OrangeSky

Orange Sky Australia Work Health and Safety Management System



Table of Contents

Commitment to Health and Safety	
Introduction	3
OSA WHSMS Approach	4
Element 1: Leadership, Commitment & Accountability	6
Element 2: WHS Policy	8
Element 3: WHS Planning	9
Element 4: Legal and Other Requirements	10
Element 5: Performance Indicators	11
Element 6: Training and Competence	12
Element 7: Consultation and Communication	13
Element 8: Document Control, Record Management	14
Element 9: Risk Management	15
Element 10: Suppliers, Contractors and Partners	16
Element 11: Emergency Management	19
Element 12: Performance Evaluation and Reporting	21
Element 13: Incident Management	23
Element 14: Management Review	25
Definitions	27

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 1 / 27



Commitment to Health and Safety

Orange Sky Australia (OSA) is committed to having safe, effective systems and practices in place for the activities it controls and has influence over. Orange Sky's Workplace Health and Safety Management System (WHSMS) aims to maximise safety and efficiency, promote health and wellbeing and facilitate Zero Harm to our employees, volunteers, friends, contractors, visitors, the environment and the community in which we operate.

OSA will achieve its goals by meeting and exceeding performance requirements and obligations identified in the WHSMS and by making a commitment to drive continual improvement throughout our operations.

Lucas Patchett (CEO) Orange Sky Australia

Introduction

OSA's workplace, health and safety objectives and goals are communicated and implemented through the Workplace Health and Safety Management System.

The WHSMS incorporates all workplace health and safety requirements within the organisation and is designed to provide OSA with a consistent approach to health and safety management and to allow for the integration of health and Safety management processes with other business requirements.

The WHSMS is a framework that sets the foundation for continual improvement through the application of consistent requirements across OSA's operational activities, including:

- identification and implementation of statutory obligations and other requirements to ensure compliance;
- implementation of risk management processes;
- identification of hazards and the treatment of their associated risks;
- establishment of clear standards of competency for workers and the provision of training to promote expected WHS behaviours and leadership;
- management of contractors and suppliers of OSA goods and services;
- involvement of stakeholders in managing health and safety;
- establishment of reviews including audits and evaluations, and the reporting of outcomes from these reviews.

About this manual

This manual (policy) outlines the framework, accountabilities and function of the WHSMS and provides direction and reference to associated documentation and performance requirements.

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 2 / 27



This policy and associated WHSMS documentation are available in electronic format and hard copy within the OSA Knowledge Management System. Modifications to this policy are made periodically to ensure it is current. If using a printed version of this document, always check to ensure the version you are using is current.

OSA WHSMS Approach

The WHSMS functions within OSA's wider business systems and provides the basis for delivering WHS performance and driving continual improvement through the application of the Plan-Do-Act-Check (PDCA) methodology.

OSA has adopted the Australian and New Zealand Standard AS/NZS 4801: 2001 Occupational Health and Safety Management Systems – General Guidelines on Principles, Systems and Supporting Techniques, which underpins the WHSMS framework, documentation and performance requirements.

The WHSMS is premised on the belief that the effective management of health and safety is based on a systematic approach with appropriate governance structures in place.

Each section of the continual improvement methodology is recognised through the 14 WHSMS Elements which explain how the objectives of OSA's WHS policy shall be achieved.

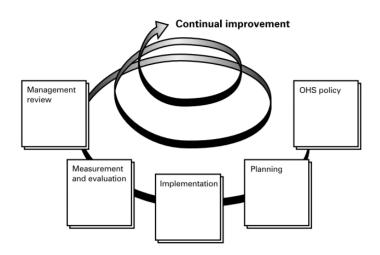


Figure 1: WHS Management System Model

Application of the WHSMS

The WHSMS applies to all OSA activities and services, which includes planning, operations, projects, the design and modification of vehicles and other equipment.

The WHSMS processes and supporting documentation apply to all workers employed by, or working for OSA, or involved in activities associated with OSA.

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 3 / 27



The procedures and controls specified in the WHSMS apply to all contracts accepted or undertaken by OSA unless otherwise specified in writing, which is subject to the change management process (as outlined in Element 9).

WHSMS Documentation

The WHSMS consists of various levels of documentation, with each document type having its own status, contents and purpose. WHSMS documentation is arranged in a hierarchical structure.

WHSMS document hierarchy

The WHSMS document hierarchy is explained below.

Policies

There is a single WHS Policy, approved by the Chief Executive Officer of OSA. It establishes OSA's WHS objectives and expectations across all levels of the organisation.

