be issued with the correct PPE for the site and the task
- comply with strict PPE requirements for the workplace
- not leave the site unless the project manager and program provider approves it in writing
- participate in the Daily Pre-start and acknowledge the brief via SignOnSite and weekly toolbox talk with the contractor they are working for
- follow our site rules located on the site noticeboards or in prominent location(s)

If they don't, they will be removed from the site.

Our site supervisors regularly monitor work activities to check they are suitable and comply with the processes we approved.

After the WESP worker(s) completes their placement we host a session to discuss the outcomes. Supervisors and host employers attend this session.



3.5 VISITOR INDUCTION

This is our process when 'one-off' visitors (unlikely to return) come to the workplace:

1. The visitor must be reported to our management representative
2. The visitor must sign the Workplace Visitors Register or into SignOnSite, and record their time of entry
3. One of our representatives must accompany the visitor. If we approve it, another person who has been inducted may accompany them (but we must approve it each time)
4. The visitor must sign out and record their time of exit

The following people must hold the General Industry OHS Induction/Safety Awareness Training for the Construction Industry, and comply with all of the above:

- Regular visitors (people who require access twice a month or more)
- People who do construction-related work (activities not specifically defined as construction work)

There must always be a ratio of 1 PBS employee to every 3 visitors. All visitors must wear the mandatory PPE outlined in the induction and EHS rules.

The project manager or site manager for the project will manage the process if prospective buyers, lessees or similar wish to tour or inspect an apartment or building that's under construction.

The project manager will tell the client manager if there are any planned visits or inspections from regulatory authorities or unions.



3.6 HOW WE CONSULT, COMMUNICATE AND REPORT

Our EHS&Q management systems detail our consultation processes. We follow these processes when we consult with others or resolve issues.

We outline agreed consultation arrangements for this workplace in this plan. We also list them on our [EHS Consultation Statement](#) which must be completed and displayed in a prominent location(s) at all of our construction projects.

Our consultation process (and relevant WHS legislation) requires the people who work on a project to consult, share and supply project information with:

- all workers or their representatives
- PCBU (person conducting business or undertaking)
- other subcontractors or service providers with management or control

This is to make sure EHS management issues are appropriately discussed and agreed.

This includes the opportunity for workers to respond and contribute to EHS&Q issues that affect them. They can do this either through:

- the workplace EHS Committee
- the EHS Consultation Group
- health and safety representative(s)
- other agreed arrangements between the employer and workers

3.6.1 Role of the Safety Leadership Team (SLT)

The SLT is one of our many avenues for EHS consultation.

SLT members include a representative from each Designated Work Group, GM, CM, EHS Manager and a PM & SM from the project that is visited. Other senior management representatives may join at any time.

THE SLT has these functions:

- Helps managers and employees implement and review improvements to the way EHS is managed in all business areas.
- Create and maintain an active interest in EHS at workplaces to help reduce:
 1. work injuries
 2. work related illnesses
 3. dangerous occurrences

Assist cooperation

To assist and cooperate managers and employees to implement and review improvements to the way EHS is managed in all business areas.

Create and maintain an active interest in EHS at workplaces to help reduce:

- work injuries
- work related illnesses
- dangerous occurrences



Training and education

Consider training, education and promotional actions to create and strengthen a proactive EHS culture at all of our workplaces.

Review incidents

Review workplace incident reports and/or the [Incident Register on Procore](#) to:

- provide an overview of investigations and corrective actions
- identify any incident trends that may be developing
- seek opportunities to develop a best practice or lessons learned
- distribute lessons learned to all business areas

Safety Leadership Team Meetings

The SLT meets every 2 months, in person or via phone or video conference. Meetings are chaired by the general manager. Minutes of each meeting are recorded and made available for our employees to review on our intranet.

Meeting minutes must consider our EHS performance since the last meeting. This includes the Incident Register and may include a review of system documents and procedures. This meeting includes a forecast of any upcoming HRCW.

In line with legislative requirements, the SLT receives any EHS recommendations made by committees or consultative groups on our projects and will decide what action to take.

3.6.2 Role of the Designated Work Group (DWG) EHS representative

The DWG representative (DWG rep) acts as the line of communication between management and our employees in their business area. This communication is a two-way consultative process.

The DWG rep is in regular contact with workplace employees and keeps them informed of:

- our EHS performance
- changes to workplace arrangements and/or system documents
- other matters that may affect employee health, safety and welfare at the workplace

DWG reps attempt to resolve any EHS disputes between employees, contractors and/or management within a reasonable time frame. The DWG rep must ensure everyone follows the Workplace Issue Resolution flow chart (see [Annexure 9](#)).

The EHS&Q general manager oversees the DWG rep election process. The process must be democratic. We record the elected reps in our DWG Meeting Minutes.

The Election procedure is documented in the PMP .



3.6.3 How we record consultation

The project manager or site manager must prove that workers have been included in discussions on how we consult on EHS in the workplace. This includes employees and service providers, if it applies.

The manager generally shows this via the minutes of an EHS committee or toolbox talk meeting, where they put forward and discuss the EHS Consultation Statement.

Subcontractors and other people who manage or control a business or activity at one of our workplaces must:

- consult with their employees on issues that may impact EHS, such as via a toolbox talk
- record the consultation
- upload copies into their Procore folder or forward them to the project manager or one of our representatives on site

Consultation also means that all employees, subcontractors and other workers must report hazards and incidents.

Our employees must do all of these:

1. Report hazards by completing our [Safety Hazard Notification](#) or an Observation in Procore
2. Report any contact with the community, such as complaints or other contact related to EHS. They can either:
 - Complete our [Community Complain Observation and Register](#)
 - Complete an Observation in Procore
 - Direct the person to any community liaison service
 - Direct the person to follow the client's established complaint process
3. Report all incidents immediately, and notify the construction manager and EHS&Q manager in writing within 24 hours

A person who holds a WHS Entry Permit or equivalent for another state may enter a workplace to:

- consult with relevant workers on WHS matters
- investigate a suspected breach of the WHS Act

The person must follow the requirements of the [Safe Work Australia Right of Entry Legislative Fact Sheet](#), or the Australian Building and Construction Commission (ABCC) On Site app.



3.6.4 How we display EHS information

As a minimum, the EHS coordinator or an appointed representative must display the following information at a prominent location(s) at the workplace including notice board(s):

- All policies referred to in [Section 1.6](#)
- DWG members details and their photos
- EHS committee member information and photos
- EHS Consultation Statement
- EHS committee meeting minutes
- Regulatory notices issued
- PPE requirements
- Site rules
- Site layout with:
 - all emergency assembly points
 - location of firefighting equipment
 - site amenities
 - location of the spill kit
 - signage on how to store hazardous chemicals or dangerous goods at the workplace
- Nearest hospital or medical centre details
- First aid officer(s) photo and contact details
- Any mandatory local authority posters or communications such as those from the ABCC, SafeWork or WorkSafe

This is to ensure all workers can view, discuss, and take note of EHS information.



3.6.5 Toolbox talks, pre-start talks, and other ways we consult

Before we start work each day, all workers must acknowledge the daily brief on [SignOnSite](#).

If we're not using SignOnSite, each subcontractor supervisor must conduct a pre-start session to discuss any:

- EHS matters from the previous day(s)
- activities for the current day
- trade activities that interface with us or other trades
- changes to emergency access and the control measures

The pre-start meeting can be recorded using our Daily Pre-start template or a similar document that the subcontractor uses.

Each subcontractor supervisor must tell our site manager or equivalent manager what works they will do tomorrow. This ensures the SignOnSite brief is current for all trades who will attend the site that day.

We conduct toolbox talks with our site construction workers every week. Our subcontractors must do the same. This keeps employees and other workers up to date on conditions and changes to the workplace that may affect EHS.

We record other formal EHS-related meetings in our EHS Committee Meeting Minutes form. We may use the form when we discuss:

- this plan
- SWMS for high risk construction work or a specific work task that's equal to high risk
- other relevant EHS matters

3.6.6 EHS records and reporting

The project team records and reports all EHS matters to the construction manager and EHS&Q general manager in line with [Annexure 10](#).

The managers collate all reports and records to produce EHS statistics. These stats help the business:

- identify trends in EHS performance
- track progress against the yearly objectives and targets shown in [Section 2.6](#)
- identify impacts, hazards and incidents across all projects and implement corrective action

The project manager or appointed representative must follow the requirements in this plan to monitor, record, report, and retain information for all of the following:

Special conditions

Document any special conditions and requirements that apply to the project in [Annexure 8](#).

Inspections and monitoring

Inspect and monitor these daily, weekly and monthly for the project:

- EHS matters
- Compliance with legislation
- Compliance with our [Safety Guide](#) and site rules



Incidents and observations

Report incidents and complete the relevant investigation reports.

Record all EHS incidents and positive and negative Observations in Procore or hard copy. If in hard copy, scan and email them to the relevant manager.

Track the incident or observation to completion if it relates to a notifiable incident because of a failure to comply with:

- legislation
- site EHS rules
- system requirements
- our [Safety Guide](#)

A notifiable incident may be a critical incident or work-related injury that results in lost time or medical treatment.

Corrective actions

Take appropriate corrective action in a reasonable time frame to eliminate the cause of an incident or observation, and prevent it from happening again.