Procedures

OSA Procedures mandate the minimum standards, responsibilities and requirements that shall be followed and implemented to achieve the WHS policy and WHSMS objectives.

Management Plans

WHS Management Plans describe and set out the actions required to:

- Implement the WHSMS throughout the organisation
- Improve WHS performance in specific areas of the WHSMS or operational activities

WHS management plans ensure the management of WHS activities are planned, resourced, have responsible owners, are implemented and are reviewed.

Safe Work Procedures

Safe Working Procedures provide detailed information and instructions to workers as to how an activity or task is to be performed. They have a format which is easy to refer to and provide clear unambiguous instructions required for specific processes, operations, activities and tasks.

Supporting Documentation

Supporting documentation refers to forms, checklists, registers and other tools, developed to support procedural implementation. Supporting documents are used during day to day operations and activities. They provide evidence of performance to requirements of the WHSMS and of the effective implementation of the WHSMS.

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 4 / 27



WHSMS Elements

The WHSMS is divided into 14 Elements structured around the PDCA methodology for continual improvement.

The WHSMS Elements are a set of statements defining the requirements in relation to WHS objectives detailed in the WHS Policy. Each Element sets out to achieve a specific objective that enables OSA to best identify and manage its various WHS threats and opportunities. Many of the elements are interrelated. Each Element contains an overall intent statement and specific requirements.

Effectively, the WHSMS Elements set out 'what' has to be achieved in relation to WHS management without including complete details as to 'how' these requirements are to be met. The complete details of 'how' WHSMS requirements shall be met are detailed in WHS Procedures, Management Plans, Safe Work Procedures and supporting documentation.

The objectives of the WHSMS Elements are to:

- Set and formalise expectations for WHS management
- Provide auditable criteria against which the WHSMS can be measured
- Provide a framework from which to drive continual improvement

WHSMS 14 Elements

Element 1: Leadership, Commitment and Accountability Element 2: WHS Policy	Commitment and Policy	
Element 3: WHS Planning		PLAN
Element 4: Legal and Other Requirements	Planning	
Element 5: Performance Indicators		
Element 6: Training and Competence		
Element 7: Consultation and Communication	Implementation	
Element 8: Document Control and Record Management		
Element 9: Risk Management	Implementation	DO
Element 10: Suppliers, Contractors and Partners		
Element 11: Emergency Management		
Element 12: Performance, Evaluation and Reporting	Measurement	
Element 13: Incident Management	and Evaluation	CHECK
Element 14: Management Review	Review and Improvement	ACT

Document Number: OSA-AU-HQ-WHS-POL-001 Issued Date: 29/03/2021
Revision Number: 1.0 Page Number: 5 / 27



Element 1: Leadership, Commitment & Accountability

Intent - To ensure leadership expectations, organisational structure and responsibilities are clearly defined, documented and communicated to support and achieve the implementation, maintenance and continual improvement of health and safety management.

Element 1: Leadership, Commitment and Accountability, aims to ensure the organisational accountability and leadership is established to allow effective implementation and operation of the WHSMS.

1.1 Leadership and structure

All personnel in a management position within OSA shall be active in leading, supporting and participating in the implementation, monitoring and maintenance of the WHSMS.

Managers shall demonstrate a visible and pro-active commitment to WHS by displaying positive behaviours towards OSA's WHS objectives and by meeting the requirements of their position descriptions.

Managers shall provide sufficient materials and time as required to effectively implement and maintain the WHSMS and actively partner with workers to achieve a safer and healthier workplace.

The Senior Leadership Team (SLT) shall regularly review WHS performance to assess whether WHSMS objectives are being met.

The SLT of OSA shall monitor and review leadership commitment, behaviour and performance through periodic observations, feedback loops including worker and client surveys and annual performance reviews.

The SLT has developed and maintains an Organisational Chart to ensure all workers and stakeholders are familiar with the people structure of Orange Sky.

1.2 Responsibilities and accountabilities

All OSA employees, and other stakeholders appointed to work with OSA have the authority to place WHS considerations above other priorities. This extends to the authority of not doing something, unless it can be done safely, without posing a risk to themselves, others or the environment.

All workers, and other stakeholders appointed to work with OSA have a duty to carry out their work in accordance with the WHSMS to effectively manage WHS risks. At every level of the organisation OSA workers, and other stakeholders appointed to work with OSA are responsible for WHS, with the ultimate responsibility resting with the Chief Executive Officer of OSA.

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 6 / 27



1.2.1 Position descriptions

Employee WHS responsibilities and accountabilities shall be documented in position descriptions which are issued to all workers upon commencement with OSA.

1.2.2 Contractors and other stakeholders

Contractor WHS responsibilities shall be included in contract documents, and communicated during contractor engagement and the induction process. WHS responsibilities of other stakeholders, including visitors and volunteers shall be communicated during the induction and training processes.

Element 1: Documentation

Organisational Chart

Position Descriptions

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 7 / 27



Element 2: WHS Policy

Intent - To define the overall WHS objectives of OSA and communicate the organisation's commitment to improving WHS performance.

Element 2: WHS Policy, aims to ensure WHS policies are developed, implemented and maintained and all OSA workers are aware of, can access and are competent in meeting the requirements of the policies.

2.1 WHS policy

OSA has established a WHS Policy which:

- states the overall WHS objectives of the organisation and includes a commitment to:
 - o continual improvement aimed at eliminating work related injury and illness;
 - o compliance with WHS legislation and other requirements;
 - establish accountabilities and responsibilities for the management of health and safety throughout OSA;
 - promote consultation and engagement with workers, suppliers, clients and other stakeholders as required;
- is documented and communicated to workers, and is:
 - o available on the OSA Portal and in hard copy at OSA HQ;
 - communicated to workers during inductions and made available to interested parties upon request;
- is version controlled;
- is reviewed annually (or at a frequency dictated by changed conditions and information);
- is reviewed and approved in consultation with relevant stakeholders and signed and dated by the Chief Executive Officer of OSA.

2.2 Other policies

Other policies shall be developed as required to support the WHS Policy and other company specific hazards, risks and objectives. All policies shall be developed, reviewed, approved and communicated in accordance with the requirements of the WHS Policy above. All policies shall outline OSA's objectives and commitments in the area which the policy addresses.

All policies shall be formally endorsed by the Chief Executive Officer of OSA and contain a signature and date of issue.

All policies shall be reviewed annually, which includes consultation with workers during the review process. These annual reviews will be signed off by the OSA Board.

Element 2: Documentation

- WHS Policy
- Return to Work Policy
- Fit for Work Policy

- Bullying and Harassment Policy
- Equal Opportunity Policy

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 8 / 27



Element 3: WHS Planning

Intent - To ensure the management of WHS is adequately planned and resourced to enable successful implementation, maintenance and continual improvement of health and safety management.

Element 3: WHS Planning, aims to ensure planning processes and frameworks help drive best practice performance and continual improvement.

3.1 WHS Management plans

WHS management plans shall detail how objectives will be achieved, including provision of resources, specialist professional support (if and when required), equipment, etc., and shall include assigned responsibilities and timeframes for completion.

WHS management plans shall be reviewed by the Chief Financial Officer (CFO) of OSA in consultation with workers and other relevant stakeholders as required or if significant changes in operating conditions arise that affect planned objectives.

3.2 Resources

OSA shall identify and provide adequate and appropriate resources for the implementation, maintenance and continual improvement of health and safety management.

3.2.1 Budget

OSA shall allocate funds for the management of WHS. The budget period for WHS allocated funds shall be in accordance with the financial year period used for income tax reporting. The WHS management budget shall consider expenditure required for:

- legal obligations and other requirements;
- resources (human resources, plant/equipment, technical expertise etc.);
- operational requirements (equipment, inspection and testing and calibration services etc.);
- WHS management plan requirements.

Element 3: Documentation

WHS Management Budget Spreadsheet
 WHS Management Plan Template

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 9 / 27



Element 4: Legal and Other Requirements

Intent - To identify, document, comprehend, make accessible and comply with all relevant legislation and regulations, contractual and other health and safety requirements and commitments.

Element 4: Legal and Other Requirements, aims to ensure that all relevant legislation, industry standards, codes of practice and other requirements applicable to OSA are identified, documented, accessible, understood and complied with by all workers and other relevant stakeholders.

OSA is committed to complying with all relevant legislation. OSA maintains a Legislation Compliance Register containing a list of all WHS related legislation and codes of practice, including but not limited to:

- Model Work Health and Safety Act and Regulations 2011;
- Occupational Health and Safety Act 2004;
- Occupational Health and Safety Regulations 2017;
- Occupational Safety and Health Act 1984;
- Occupational safety and Health Regulations 1996;
- Workers Compensation and Rehabilitation Act 2003;
- Workers Compensation and Rehabilitation Regulation 2014;
- Electrical Safety Act 2002;
- Anti-Discrimination Act 1991;
- Environmental Protection (Waste Management) Regulation 2000.

Legal and other requirements shall be communicated to workers through the induction and training process.