Use the Hierarchy of Control principles in the [Project Risk Register](#) to decide the most effective control measure(s).

Monitoring corrective actions

Monitor how effective a corrective and preventive action is for up to 30 days after an incident or observation happens.

Close out any Incident Report and Incident Investigation for a notifiable incident.

Using Injury Grab N Go Packs

Use an [Injury Grab N Go Pack](#), which includes a letter to the doctor with suggestions for alternate suitable work duties, and reference to the resources we have to manage injuries.

Making sure EHS audits are completed

Facilitate the completion of EHS audits for the project using the [EHS Internal Audit Report](#).

Close out any findings.

Notifying the relevant manager of impending audits

Tell the EHS&Q manager or general manager if the workplace will be audited by a second party (such as the client).

This allows staff at a divisional or national level to attend, and manage any corrective and preventive actions.



Maintaining the correct registers

we maintain several registers as required, these are;

- SDS Register using chemwatch or hard copy register onsite where applicable.
- electrical registers
- equipment registers on Procore
- training registers, and;
- incident register on Procore

Ensuring proper access to first aid facilities

Ensure a current safety data sheet or access to ChemWatch is available to first aid and workers who will use the product.

Reviewing products

Review products classified as hazardous by the safety data sheet. Use ChemWatch to review and determine if a non-hazardous (preferred) or less hazardous alternative is available for use.

Conducting formal meetings

Conduct and document formal site meetings and reviews to discuss project EHS management and performance.

For example, project team meetings, subcontractor meetings, EHS Committee or DWG meetings.

Collecting and collating EHS statistics

Collect and collate project team and subcontractor EHS stats and performance results for the month.

For example, incident reports, first aid treatment injuries, medical treatment injuries, lost time injuries, or incident reports.

Presenting data

Present consolidated monthly data at project reviews to senior management.

Following client reporting requirements

Insert any client reporting requirements here:

Using appropriate tools for non-critical incidents

For non-critical incidents, use the necessary tools and reporting lines detailed in this plan.



3.6.7 How we report workplace incidents

If an incident or injury occurs that is more severe than we can treat on site, the project or site manager or EHS representative must report it directly to the EHS&Q manager and construction manager.

We wait for the general manager and EHS&Q general manager to provide direction before we report any incidents to regulatory authorities or the client, unless there is a fatality. In this case, project team members must notify authorities immediately.

We record any community or EHS-related complaints as an 'Observation' under 'Community Complaint' in Procore. We also direct the person to any community liaison service, or ask them to follow the client's complaint process for the project.

The project manager must be told about any community complaints. If the issue cannot be resolved locally, the project manager will tell the construction manager and general manager.

If all attempts to resolve the issue fail, our managing director will consult with our board of directors who may involve external parties (such as authorities) in the issue resolution process.

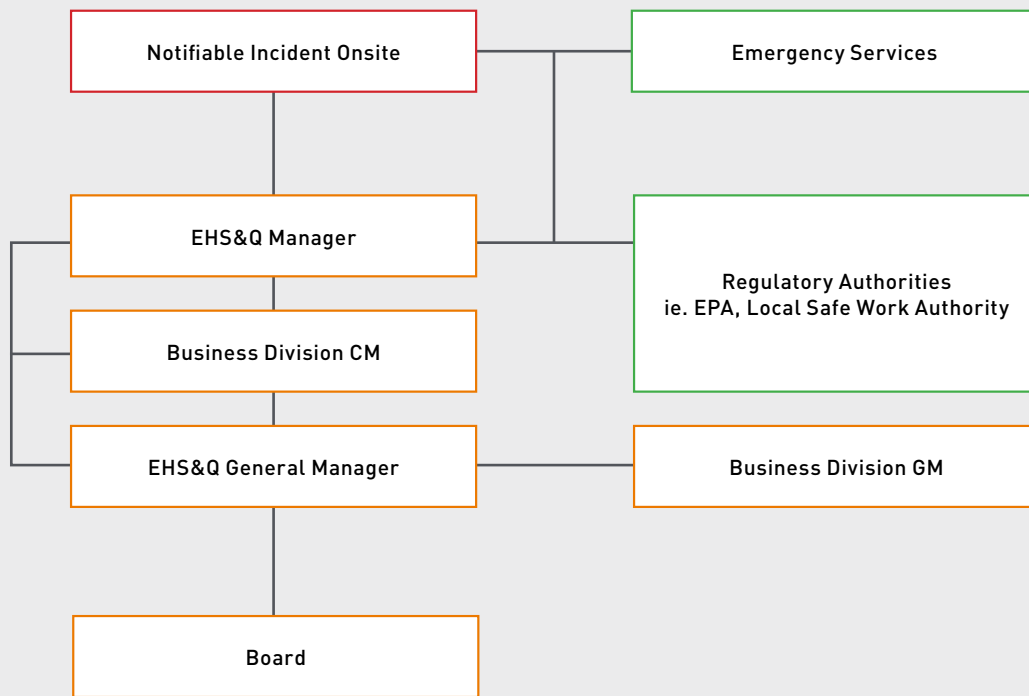


Diagram 2 - Notifiable incident reporting flow chart



3.6.8 Senior management team reporting

The senior management team comprises:

- general managers
- chief operating officer
- chief financial officer
- managing director

If there's a critical incident, the EHS&Q general manager reports directly to the chief operating officer and managing director.

The senior management team will:

- attend the workplace to assist our staff
- assist with and attend to any demands from regulators
- manage any necessary media reporting
- attend to any court orders or notifications from authorities
- oversee the investigation to ensure all relevant documents are gathered
- oversee any counselling program at the workplace because of the incident
- ensure any critical incident reports are complete through monthly board meetings
- assess if the critical incident was managed effectively with the staff who were involved and attend to any gaps in processes or training

We follow the process in [Table 1](#) to report an incident or similar event, and take corrective and preventative actions.

Occurrence / Incident / Report	Originator	Action	Close-out Responsibility
All incidents of injury more than first aid, near miss, environment harm or potential harm, plant or property damage	Project team members	Report immediately to the EHS&Q manager and project manager or nominated representative. Note: We only notify regulators after we receive advice from the EHS&Q general manager or general manager.	Project manager EHS&Q manager
EHS events / EHS incident reports	Project manager / Site Manager / EHS&Q coordinator / EHS&Q manager	We enter all incidents into Procure or record them in a PBS Incident Report and Investigation form.	Project manager / Site manager / EHS&Q manager
EHS observations	Project team members	All positive/negative observations entered in Procure using the 'Observation' tool.	Project manager / EHS&Q coordinator / EHS&Q manager / Site manager / Foreman



Occurrence / Incident / Report	Originator	Action	Close-out Responsibility
Identified actual incidents	Site manager / EHS&Q coordinator	We enter all actual incidents involving a subcontractor into Procure or our intranet using an Incident Report and Investigation form. Close out must contain corrective and preventative actions.	Construction manager / Project manager / EHS&Q coordinator / EHS&Q manager / Site manager / Foreman
First aid injury	Site manager / First aider / EHS&Q coordinator	First aid personnel must complete a Register of Injuries, enter it into Procure, and report it to the EHS manager.	First aider / EHS coordinator / EHS&Q manager
Medical treatment injury – an injury where the person is treated by a medical practitioner but returns to work without losing a shift of work	Site manager / First aider / EHS&Q coordinator	The first aider or site manager must report it immediately in Procure and notify the EHS&Q manager and construction manager by phone or email.	Construction manager / EHS&Q manager
Lost time injury (LTI) – an injury where a person loses a whole shift due to a work-related injury or illness	Site manager / First aider / EHS&Q coordinator	The first aider or site manager must report it immediately in Procure and notify the EHS&Q manager and construction manager by phone or email. Email sent to the EHS&Q general manager (for suspected LTI) to complete OFSC incident report within 48 hours.	EHS&Q general manager EHS manager / Site manager /
Workers compensation / Rehabilitation	Site manager	Site manager to complete an Injury Notification form within 24 hours. Rehabilitation Monitoring form (Return to Work) and workers compensation forms as required by our Return to Work coordinator.	OFSC report - to be submitted by EHS&Q general manager
Notices and infringements served from a government authority	Authority	Project or site manager must report immediately in Procure and notify the EHS&Q general manager and general manager via phone or email. It must also be included in monthly reporting.	General manager / Construction manager / EHS&Q general manager

Table 4 – Incident reporting requirements



3.7 EMERGENCY RESPONSE AND EVACUATION

All of our workplaces must develop and implement an **Emergency Management Sub Plan** specific to the workplace.

The project manager or site manager must ensure this is done. This includes appointing a competent person as defined by AS3745 Planning for Emergencies in Facilities (PUAWER005B - Operate as part of an emergency control organisation PUAWER008B - Confine small workplace emergencies).

The competent person must assess the suitability, location and accessibility of emergency equipment in the ERP.

We use **SignOnSite** to identify which workers are on site at any time.

If we cannot use SignOnSite, we use records from each subcontractor's daily pre-start session. The session must record each employee's name and their signature. This must be given to our site office no later than 7:30am each day or before the start of each shift.

Any late workers or staggered start workers must report to our site office before their shift. They must sign into the daily pre-start for their specific employer before they start work.

We follow the incident reporting flow chart in **Diagram 2** (under **3.6.7** above) to report emergency situations in our workplaces.

3.8 PERMIT PROCEDURE

The Permit to Work system controls:

- specific high risk construction work activities defined by relevant legislation
- other activities that we rate as high risk

We have a collection of permits (listed below) that we use on all projects. These allow us to implement controls to reduce the risk of harm to workers and the environment.

We must follow the requirements of every permit.

The permit holder must fill out the relevant permit and have it approved by the foreman or site manager who controls the area where the high-risk work will be done. Then work can start, and our supervisor will monitor any control measures and conduct any inspections that the permit requires.

We use these permits on a project:

- **Concrete Coring Work Permit**
- **225mm Grinder Work Permit**
- **Confined Space Permit**
- **Enter Restricted Areas Work Permit**
- **Excavation Works Permit**
- **Harness Work Permit**
- **Hot Work Permit**
- **Isolation Energisation Work Permit**
- **Swing Stage Work Permit**



3.8.1 General requirements for a Permit to Work

The permit holder must complete the relevant Permit to Work, and consult with our staff who are responsible for the works.

Any associated documents and plans should be attached to the Permit to Work so they can be used when communicating the requirements of the permit.

Before work starts, any HR SWMS associated with the work the permit relates to must be signed by all workers who are involved in the work. This verifies that they've been trained and consulted in how the work method was developed.

If conditions or the scope of work changes then supervisors, employees and other workers must stop work.

We file permits electronically in a central location for each project. If we're not using Procore, we use the [Permit Register template](#) and save it in the project file on the intranet.

These groups review the Permit to Work process during regular meetings:

- EHS Committee
- Designated Work Group (DWG)
- Consultation group

This includes how effective the process is, the maximum time we need a permit, and any incidents that relate to works involving a Permit to Work.

We cannot use permits for more than 1 day (or 1 shift) unless our site manager authorises it and documents it in the [Project Risk Register](#).

If we need a permit for longer and the conditions or environment stated in the permit won't change, we can use the permit for a maximum of 7 days if we follow these rules:

- Permits for hot works cannot be used for more than 1 day
- The site manager must:
 - assess the time extension
 - authorise the extension in writing
 - add it to the [Project Risk Register](#)
 - validate the permit every day to confirm conditions haven't changed and the permit is still valid (they can use the site diary or the permit for this)
- Supervisors must conduct a daily refresher or toolbox/pre-start talk to reinforce the [HR SWMS](#) and the requirements of the permit before work starts

If we need the permit for works that may go on for weeks or months, we must document it in the Project Risk Register as soon as we become aware of the need.

The permit is only ever valid for 7 days. If we extend it beyond the 7 days, we must follow these rules every time.

If new workers start at the site, they must be inducted into the requirements of the permit before they start work.



3.8.2 Before work starts

The person who requests the permit is the permit holder. This may be a subcontractor's supervisor or an appointed person.

The permit holder completes the permit. They must inspect the work area(s) to ensure all conditions listed on the permit are, or can be, implemented and it's safe to start work.

The person(s) who will do the work must sign both of these to prove they've been consulted:

- The permit
- Any associated [HR SWMS](#), if it applies

When they sign the permit, they also confirm that:

- they have taken any precautionary controls
- they will carry out the work in line with the permit conditions and any [HR SWMS](#) that apply

Our supervisor will then authorise the permit to the person(s) responsible for the work. The supervisor must ensure every question in the 'mandatory' section is completed, or they cannot issue the permit.

3.8.3 During the work

Our supervisor who issued the permit must monitor these at least 1 time during the shift:

- The work area
- Compliance with the controls listed in the permit and [HR SWMS](#)

They can record this in the site diary or site manager diary notes.

The permit holder must also monitor the works at least 1 time during the shift, to ensure they comply with the controls.

3.8.4 When the work is complete

The permit holder must sign the permit to verify that the works are complete and the area has been left in a safe condition.

Our supervisor must confirm:

- all controls have been restored
- housekeeping is acceptable
- the area is safe

The permit is then signed and closed. This means it's no longer valid.

We save it and keep it in the project file on the intranet, or in Procore.

3.8.5 Why we may suspend works

We may suspend works if the:

- conditions of the permit are not met
- scope of works changes, perhaps due to the weather, program, or work itself

If we see any non-compliance, we must record it as a negative 'Observation' in Procore.



3.9 HOW WE MANAGE SUBCONTRACTOR EHS

Subcontractors or other workers that will carry out high risk construction work must provide a [HR SWMS](#) for the work before they start.

Subcontractors must tell the project manager or appointed representative immediately if a regulator or union attends the site for their operations or activities.

They must also comply with our incident reporting requirements which are detailed in the site-specific EHS rules and induction.

3.9.1 High Risk Safe Work Method Statements (HR SWMS) and EHS Plans

When we develop a HR SWMS for high risk construction work by our employees, we use the [High Risk Safe Work Method Statement template](#).

The foreman or supervisor who controls the works completes it. They must consult with the employees who will do the work. The EHS&Q coordinator or manager for the project will do a final review of the HR SWMS.

The HR SWMS must include:

- any construction-related health and safety hazards and risks
- environmental aspects and impacts
- related control measures in the [Project Risk Register](#)
- related control measures in our [Safety Guide](#)

Collaboratively these people will review the subcontractor WHS Plan (Where Required) and related HR SWMS::

- Project manager
- Site manager
- EHS&Q representative

They must use our Subcontractor [Subcontractor EHS&Q Plan Review Checklist](#) and [HR SWMS Review checklist](#).

All subcontractors must consult with and train their employees or other workers on any HR SWMS that relate to their work activities. The employees and workers must then sign the relevant HR SWMS to show they have been consulted and trained.

Subcontractor supervisors must also sign all HR SWMS that apply to any workers under their control. This ensures they are aware of the safe work methods for all activities they are responsible for.

Subcontractors must verify that any person who will operate mobile plant or equipment is competent, before the person can operate it.



3.9.2 How we identify, control and monitor impacts and hazards

We encourage every worker to identify and control health and safety hazards and risks, and environmental aspects and impacts. They should only do this if it is safe, and they must report the issue immediately to their supervisor or one of our staff.

We encourage this via:

- workplace inductions
- toolbox or pre-start talks
- forums

Our project teams conduct weekly observations of high risk construction work activities against [HR SWMS](#). This is to verify that control measures have been implemented, and to identify safe behaviours.

We record these as a positive or negative 'Observation' in Procore. If it's EHS-related, we record it as a diary entry in the site manager's or foreman's site diary.

[Section 4.2](#) outlines other EHS-related monitoring conducted by our staff or a subcontractor supervisor.

We will stop work in an area if we identify ineffective or inadequate control measures for high risk impacts or hazards. Key stakeholders (including relevant workers) must then consult as shown in [Annexure 6](#) to achieve the required control measures.

We document potential situations where we may need to monitor health in the [Project Risk Register](#). More information about this is also in the [Management System Manual](#) (Exposure Monitoring and Health Surveillance procedure).



3.10 HOW WE MANAGE EHS&Q RECORDS

We file EHS records at a workplace level in line with statutory requirements.

Every form, checklist or template we reference or provide in Procore and on our intranet is also mandatory. Wherever they apply to a workplace or impact or hazard, we must use them.

During the project and after it, we must scan every document and keep it on our intranet in a specific folder named for the project. We follow the [Project Archiving Checklist](#) when we want to archive a document.

Our EHS&Q manager will make Australian Standards available to any person on site, including subcontractors, at any time.

The local [WorkSafe](#) and [SafeWork](#) websites contain all legislation and codes of practice. We also keep a library of standards and codes on our intranet. The EHS&Q general manager reviews these at regular intervals.



4.0
IMPROVE



4.0 IMPROVE

4.1 HOW WE MONITOR PLANT, GOODS, EQUIPMENT AND PROCESSES

We assess the compliance of plant, equipment and processes at this workplace as per the schedule in [Annexure 7](#).

We check incoming plant and equipment using 1 or more of these checklists:

- Plant and Equipment Inspection Checklist appropriate for the item using the Equipment tool in Procore.
- [Lifting Gear Inspection checklist](#)

We maintain records on Procore using the Equipment tool.

Mobile Equipment Acceptance Tag (MEAT) procedure

We use the Mobile Equipment Acceptance Tag (MEAT) procedure for all incoming plant and equipment covered by that procedure. The procedure provides a visual indication (picture with notes) that the items have been reviewed and are ready for use on site.

Contractors can find the [MEAT checklist](#) for specific plant and equipment in Procore. Or, we can provide a copy at the site office.

The contractor must then verify that all:

- components listed work properly
- plant operators have read and understood the Operation and Maintenance Manual

Plant operators must also comment on any other particulars about the plant or equipment on the [MEAT checklist](#). This could include comments such as “Running out of tread on tires”, “Reverse alarm working intermittently”, and so on.

In addition to the completed checklist, the subcontractor must meet all the mandatory requirements and give us specific documents such as these:

- Plant Risk Assessments
- Design Registration
- Original Equipment Manufacturers manual

Our representative will review all the documents to:

- ensure any outcomes from the risk assessment have been addressed with the plant operator
- check the accuracy of the checklist

then

- conduct a visual check of the plant or equipment
- complete and sign the checklist
- place a MEAT sticker on the item

Project teams and members of the EHS Committee (where applicable) check the MEAT stickers each week. As a minimum, they review each MEAT every month and document the review on the MEAT sticker.