Changes to legislation and other requirements that are applicable to OSA operations shall be managed by the WHS Manager. The WHS Manager shall advise the SLT within 10 business days of any changes to legislation and/or other requirements applicable to OSA operations. Upon receipt of advice the SLT shall in consultation with relevant stakeholders discuss and implement the required changes to relevant documentation, processes and practices.

Changes to legal and other requirements shall be communicated to relevant stakeholders via the induction process, prestart and toolbox talks and electronic messaging applications such as email or ASANA. Copies of current applicable legislation, including Acts, Regulations, Codes of Practice and Australian Standards shall be made available to workers in electronic format upon request.

Element 4: Documentation

Legislation Compliance Register

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 10 / 27



Element 5: Performance Indicators

Intent - To drive continual improvement through a planned, measurable and achievable approach and to ensure WHS performance is reviewed regularly to assess whether objectives and key results are being met.

Element 5: Performance Indicators, aims to ensure established objectives and key results drive best practice performance and continual improvement.

OSA shall develop objectives aimed at improving WHS performance, and establish key results that are realistic, and time bound with measurable parameters to measure performance. Positive performance indicators (PPI's) shall be established and implemented as a means to obtain information about what is happening within the organisation in regard to health and safety and whether objectives and key results are being met.

The CFO of OSA and the WHS Manager, in consultation with workers and other relevant stakeholders shall develop and establish fit for purpose objectives, key results and PPI's that are meaningful and promote engagement at all levels of the business. Objectives, key results and PPI's shall be communicated to workers and other relevant stakeholders during inductions and other training processes.

Objectives, key results and PPI's are reviewed annually by the SLT in consultation with workers and relevant stakeholders. Objectives and PPI's shall be revised in consideration of performance outcomes, modification of risk profiles and/or work methodologies to ensure they remain relevant and responsive to the growth and development of OSA.

Element 5: Documentation

OSA WHS Objectives, Key Results and PPI's

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 11 / 27



Element 6: Training and Competence

Intent - To ensure processes are developed and implemented to provide OSA workers and other relevant stakeholders with the appropriate WHS skills, knowledge, experience and awareness, in order for them to undertake their work safely and to the required standard.

Element 6: Training and Competence, aims to ensure all workers are aware of WHSMS requirements, hazards, risks and controls, and are trained and competent to conduct their activities in a safe and responsible manner.

OSA shall implement and maintain a Training Program to achieve WHS awareness and role-based competence. The Training Program shall include:

- A *Training Needs Analysis* to identify training needs relating to performing work activities competently, including WHS training. Training needs shall be identified through legislative requirements, position descriptions, WHSMS, operational hazards and risks).
- A *Training Matrix* to document the training requirements of specific roles within the organisation and the completion status of the required training and/or competencies. The Training Matrix shall include mandatory qualifications/competencies for roles requiring technical certification, registration or licensing.
- Individual Training Plans that are based on an assessment of a worker's current capability against their required training and competency profile detailed in the Training Matrix.
- An *Induction Program* to ensure workers and other relevant stakeholders appointed to work with OSA are informed of OSA's WHS requirements, hazards and risks, controls implemented and expected behaviours to ensure risks to themselves and others is minimised.

The CFO and WHS Manager of OSA in consultation with workers and other relevant stakeholders shall develop, implement, maintain and review the Training Program to ensure it is fit for purpose. The OSA Training Program shall be reviewed and revised by the SLT of OSA in consultation with workers and other relevant stakeholders, at least annually, or as dictated by organisational changes, as a result of an incident, new technology, plant or equipment and the like.

The OSA Training Program, supporting processes and mechanisms shall be communicated to workers and other relevant stakeholders during inductions and other training processes.

Element 6: Documentation

- Training Management Procedure
- Training Needs Analysis

- Induction Program
- Training Matrix

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 12 / 27



Element 7: Consultation and Communication

Intent - To ensure all workers are engaged in all aspects of health and safety initiatives and formal and informal mechanisms for communication are established.

Element 7: Consultation and Communication, aims to ensure that effective consultation and participation processes are in place and transparent and honest communication with stakeholders and workers is implemented and maintained.

OSA is committed to engage workers and provide opportunities for input into WHS matters in accordance with legal and other obligations and duties. OSA acknowledges that worker input and participation improves decision-making about WHS matters and assists in reducing work-related injury and illness. To facilitate the involvement and engagement of workers and other relevant stakeholders, OSA will:

- Ensure the necessary workers and relevant stakeholders will be involved in the development, implementation and review of procedures for hazard identification and risk management.
- Consult with workers and relevant stakeholders where there are any changes that affect workplace health and safety.
- Consult with workers and relevant stakeholders when identifying hazards and assessing risks
 arising from work carried out or to be carried out, including making decisions about ways to
 eliminate or minimise those risks.
- Use formal and informal consultation, communication and participation processes, including prestart huddles and toolbox talks, meetings (online and face to face), ASANA, EDMs (electronic direct mail), newsletters, text messages and social media.
- Ensure record management and reporting is accurate and kept up to date.