Purchased plant and equipment

The EHS manager will verify that any incoming purchased goods (plant or equipment) meet required WHS legislative specifications before they are installed or used.

If they don't, they record it in Procore or in a [Positive Observation Form](#) or [Negative Observation Form](#) and we return the goods to the supplier. Or, if they stay on site waiting to be fixed, the manager will quarantine them and they will be Tagged Out as per the procedure in [section 2.9](#).

Calibration

We follow the manufacturer's specifications to calibrate EHS measuring and testing equipment. We do this to ensure it works properly, and can accurately verify that levels comply with company, client and legislative requirements.

Inspection and required documentation of plant before it is used

A competent person, such as a plant owner, mechanic or engineer will inspect all powered plant and equipment before we use it. They must follow the manufacturer's specifications.

The operator must also perform a pre-start check every day. They must record this in the pre-start record booklet provided by the owner or manufacturer of the plant item.

Sometimes, a qualified person will need to inspect and certify plant and equipment where the configuration can be altered (such as cranes and hoists).

Only appropriately trained and experienced people can operate plant and equipment. Where required, they must hold a certificate of competency.

Subcontractors must maintain inspection and test records, and a Plant Register(s), for their plant and equipment.

We must maintain inspection and test records, and a [Project Plant Register](#)(s), in Procore.

The supplier or hire company is responsible for maintaining their plant and equipment. If they don't and we find it requires maintenance or repair or could be a risk, we quarantine it. We also attach an Out of Service Tag.

If personnel at a workplace see faulty plant and equipment, they should tell their supervisor. The supervisor will ensure the company complies with its maintenance requirements.

When plant and equipment is supplied to a workplace, we also require these:

- A register of the plant and equipment
- A risk assessment for the plant or equipment
- Evidence of adequate instruction and training in the use of the plant and equipment including a High-Risk Work Licence or verification of competency (where required) for high risk plant
- A HR SWMS or equivalent related to the safe operation of the plant and equipment, where its operations are classified as high-risk construction work, such as use of a boom lift
- Records detailing the currency of ongoing maintenance, testing or calibration
- Design and plant regulatory registrations

Depending on the plant and equipment, we may require other information.

If we find faulty or defective plant and equipment which could impact health and safety, or the environment, we remove it from service and follow the Lock Out / Tag Out Isolation Procedure in [Section 2.9](#).



4.2 HOW WE MONITOR THE WORKPLACE

We monitor workplaces to review EHS&Q performance against:

- our Management System
- legislative requirements
- Australian standards

Monitoring also helps us identify opportunities to improve.

We forward any EHS&Q performance outcomes, and progress against objectives and targets raised in project review meetings, to the EHS&Q general manager.

Reports and related information helps senior management:

- identify trends in EHS&Q performance
- track progress against annual objectives and targets
- identify opportunities to improve

We prepare workplace inspections for each workplace as per the schedule in [Table 5](#).

The schedule specifies:

- what we need to measure
- how we measure it
- who measures it
- when we measure it
- how we record what we measure

This includes all plant and equipment we use (including hired equipment).

Any worker can complete a [Safety Hazard Notification](#) to report WHS hazards and risks or environment aspects and impacts in the workplace.

We list other formal monitoring inspections in [Table 5](#).

If a negative observation is issued to a worker (employee or subcontractor), we keep it in the project folder on our intranet and track it through Procore.

We also track the cause and any corrective or preventative actions, and manage them in line with [Section 4.3](#) (below).



We inspect the project workplace as follows:

Project inspection agenda				
Task	Type of inspection	Inspection by	Frequency	Record
Specific work area	Hazard inspection	All area foreman / Supervisors / Site manager	Daily	Diary entry of any significant issues, Hazard Notification form or 'Observation'
All general work areas including plant and equipment	Weekly EHS inspection	EHS&Q coordinator or designated EHS&Q manager, and the EHS Committee	Weekly	Weekly EHS inspection checklist, EHS Committee minutes
All general work areas including plant and equipment	EHS inspection	Site manager	Minimum monthly	EHS Site Assessment checklist
EHS monitoring	EHS monitoring identified by the Project Risk Register	Competent person	As required	Completed PBS forms or equivalent: Noise Monitoring Register, monitoring outlined in EHS sub-plans
Calibration of EHS monitoring equipment	Manufacturer's calibration	Competent person	As required	Calibration certificate
High risk construction work and Permit to Work	Task observation	Permit issuer and holder	Daily	PBS Permits and Permit Procedure
Subcontractor work activities	Work activity EHS inspection	Subcontractor supervisor	Daily	Subcontractor Supervisors Diary Entry of any significant issues, or completed Subcontractor's EHS Inspection checklist
Contracted works by subcontractors or employees	EHS Plan and SWMS application review	Project manager/ Nominated representative / Site manager / EHS&Q coordinator or manager	Within 8 weeks of commencement and thereafter: minimum 10% sample audit of high-risk work at max quarterly intervals	Completed PBS Subcontractor Audit Review, completed PBS Subcontractor Audit Review Schedule
Project internal audit	EHS Management System implementation	EHS&Q manager	Within 8 weeks of commencement and thereafter: minimum 10% sample audit of high-risk activities at max quarterly intervals	Completed EHS Internal Audit Report and Internal Audit Action Plan. Completed Project EHS&Q Audit Schedule

Table 5 – Workplace inspection schedule



4.3 NEGATIVE OBSERVATIONS AND ACTIONS TO CORRECT OR PREVENT THEM

We use Procore to record negative 'Observations', and corrective or preventative actions.

The project team must track them from start to finish.

They must:

1. Identify the cause of the negative observation or incident
2. Record the corrective action and preventative action
3. Evaluate how effective the action(s) was

This includes EHS action items from:

- reviews
- audits
- workplace inspections or assessments
- hazard notification reports

We correct action items within a reasonable time to prevent them happening again.

The EHS&Q manager can decide the time frame to rectify a negative observation that was raised in any inspection or audit. But it must not be more than 1 month.

If a negative observation is not resolved within 1 month, it will be elevated to our EHS&Q general manager to resolve.

4.3.1 Injury management and Return to Work

We report immediately to the EHS&Q manager if any employee or worker is injured:

- at a workplace we manage, or
- in their normal journey to and from work

and

- the injury will result in time off, or
- the person cannot complete their normal duties

If this happens, we follow our [Return to Work policy](#) and procedure.

We clearly display our Return to Work policy in every workplace and in the Management System Manual.



4.3.2 Unacceptable behaviour

We manage unacceptable EHS performance in line with the EHS rules for the workplace. This includes employees and subcontractors.

If a subcontractor does not follow the rules, they can expect:

- verbal notice(s) from our management
- a negative Observation(s) in Procore which they must correct

If it continues, they can expect:

- more negative Observations in Procore which they must correct
- a Formal Correction Notice form (for major breaches)

If an individual behaves in a way that would result in serious injury to them, others, or the environment, we stop work. We then elevate the incident to the immediate supervisor and other relevant stakeholders.

4.3.3 Counselling and help for employees

If you need to talk to someone, or want to get information for a friend, ask Oz Help.

Oz Help is our Employee Assistance Provider. They can give you confidential support about any work or personal issue.

You can talk to them about:

- anxiety, stress and depression
- suicidal thoughts
- relationship challenges
- grief and loss
- family matters
- work/life balance
- work-related matters
- alcohol, drug or gambling

They are available 24/7.

Contact them via:

Phone: [1300 694 357](tel:1300694357) or [\[02\] 6251 4166](tel:0262514166)

Website: <https://ozhelp.org.au/>



ANNEXURES



A1. SUB-PLANS

We identify sub-plans in the Project Risk Register as per [Section 2.1.1](#).

The project manager or a nominated person must implement and maintain the sub-plan(s) and their requirements.

Sub-Plan Name	Required	Reason
Asbestos and Hazardous Materials Management Plan		
Crane Management Plan		
Emergency Response Plan	Yes	Mandatory with any EHS Plan
Environmental Management Sub Plan		
Fit for Work and Drug and Alcohol Testing Plan	Yes	Mandatory with any EHS Plan
Hazardous Chemicals and Dangerous Goods Management Plan		
NFTMS Sub Plan		
Noise Management Sub Plan		
Quality Management Sub Plan	Yes	Mandatory with this Project EHS Plan
Stakeholder Communications Plan		
Traffic & Parking Management Plan		
Waste Management Plan		



A2. ENVIRONMENT AND WHS LEGISLATIONS

The construction works must be conducted in accordance with all commonwealth, state or territory legislation that applies to the location where the work is being done.

The list below is for general reference if you need clarity on specific issues. Otherwise, contact the EHS&Q general manager.