Element 7: Documentation

ASANA Consultation Task Feedback

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 13 / 27



Element 8: Document Control, Record Management

Intent - To effectively identify, manage and maintain health and safety documentation and information.

Element 8: Document Control, Record Management, aims to ensure that documents are current and accessible and records are secure and retained appropriately.

Documentation is a key part of the WHSMS and is tailored to meet OSA's operational needs and is available in both print and electronic formats. Operational processes and procedures are defined, documented, reviewed and updated as necessary to ensure they remain current and comprehensive. OSA has defined the various types of documents it uses and their purpose which specify operational procedures and controls.

8.1 Document control

OSA WHSMS documentation is maintained in electronic format within the OSA Knowledge Management System which is accessible from the OSA Portal. Each document has a unique document number, revision number and date of issue. The SLT are responsible for ensuring the OSA Portal contains all required WHS documentation.

8.1.2 Managing Documentation in Hard Copy

Workers have a responsibility to ensure they are using the most current versions of WHS documentation and as such shall be required to review any hard copy documentation annually to ensure hard copy documentation is up to date.

8.2 Records management

OSA manages its records by ensuring they are collected, filed, stored and retained either electronically, in hard copy or both. Records are indexed and retrievable as required. Records include:

- Risk Assessments;
- Incident Reports, investigations and corrective actions;
- WHS training activities;
- inspections and maintenance activity;
- supplier and contractor information;
- WHS audits and reviews.

Element 8: Documentation

Knowledge Management System

Document Register

WHS Legislation Compliance Register

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 14 / 27



Element 9: Risk Management

Intent - To systematically identify, analyse, evaluate, control and communicate WHS hazards and risks associated with OSA operations and activities.

Element 9: Risk Management, aims to ensure that processes are developed and implemented that effectively manage hazards and risks in the places we work and the way in which we work.

OSA has adopted a comprehensive risk management approach to ensure that WHS risk management and performance goals are achieved. OSA has adopted the principles and methodologies for risk management in accordance with Australian Standards AS/NZS ISO 31000 Risk Management – Principles and Guidelines.

OSA's risk management approach addresses the following broad areas:

- WHS risks associated with assets, operations and activities shall:
 - o be managed and communicated using an integrated risk management process;
 - o apply statutory requirements, industry best practice and/or leading standards to the design, construction, operation, and maintenance of plant and equipment;
 - o include the communication of significant risks to interested and affected parties.
- Task and job hazards shall be systematically assessed by those undertaking the work using a
 risk assessment process that they have been trained to use. This process shall be used to
 identify, understand, document and communicate job and task hazards before commencing
 work through to its completion.
- Workers and other stakeholders will be provided with personal risk management training to minimise the risk of personal injury and environmental impact arising from day to day activities. This shall include confirming new and existing workers are familiar with hazards/risks and the controls listed in the OSA risk register and recorded in risk assessments.

9.1 Risk management framework

OSA shall maintain a Risk Management Framework and Risk Management Procedure consistent with AS/NZS ISO 31000 Risk Management – Principles and Guidelines. The Risk Management Procedure includes:

- the activities, operations, products and services that risk management processes shall be applied to;
- the processes, tools and frequency in which hazards and risks shall be identified, assessed, prioritised and controlled, including provision of the hierarchy of risk control;
- requirement to apply statutory requirements, industry best practice and/or leading standards to the design, construction, operation, maintenance and modification of plant and equipment;
- responsibilities and accountabilities for the management of risks;
- provision of risk treatment plans;
- the process of documenting, communicating and reporting hazard and risk information to workers involved in the operations / activities;
- process of periodically reviewing, evaluating and updating hazard and risk information;
- requirement for ongoing monitoring and review of the effectiveness of risk management processes and practices;

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 15 / 27



- provision of adequate resources to ensure that any workers and relevant stakeholders have the skills, knowledge and equipment to safely perform their tasks;
- recording and reporting, e.g. risk register;
- management of change process;
- requirement of risk communication and consultation.

9.1.1 Risk Register

OSA shall maintain a Risk Register to document activities and associated hazards and risks over which OSA has control or influence. The Risk Register shall be prepared and maintained using an electronic spreadsheet program, and reviewed every 12 months (or when changes to managed risks are identified) to ensure the risks and their associated controls continue to be applicable, relevant, and effective in controlling the risks to as low as reasonably practicable.