State / Territory	Principal Legislation	Authority
Commonwealth	<ul style="list-style-type: none">• Work Health and Safety Act• Work Health and Safety Regulations• EPBC Act	Safe Work Australia, Comcare, Federal Safety Commissioner. Department of the Environment
Australian Capital Territory (ACT)	LEGISLATION <ul style="list-style-type: none">• Building (General) Regulation• Building Act• Dangerous Goods (Road Transport) Regulation• Dangerous Substances (General) Regulation• Dangerous Substances Act• Discrimination Act• Discrimination Regulation• Electricity Safety Act• Electricity Safety Regulation• Environment Protection Act• Environment Protection Regulation• Gas Safety Act• Gas Safety Regulation• Information Privacy Act• Information Privacy Regulation• Road Transport (Safety and Traffic Management) Regulation• Scaffolding and Lifts Act• Scaffolding and Lifts Regulation• Water and Sewerage Act• Water and Sewerage Regulation• Water Resources Act• Work Health and Safety Act• Work Health and Safety Regulation• Workers Compensation Act• Workers Compensation Regulation	WorkSafe ACT, Work Safety Commissioner Environment ACT



State / Territory	Principal Legislation	Authority
Australian Capital Territory (ACT)	<p>CODES OF PRACTICE</p> <ul style="list-style-type: none"> • Confined Spaces • Construction Work • Demolition Work • Excavation Work • First Aid in the Workplace • Formwork • Hazardous Manual Tasks • How to Manage and Control Asbestos in the Workplace • How to Manage Work Health and Safety Risks • How to Safely Remove Asbestos • Managing Electrical Risks at the Workplace • Managing Noise and Preventing Hearing Loss at Work • Managing Risks of Plant in the Workplace • Managing the Risk of Falls at Workplaces • Managing the Work Environment and Facilities • Preventing and Responding to Bullying • Preventing Falls in Housing Construction • Safe Design of Structures • Welding Process • Work Health and Safety Consultation, Cooperation and Coordination 	WorkSafe ACT, Work Safety Commissioner Environment ACT
New South Wales (NSW)	<p>LEGISLATION</p> <ul style="list-style-type: none"> • Work Health and Safety Act • Work Health and Safe Regulation • Protection of the Environment Operations Act • Environmental Planning and Assessment Act • Protection of the Environment Operations (Clean Air) Regulation • Protection of the Environment Operations (Noise Control) Regulation • Water Management Act 2000 Water Act 1912 Water Management (General) Regulation • Protection of the Environment Operations (Waste) Regulation • Workplace Injury Management and Workers Compensation Act No 86 • Dangerous Goods (Road and Rail Transport) Regulation • Environmental Planning and Assessment Act No 203 • Environmental Planning and Assessment Regulation • Gas Supply Act No 38 • Gas Supply (Safety and Network Management) Regulation • Heavy Vehicle National Law (NSW) No 42a • Heavy Vehicle (Vehicle Standards) National Regulation (NSW) • Heritage Act No 136 • National Electricity (NSW) Law No 20a • Plumbing and Drainage Act No 59 	SafeWork NSW Environment Protection Authority NSW Office of Water



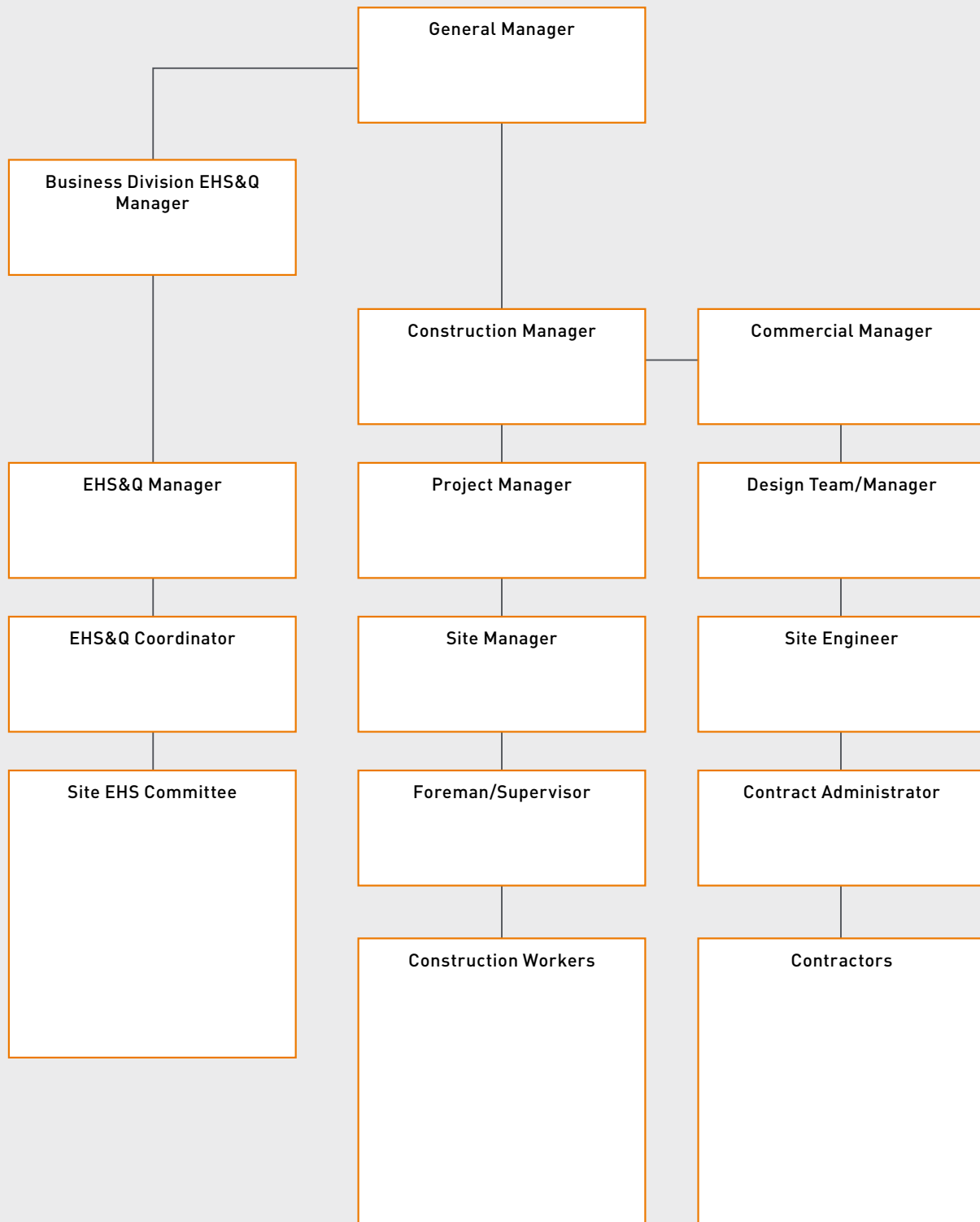
State / Territory	Principal Legislation	Authority
New South Wales (NSW)	<p>CODES OF PRACTICE</p> <ul style="list-style-type: none"> • Abrasive blasting July • Confined spaces December • Construction work July • Demolition work September • Excavation work July • First aid in the workplace July • Hazardous manual tasks September • How to manage and control asbestos in the workplace September • How to manage work health and safety risks December • How to safely remove asbestos September • Labelling of workplace hazardous chemicals April • Managing electrical risks September • Managing noise and preventing hearing loss at work April • Managing the risk of falls at workplaces April • Managing risks of hazardous chemicals in the workplace July • Managing the risks of plant in the workplace July • Managing the work environment and facilities December • Preparation of safety data sheets for hazardous chemicals December • Preventing falls in housing construction July • Safe design of structures July • Welding processes September • Work health and safety consultation, cooperation and coordination December 	<p>SafeWork NSW</p> <p>Environment Protection Authority</p> <p>NSW Office of Water</p>
Queensland (QLD)	<p>LEGISLATION</p> <ul style="list-style-type: none"> • Work Health and Safety Act • Work Health and Safety Regulation • Workers' Compensation and Rehabilitation Regulation • Environmental Protection Act • Environmental Protection Regulation • Water Act • Building Queensland Act • Electricity Act • Electrical Safety Regulation • Health and Wellbeing Queensland Act • Heavy Vehicle National Law Act • Plumbing and Drainage Regulation • Queensland Heritage Regulation 	



State / Territory	Principal Legislation	Authority
Queensland (QLD)	<p>CODES OF PRACTICE</p> <ul style="list-style-type: none"> • Abrasive blasting Code of Practice • Concrete pumping Code of Practice • Confined spaces Code of Practice • Demolition work Code of Practice • Electrical safety Code of Practice • Electrical safety Code of Practice - Working near overhead and underground electric lines • Electrical safety Code of Practice - Works • Electrical safety Code of Practice - Managing electrical risks in the workplace • Excavation work Code of Practice • First aid in the workplace Code of Practice • Formwork Code of Practice • Hazardous manual tasks Code of Practice • How to manage and control asbestos in the workplace Code of Practice • How to manage work health and safety risks Code of Practice • How to safely remove asbestos Code of Practice • Labelling of workplace hazardous chemicals Code of Practice • Managing noise and preventing hearing loss at work Code of Practice • Managing risks of hazardous chemicals in the workplace Code of Practice • Managing risks of plant in the workplace Code of Practice • Managing the risk of falls at workplaces Code of Practice • Managing the work environment and facilities Code of Practice • Manual tasks involving the handling of people Code of Practice • Mobile crane Code of Practice • Preparation of safety data sheets for hazardous chemicals Code of Practice • Safe design of structures Code of Practice • Scaffolding Code of Practice • Steel construction Code of Practice • Tilt-up and pre-cast construction Code of Practice • Tower crane Code of Practice • Traffic management for construction or maintenance work Code of Practice • Welding processes Code of Practice • Work health and safety consultation, co-operation and co-ordination Code of Practice 	
Additional National Codes of Practice applicable to all States and Territories	<ul style="list-style-type: none"> • Abrasive blasting • Labelling of Workplace Hazardous Chemicals • Preparation of Safety Data Sheets for Hazardous Chemicals • Spray Painting and Powder Coating 	



A3. PROJECT ORGANISATIONAL CHART





A4. EHS RESPONSIBILITY MATRIX

R = Responsible A = Accountable C = Consulted

	EHS&Q GM	Regional EHS&Q Manager	EHS&Q Manager	Human Resources	Project EHS&Q Co-ordinator	Construction Manager	Project Manager	Contracts Administrator	Site Manager	Foreman	Site Engineer	Subcontract Supervisor	EHS Committee	Construction Worker	First Aid
EHS&Q Corporate Plan and EHS&Q Procedures															
EHS Policy															
Project EHS Management Plan															
ROAD Review															
Project Risk register															
EHS Sub-Plans															
Legislation & Regulatory Changes															
EHS Site Rules															
PBS EHS Objectives & Targets															
Project EHS Audit															
EHS Roles & Responsibilities															
EHS Training Matrix															
EHS Training Planner															
Subcontractor EHS Plan															
PBS Safe Work Method statements															
Subcontractor Safe Work Method Statements															
Worker Induction															
Visitor induction															
EHS Consultation															



	EHS&Q GM	Regional EHS&Q Manager	EHS&Q Manager	Human Resources	Project EHS&Q Co-ordinator	Construction Manager	Project Manager	Contracts Administrator	Site Manager	Foreman	Site Engineer	Subcontract Supervisor	EHS Committee	Construction Worker	First Aid
EHS Reporting															
Emergency Management															
Haz Substances & SDS															
Plant & Equipment															
Permits to Work															
Subcontractor EHS Reporting															
EHS Weekly inspection															
EHS Committee weekly inspection															
Subcontractor audit															
Non-conformance and defects															
Incident notification, investigation & reporting															
Site Diary															
Toolbox Talks															
Daily Pre-starts															
Display EHS information															
EHS Monitoring / calibration															
Injury Management															
EH&Q System Audits															



A5. ROLES AND RESPONSIBILITIES STATEMENTS

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A6. CONSULTATIVE ARRANGEMENTS

Event	Frequency	Participants	Evidenced
Workplace induction	Prior to commencing work at the workplace	All workplace employees and other workers. Visitors frequenting the workplace more than twice a month.	Induction records on Workplace Induction Register via SignOnSite
Pre-start	Daily intervals, including any communications from PBS about: <ul style="list-style-type: none"> • site activities • HRCW activities and interfacing work activities for the day • changes to emergency exits from site or work areas • weather • other relevant information and when there is a new or changes to, or out of sequence, work tasks classified as high risk construction work	PBS construction workers, plus subcontractors and other workers, including subcontractor foremen and supervisors	Daily pre-start or Daily brief via SignOnSite
Subcontractor coordination meeting	Held at minimum weekly to discuss program, site activities, HRCW activities and interfacing work activities for the day, changes to emergency exits from site or work areas, weather, incidents and other	PBS project team and subcontractor supervisors	Subbie meeting Minutes
Toolbox talks	PBS construction workers and subcontractor construction workers weekly meeting to discuss topics such as: <ul style="list-style-type: none"> • HRCW activities • changes to or out of sequence work tasks that are HRCW • alerts • lessons learned • hazard notices and incidents • changes to legislation and codes of practice 	PBS construction workers, subcontractors, and other workers including subcontractor foremen and supervisors	Toolbox talk record
Project review meetings	At maximum 6 weekly intervals or as required, including: upcoming high-risk construction work activities, business reportable incident outcomes and lessons learned, and management of design or other changes with the potential to significantly affect environment, health and safety	Project manager, construction manager and site manager, commercial manager, client representative, and others	Project review meeting minutes



Event	Frequency	Participants	Evidenced
EHS Committee meeting / DWG / Health and safety representative(s)	Weekly meetings as per Consultation Statement or other agreed consultative arrangements inclusive of standard agenda item for upcoming high-risk construction work activities	Management representatives and/or employees, workers, health and safety representative(s), and DWG reps	Notice board(s) Meeting minutes displayed Health and safety representative(s) and EHS Committee / DWG members
Issue resolution	As EHS issues arise and are raised formally	Management representatives and/or employees, workers, health and safety representative(s), DWG reps.	EHS Committee minutes and/or Consultative review and management determination
Training	Commencement of project and annually in line with existing Career Planning Discussion outcomes	PBS salaried and award staff	EHS training planner



A7. PLANT AND EQUIPMENT INSPECTION AND TESTING SCHEDULE

Item	Minimum competency to be held or equivalent	Aust Standard / Code	Inspection / Record Other Required
Atmospheric testing and monitoring equipment	Competent Person. MSAPMOHS217A – Gas test atmosphere	AS 2865	<ul style="list-style-type: none"> Prior to each Confined Space entry. Yearly calibration of equipment required
Anchor Point(s)	Structural Engineer or Advanced Rigger CPCBC4045A - Perform advanced rigging	AS 1891.4	<ul style="list-style-type: none"> Annually 1 person – Fall Restraint = 12kN 1 person – Free Fall = 15kN 2 persons = 21kN
Concrete Line Pump Concrete Boom Pump	Competent Person. CPCCC03052A - Conduct concrete boom delivery operations (PB)	AS 1418.15 AS 2550.15	<ul style="list-style-type: none"> Daily, monthly (line thickness), yearly, 6 yearly
Confined Space	<ul style="list-style-type: none"> Competent Person. RIIWHS202D - Enter and work in confined spaces 	AS 2865	<ul style="list-style-type: none"> Entry permit retained for 1 month Risk assessment retained for 10 years Training records for the term of employment
Crane – mobile Crane – tower Crane – Self Erecting Crane – Gantry >10t	Competent Person <10t = TLID3033 up to 20t = (C2) up to 60t = (C6) up to 100t = (C1) over 100t = (C0) (CT) (CS) (CB)	AS 2550 AS 1418	<ul style="list-style-type: none"> Daily, monthly, yearly, 10 yearly
Electrical – temporary switchboards and portable electrical equipment	Licensed Electrician for RCD testing. Leads and equipment = UEENEEP026A - Conduct In-Service Safety Testing of Electrical Cord Connected Equipment and Cord Assemblies”	AS/NZS 3000:2018 AS 3012 AS 3760	<ul style="list-style-type: none"> RCDs tested monthly and trip times recorded in Electrical Register Distribution boards and electrical leads tested 3 monthly as a minimum and recorded on Electrical Register.
Elevating work platforms Boom type EWP, Scissor Lift	Competent Person <11m = RIIHAN301E >11m = TLILIC0005 – (WP)	AS 2550.10	<ul style="list-style-type: none"> Daily, 3 monthly, yearly, 10 yearly
Explosive Power Tool	Competent Person CPCCCM2007 - Use explosive power tools	AS 1873	<ul style="list-style-type: none"> Daily inspection to the manufacturer’s recommendations dismantled and examined for defects weekly, yearly by manufacturer.