9.1.2 Hierarchy of Risk Controls

The hierarchy of controls is applied when managing OSA's identified risks. This requires adopting the highest ranked control measure that is reasonably practicable and in the following order:

1. Elimination

2. Substitution

3. Isolation

4. Engineering

5. Administrative

6. Personal protective equipment or

a combination of measures

9.1.3 Risk Communication and Consultation

Open, two-way communication and consultation with internal and external stakeholders must occur throughout the risk management process.

Internal and external communications shall provide those responsible for implementing risk management activities, and those with a relevant interest in the risk management process, with an understanding of the basis on which decisions are made and why particular actions are required. Communication and consultation shall be based on a participative approach to support:

- effective risk identification;
- the consideration of a broader range of expertise in risk analysis;
- the consideration of a range of views in risk evaluation;
- ownership of risk including its controls and ongoing treatment.

9.1.4 Training

OSA shall ensure any internal or external personnel required to undertake risk assessments complete training appropriate to the process being applied and the risk being assessed.

Following changes to risks and their management, training plans of workers and other relevant stakeholders who are or could be exposed to the risks shall be reviewed, and if required additional training or refresher training provided to address the management of the change.

9.1.5 Residual WHS Risks

Where after risk treatment the residual risk associated with an operational WHS risk lies within the 'High' range, the activity should be stopped until advice has been obtained from the Subject Matter

Document Number:OSA-AU-HQ-WHS-POL-001Issued Date:29/03/2021Revision Number:1.0Page Number:16 / 27



Expert and Orange Sky's WHS Manager to confirm what additional control actions might be employed and to obtain formal approval to tolerate the current risk levels and continue operations.

9.1.6 Management of Change

OSA shall ensure it continues to systematically manage change to its operations to minimise negative consequences. These changes include those to plant, equipment, processes, activities, products, services, the physical environment and workers and other relevant stakeholders.

The change management process shall include identifying actual or potential changes. Ensuring information regarding the change is communicated and that records and plans relating to changes are maintained.

Hazard identification and risk management procedures, processes and changes to hazards and risks shall be communicated to workers and relevant stakeholders during inductions and other training processes, meetings and briefings.

9.2 Operating controls

OSA has and will continue to develop operating procedures and/or Safe Work Procedures (SWPs) that detail the controls required to manage the risks associated with OSA operations and activities. These procedures shall reflect applicable operating criteria and statutory obligations to ensure workers are aware of the issues associated with work tasks, and the controls and steps required for doing the task safely. The procedures will be communicated and available to workers and other stakeholders, as applicable.

Element 9: Documentation

- Risk Management Framework
- Risk Management Procedure
- Risk Register
- Risk Assessments
- Safe Work Procedures
- Workshop Procedure
- Electrical safety (incl. inspection & testing)
- Use, storage and handling of hazardous substances
- Journey management
- Manual handling and ergonomics
- Plant and equipment incl. maintenance
- Work environment (hot/cold)
- Working at height, falls and dropped objects

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 17 / 27



Element 10: Suppliers, Contractors and Partners

Intent - To ensure suppliers, contractors and partners meet the requirements of OSA's WHSMS and the risks associated with procured materials, equipment, labour and the supplying of goods and services are effectively managed.

Element 10: Suppliers, Contractors and Partners, aims to ensure that contracting of services, purchase, hire or lease of equipment or materials and relevant activities with partners are performed in such a manner so as to minimise WHS risk.

The SLT of OSA in consultation with workers and other relevant stakeholders directly affected by the introduction of goods and services into the workplace shall develop, implement and maintain fit for purpose procedures to ensure supplier, contractor and partner standards align with those of OSA, and to ensure that contracting of services, purchase, hire or lease of equipment or materials and relevant activities with partners are performed in such a manner so as to minimise WHS risks.

Procedures and processes relating to suppliers, contractors and partners shall be communicated to workers and other relevant stakeholders during inductions and other training processes, and during meetings and briefings.

10.1 Supplier, contractor and partner selection

The selection of suppliers and contractors is based on their ability to supply materials and equipment and/or complete contracted work in a manner that minimises risk to OSA, and is not solely based on price.

A register of approved and accepted suppliers and contractors shall be established and maintained by OSA. The Register of Approved Suppliers and Contractors shall be reviewed annually, or at a frequency dictated by organisational change and operational demands.