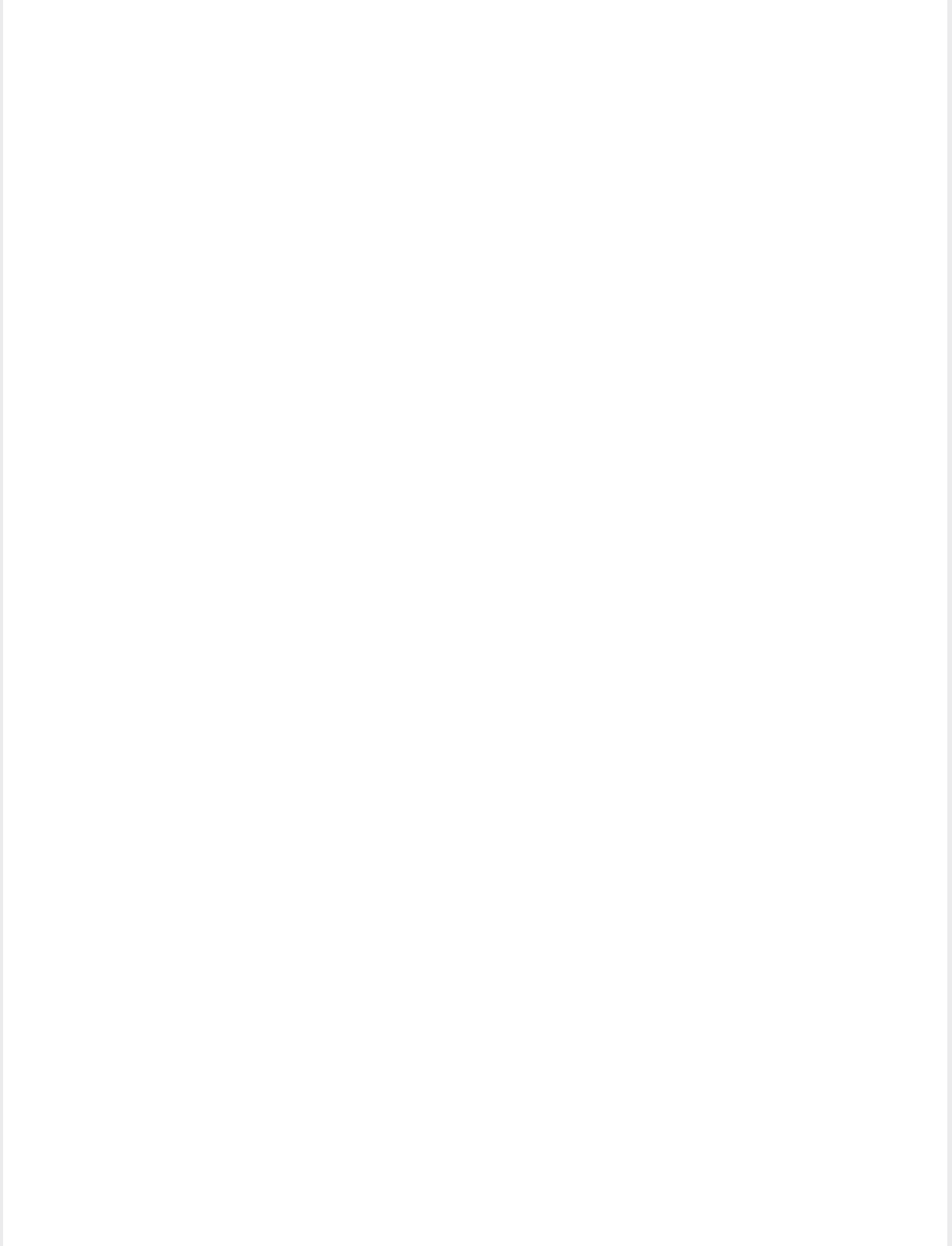
Item	Minimum competency to be held or equivalent	Aust Standard / Code	Inspection / Record Other Required
Fire Fighting Equipment	Competent Person PRMPFES05B - Use portable fire-fighting equipment	AS 1851	<ul style="list-style-type: none"> Regular inspection, 6 monthly tests. Where more than 10 extinguishers are installed, details must be kept on a register.
Fixed platforms and stairs	Competent Person	AS 1657	<ul style="list-style-type: none"> Routine inspection
Forklift Truck	Competent Person TLILIC2001A - (LF)	AS 2359.2	<ul style="list-style-type: none"> Inspection and maintenance as per manufacturer instructions.
Formwork	Competent Person CPC31511 - Certificate III in Formwork/Falsework	AS 3610.1:2018	<ul style="list-style-type: none"> Regular inspection (before concrete placement); Pre-pour checklist; Independent Engineer's Certificate prior to a pour; Engineered Drawings for suspended formwork; Independent Engineer certification back propping
Hoist (personnel and materials)	Qualified Person CPCCLHS3001A - (HP)	AS 2550.7 AS 1418	<ul style="list-style-type: none"> Daily, 3 monthly, yearly, 10 yearly.
Laser Level	Competent Person CPCPCM2027A	AS 2211.1 AS 2397	<ul style="list-style-type: none"> Warning Signage; calibration record
Lifts	Competent Person UEE41110	AS1735.4	<ul style="list-style-type: none"> Regular maintenance to manufacturer's specification, Yearly inspection and testing
Lifting Gear Flat synthetic slings	Minimum - Dogging (DG)	AS1353.2	<ul style="list-style-type: none"> All gear: Labelled, inspection prior to each use and 3 Monthly inspection, test certificate to manufacturer's recommendations
Chains	Minimum - Dogging (DG)	AS3775	<ul style="list-style-type: none"> Labelled, inspection prior to each use; 12 monthly.
Mast-climbing work platforms	Qualified rigger ICTTCR2190A	AS1418.16 AS2550.16	<ul style="list-style-type: none"> Pre-operation inspection before each use, 3 monthly maintenance inspection, 12 monthly full inspection/service; major inspection 10 yearly & 5 yearly thereafter; logbook each climbing drive unit; logbook for checks, faults, repairs.
Oxy/Acetylene/ Flashback arresters	Licensed plumber	AS 4332 AS4603 AS4289	<ul style="list-style-type: none"> Regular inspection and adequate separation and storage. Flashback arrester 12-month test Hoses, gauges and other reticulation items 6 monthly
Personal Protective Equipment	Competent person	Specific to type of PPE	<ul style="list-style-type: none"> Register of Supply



Item	Minimum competency to be held or equivalent	Aust Standard / Code	Inspection / Record Other Required
Rope Access	Competent Person SPRAT Rope Access level 1, 2 or 3	AS 4488	<ul style="list-style-type: none"> • Visual Inspection before each use, 6 monthlies by Competent Person.
Roof safety mesh	Competent Person Cert 3 roof plumbing	AS 4389	<ul style="list-style-type: none"> • Record of inspection to ensure lapped and tied to Standard and meets engineer specifications
Safety Harness	Work at Heights - RIIOHS204A RIIWHS204D CPCCCM2010B	AS 1891.4	<ul style="list-style-type: none"> • Visual Inspection before each use, 6 monthlies by competent person
Safety Lines/fall arrest devices, lanyards (installation)	Structural Engineer or Advanced Rigger CPCCBC4045A	AS 1891.4	<ul style="list-style-type: none"> • 6 monthly Record of review by Competent Person, Training or Toolbox Talk Record. Monitoring by principal contractor to ensure compliance.
Scaffolding	Qualified Person (SB) (SI) (SA)	AS 1576 AS 4576	<ul style="list-style-type: none"> • #Drawing/Elevations; Handover Certificate, monthly inspection, Scaff tag
Swinging Stage	Competent Person - USESSS001A	AS1576 AS4576	<ul style="list-style-type: none"> • Handover Certificate, daily pre-start; monthly inspection