10.2 Supplier and contractor management

OSA ensures supplier and contractor service agreements are adequately managed to minimise WHS risks, this includes:

- ensuring contractor/supplier compliance with the OSA WHSMS;
- requiring contractors/suppliers to provide technical specifications and information on hazards associated with their services, equipment or materials prior to supply or commencement of works;
- shared duties pertaining to OSA and contractor duty holders to ensure duties are clearly understood in accordance with statutory requirements.

Element 10: Documentation

Register of Approved Suppliers and Contractors

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 18 / 27



Element 11: Emergency Management

Intent - To prevent the occurrence of, ensure preparedness for and mitigate the impacts of crises and emergency events.

Element 11: Emergency Management, aims to ensure that potential crisis and emergency situations are identified and effective planning of the actions required in response is undertaken and communicated to all workers and relevant stakeholders.

11.1 Planning

OSA shall develop and maintain a Crisis and Emergency Management Plan that is based on credible emergency and crisis scenarios OSA may face at HQ or on a shift. Suitable responses will be devised to address each of the anticipated events and consequences. This process will take account of relevant standards, industry practice and specialist advice and address the following as a minimum:

- emergency roles and responsibilities and key personnel;
- details of emergency service providers and other relevant contacts;
- internal and external communication plan and the means of communicating with (internal and external) stakeholders during an emergency (e.g. mobile phones, two-way radios, etc.);
- procedures for responding to likely scenarios, such as fires and medical emergencies and how they will be documented, communicated and displayed;
- a description of the resources and emergency equipment required for the management of emergencies, including first aid equipment, firefighting equipment and how this equipment will be made available and maintained;
- training and resources required to prepare workers to use specific emergency response equipment.
- plans and schedules for testing for effectiveness of crises and emergency management scenarios, equipment, communication devices and procedures.
- process for debriefing and provision of trauma counselling.

11.2 Communication

The OSA Crisis and Emergency Management Plan shall be:

- communicated to workers and other stakeholders during induction and training processes and made available to interested parties as required;
- communicated to relevant external stakeholders;
- made available to volunteers via the OSA Portal with an Emergency Management Guide available in every OSA van or asset;
- printed and made available to workers at the OSA HQ.

11.3 Review and Evaluation

The SLT shall be responsible for the coordination and testing of the Crisis and Emergency Management Plan to ensure the effectiveness of response capabilities. The Crisis and Emergency Management Plan shall be tested in full every 12 months.

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 19 / 27



Operational changes (e.g. changes to equipment, processes) as well as changes to legislative and regulatory requirements shall trigger a review of the OSA Crisis and Emergency Management Plan and associated supporting documentation and practices. Reviews and evaluations shall be conducted by the SLT of OSA in consultation with workers and other relevant stakeholders.

Changes to the Crisis and Emergency Management Plan, procedures, response practices and warning systems shall be communicated to workers and other relevant stakeholders through the induction process and team meetings.

Element 11: Documentation

- Crisis and Emergency Management Risk Assessment
- Crisis and Emergency Management Plan
- HQ Emergency Management Plan
- Emergency Management Guide

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 20 / 27



Element 12: Performance Evaluation and Reporting

Intent - To ensure workplace health and safety performance is measured, evaluated and reported to assess the implementation and effectiveness of the OSA WHSMS and seek opportunities for improvement.

Element 12: Performance, Evaluation and Reporting, seeks to ensure the WHSMS is monitored, audited and reviewed to measure performance, assess compliance, identify trends and drive continual improvement.

OSA shall assess the effectiveness of the WHSMS through the following activities:

- monitoring the effectiveness of risk controls associated with hazards, and other indicators that
 provide verifiable evidence of conformance e.g. inspections, audits, compliance reviews,
 workplace observations;
- classifying incidents according to their actual or potential severity;
- communicating relevant lessons from incidents to OSA workers and other stakeholders who may benefit from the knowledge;
- routinely analysing the causes of incidents and impacts to identify trends or common system deficiencies;
- WHS inspections and audits of activities and systems conducted at frequencies and with scopes determined by risk;
- reporting and addressing non-compliance and improvement opportunities identified through monitoring activities, and confirming the effectiveness of corrective and preventative actions.

12.1 WHS activity schedule

An annual WHS Activity Schedule shall be developed to record WHS activities required to be completed in accordance with this and other elements of the WHSMS that stipulate the completion of tasks and activities at particular frequencies, e.g. inspections, audits, management reviews, meetings, toolbox talks etc.

The OSA WHS Activity Schedule shall be established and maintained by the WHS Manager and communicated to workers and other relevant stakeholders during induction and other training processes. The WHS Activity Schedule shall be available in electronic format.

12.2 Corrective and preventive action

The findings and recommendations reached as a result of inspections, audits and other reviews of the WHSMS shall be documented in an ASANA task, and the necessary corrective and preventative actions identified.