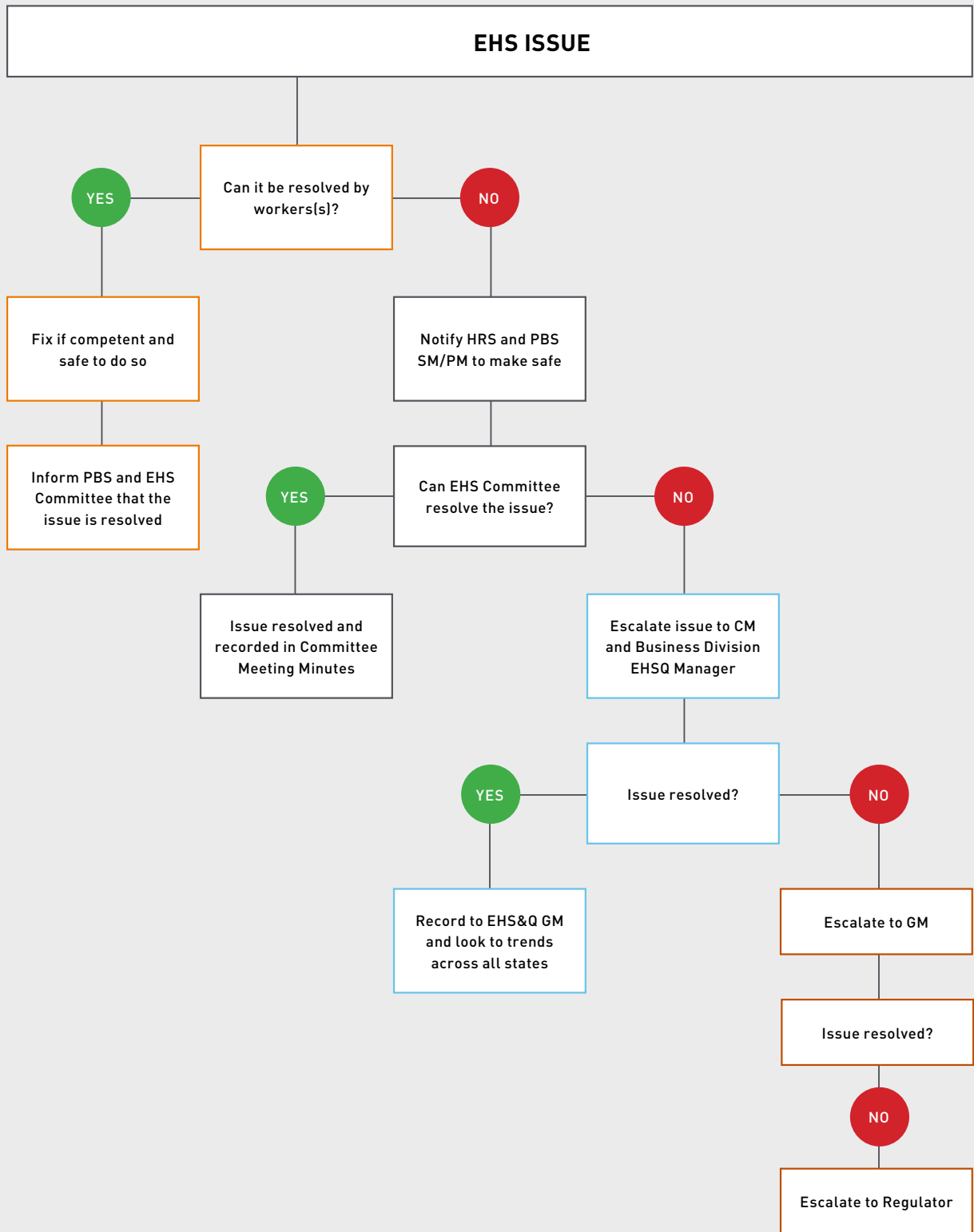


A8. SPECIAL CONDITIONS





A9. WORKPLACE ISSUE RESOLUTION CHART





A10. EHS&Q MANAGEMENT REVIEW MEETINGS

Reporting	By whom	Who receives the report	Frequency
All incident events / Community contacts / Complaints	Project manager / Site manager / Nominated representative	EHS&Q managers	Within 24 hours
OFSC incident reports, including LTI, MTI, dangerous occurrences and reportable/ notifiable incidents	Corporate function EHS&Q General manager	Office of the Federal Safety Commissioner	Within 24 hours
Notifiable incidents	EHS&Q manager, EHS&Q manager / Project manager / Site manager / Nominated representative	Regulatory authority EHS&Q general manager	Immediate
Workers compensation claim notifications	Project manager / Site manager / EHS&Q manager / Return to Work coordinator	Corporate team Workers compensation insurer	Within 5 working days
Positive and negative observations	Project manager / Site manager / EHS&Q coordinator / EHS&Q manager / Contract administrator / Foreman	EHS&Q managers EHS&Q general manager	Within 24 hours
Critical incident notification	EHS&Q general manager	Chief operating officer PBS Board of Directors	Within 1 working day
Business reportable incident notification	EHS&Q coordinators / EHS&Q managers	EHS&Q managers / EHS&Q general manager / construction manager / general manager	Within 1 working day
EHS Performance Report, including statistics - EHS Incident Information (statistics, incident details, injuries, community contacts, HSE instructions, regulatory authority activity or notices, waste)	EHS&Q general manager	PBS Board of Directors	Monthly
Safety Leadership Team Meetings	General manager	Senior Manager Team and Board of Directors	Quarterly
Internal workplace EHS audits All active projects	EHS&Q managers	EHS&Q manager / general managers / construction manager / EHS&Q general manager	Quarterly
Office of Federal Safety Commission Biannual Report, including: injuries, hours worked, and workers compensation claim data analysis Scheme & Non-Scheme	EHS&Q managers / EHS&Q general manager Return to Work (RTW) coordinator	Office of the Federal Safety Commissioner	Twice a year



Reporting	By whom	Who receives the report	Frequency
OFSC Scheme / Non-Scheme project notifications, such as LTI/MTI/Dangerous Occurrences, OFSC end of project report	EHS&Q managers / EHS&Q general manager RTW coordinator	Office of the Federal Safety Commissioner	As required
External EHS management System certification audits	External auditors	EHS&Q managers / EHS managers / EHS&Q general manager Construction manager	As required
National EHS internal Independent audit	EHS&Q general manager	EHS&Q general manager Chief operating officer	Annually
External independent audits	State government Client/other	Senior leadership team EHS&Q managers / Construction manager	Annually
Finance report (EHS section)	EHS&Q general manager	Chief financial officer	Monthly



A11. DEFINITIONS

Agreement	Is an AS2545, SC2, Residential Period Subcontractor Agreement, Consultancy Agreement, Minor Works Agreement, Labour Hire Agreement or Supply Agreement or other like contracts.
ACM	Asbestos containing material.
AFC drawings	Approved for construction drawings.
D&A	Drugs and alcohol.
Competent person	A person who has experience and training in the use of a thing or equipment (equivalent to the Minimum Unit of Competency for that item or action. Annexure 7).
Contractor	Refers to any PBS contractor, subcontractor or supplier (i.e. external providers).
Construction workers	Direct employees of PBS and contractor workers who perform trade and non-trade work on the project site.
Corrective action	Is any action required to rectify and prevent a reoccurrence of a safety or environmental breach, or negative observation
Critical incident	An unexpected event that has potential to create a significant risk. I.e. death, permanent disability, or the potential to cause serious harm to the environment.
DBYD	Dial Before You Dig.
DWP	Documented Work Process (e.g. Job Environmental Safety Analysis – JESA, Safe Operating Process).
EHS&Q	Environment, health, safety and quality.
EHSP	Environment, Health and Safety Plan for a project.
EWP	Elevating work platform - both boom lift and scissor lift.
ESS	Environmental and site safety.
EHS&Q representative	Refers to either: <ul style="list-style-type: none">a. PBS health and safety representative (HSR)b. a PBS EHS&Q Committee member
Environmental aspects and impacts	Activities and products that have potential to generate environmental hazards and have environmental risks. These are defined within this EHS&Q Plan as hazards and risks.
Equipment	An instrument used that can entangle or crush a body part and has an exposed motorized mechanism – such as a cement mixer. Or, needs a safety brake installed (such as a duct lifter).
Formal Correction Notice	To be issued for unacceptable breaches (not in the best interest of the project works and workers); against the site rules and safety at the workplace.
FOP	Falling over protection (referenced to plant protection).



Hazardous/Dangerous goods	Chemicals/substances that may be corrosive, flammable, explosive, spontaneously combustible, toxic, oxidizing, radioactive, biological, water reactive, gases under pressure or chemicals that have the potential to harm the health of a person.
HIRAC	Hazard identification, risk assessment and control.
High Risk Construction Work	As defined within Work Health and Safety Regulation Section 291, the 18 nominated high-risk construction work activities.
Hold point	Nominates a point beyond which a work activity must not proceed without a documented authorisation by the nominated party.
HR SWMS	High risk safe work method statements are required when legislated high risk construction works are carried out.
Incident	An event resulting in a negative environmental impact, injury or illness, property damage or near miss.
Incident investigation	Formal documented process to determine cause and gaps in processes or incidents. A variety of evidence gathering techniques are to be used when conducting incident investigations, such as witness statements, induction records, any related documents to the incident, and so on. Investigations shall be conducted when there is a potential or actual medically treated injury or above relating to persons on the project. Investigations shall be conducted for actual property or plant/vehicle incidents related to the project, and any actual environmental damage caused as a result of works relating to the project.
Life cycle	Design process for a building or structure and documents EHS&Q hazards, opportunities and risk controls associated with construction, occupancy and use, ongoing maintenance and demolition phases.
LTI	A lost time injury that results in time lost from work of one full shift or more.
LTIFR	Lost time injury frequency rate. A statutory performance measure calculated by dividing the number of lost time injuries by the number of hours worked and multiplying it by 1 million.
Manual handling	A hazardous manual task requiring a person to lift, lower, push, pull, carry or otherwise move, hold or restrain any person, animal or thing that involves 1 or more of the following: <ul style="list-style-type: none">a. repetitive or sustained force or a high or sudden forceb. repetitive movement or exposure to vibrationc. sustained or awkward posture
Major / Significant incident	Any LTI, notifiable incident, regulatory notices, environmental damage, property damage, or where deemed by PBS management.
Minor works	Alterations or improvements to an existing structure or property with a contract value under \$250,000.



MTI	A medically treated injury where treatment is administered by or under the order of a qualified medical practitioner.
MTIFR	Medically treated injury frequency rate. A statutory performance measure calculated by dividing the number of MTIs by the number of hours worked and multiplying it by 1 million.
Non-conformance	Refers to quality breaches, procedural gaps and implementation gaps.
Notifiable incident	Means death, serious injury or illness, or significant dangerous occurrence.
PCBU	Person conducting a business or undertaking (this is PBS and subcontractors).
PCBU Responsible Officer	A person who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business or undertaking.
PCG	Project Control Group.
PCR	Post Construction Report.
PMP	Project Management Plan.
Positive and negative observation	An observation on activities observed at a PBS Workplace which is then communicated to the PBS site teams and appointed contractor, either for praise or issue resolution.
PPE	Personal protective equipment.
PPM	Project Procedure Manual.
PSR	Project Status Report.
Qualified	A person who has achieved a competency from a Registered Training Organisation (RTO).
RCD	Residual Current Device.
Relevant authority	Refers to the: <ul style="list-style-type: none">a. Responsible Work Health and Safety authority being either WorkSafe ACT, WorkSafe NSW, Qld Workplace Health and Safety, or Safe Work Australia; orb. Responsible Environmental Protection Authority (EPA) being ACT EPA, NSW EPA, or Qld EPAc. Associated authorities such as local councils, electrical authorities, or police
ROP	Rollover protection.
RTO	Registered Training Organisation.
SDS	Safety data sheet.




Significant design change	Change to design which necessitates revised work practices or methods, using the PBS Risk Matrix, to determine (medium or above) risk levels to health and safety of individuals.
STF	Slips, trips and falls.
Sustainable development	Development that meets the needs of the present generation without comprising the ability of future generations to meet their own needs. This is based on considering environment, social and economic factors to optimise the overall benefit for all.
TMP	Traffic Management Plan. Note: in the ACT, these are called a Temporary Traffic Management Plan (TTMP).
TCP	Traffic Control Plan.
Toolbox talks	Regular, recorded consultative meetings between management and employees/site personnel to discuss issues relating to their work practices, processes, and working environment.
UXO	Unexploded Ordinance.
VOC	Verification of Competency (follow OFSC Guidance material http://www.fsc.gov.au/sites/FSC/Search/Results?k=VOC)
WHS	Work health and safety.



A12. SIGNATURES

When I sign below, I agree that I have read and understood this Project EHS Plan and my role and responsibilities to make sure this workplace remains a safe place to work.

Name	Signature	Date
		

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