The SLT shall ensure that corrective and preventative actions are documented and implemented and that there is a process for the systematic follow up of corrective and preventative actions to ensure their effectiveness.

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 21 / 27



A Corrective and Preventative Actions Register has been developed and is maintained and reviewed on ASANA to assist with the tracking and status of corrective and preventative actions. The register shall include due dates, resources and person/s responsible for completing the actions.

The SLT in consultation with workers and other relevant stakeholders shall work together to identify and implement appropriate corrective and preventative actions applicable to the nature of the issue and/or non-conformance identified. Corrective and preventative actions proposed shall consider the hierarchy of controls to ensure the hazard/risk associated with the issue and/or non-conformance is managed to as low as reasonably practicable.

Corrective and preventative actions as a result of inspection and testing, audits and other reviews of the WHSMS shall be communicated to workers and other relevant stakeholders as applicable, during meetings and briefings.

Element 12: Documentation

WHS Activity Schedule

 Corrective and Preventative Actions Register

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 22 / 27



Element 13: Incident Management

Intent - To ensure all incidents, including near misses, are reported, investigated and analysed. Appropriate corrective actions are identified and implemented and learnings from incidents are shared.

Element 13: Incident Management, seeks to ensure all incidents and near misses are reported, investigated, analysed and treated in a timely manner and corrective and preventive actions are managed, reviewed and lessons learnt shared.

13.1 Incident management

OSA is committed to the recognition, response, reporting and investigation of incidents, including near misses. To demonstrate this commitment, the SLT of OSA in consultation with workers and other relevant stakeholders shall develop, implement and maintain an Incident Reporting and Investigation Procedure for responding to and addressing incidents. The Incident Reporting and Investigation Procedure shall include provision of the following:

- processes that allow for the effective and timely response to incidents;
- processes and mechanisms for the notification, reporting and recording of incidents (internal, external and statutory);
- incident categories, e.g. injury/illness, property damage, near miss etc;
- incident investigation methodology;
- requirement of thorough and timely investigations that are completed by competent persons to determine the causes of, and contributing factors to incidents;
- assigning and completing corrective actions to minimise the re-occurrence of incidents, and minimise or mitigate the severity and duration of their impact, and managing corrective actions to minimise reoccurrence;
- communicating relevant findings and lessons from incidents throughout the organisation and to others who may benefit from the knowledge;
- mechanisms for communication of incidents and incident investigation outcomes, including feedback mechanisms;
- responsibilities and accountabilities for notification, reporting, recording and incident investigation.

13.1.1 Incident Management within ASANA

The SLT has established, implemented and maintains an Incident Management project within ASANA containing a record, summary and corrective actions of all incidents that occur within the organisation.

13.2 Injury management and return to work

OSA's injury management and return to work processes and mechanisms are designed to return injured and ill workers to pre-injury fitness and duties as soon as it is safely practicable.

OSA ensures the adequate and appropriate management of work related injury and illnesses by:

- roles and responsibilities, including statutory obligations and specific expertise required;
- injury management process, including post injury or illness treatment and notification;

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 23 / 27



- developing suitable duties and return to work plans;
- consulting and engaging with rehabilitation providers;
- on-going return to work monitoring;
- engaging in workers compensation claims, reviews and dispute resolution in good faith;
- appropriate record keeping and management.

Element 13: Documentation

- Incident Reporting, Recording and Investigation Procedure
- Injury Management ASANA Project
- Incident Management ASANA Project

Document Number:OSA-AU-HQ-WHS-POL-001Issued Date:29/03/2021Revision Number:1.0Page Number:24 / 27



Element 14: Management Review

Intent - To ensure the continuing suitability of the WHSMS and assess the adequacy and effectiveness of the management system in managing health and safety performance and meeting OSA's legal and other requirements.

Element 14: Management Review aims to ensure the WHSMS remains suitable, adequate and effective, the need for any change is evaluated and actions to improve the management system, its processes and resource needs are established.

The SLT shall carry out periodic reviews to evaluate the performance of the WHSMS, its continuing suitability, and make adjustments to build upon and improve its effectiveness. OSA workers and other interested parties shall be encouraged to participate in periodic reviews of the WHSMS and provide feedback on its performance.

The SLT shall be responsible for ensuring that management reviews are documented and recorded and outcomes of the review such as changes and improvements are communicated to workers and other stakeholders within 14 days of the review taking place.

The following management review information shall be documented and recorded:

- decisions, actions relating to potential changes to OSA's policies, procedures and objectives;
- information relating to revised risks and any proposed treatment and controls;
- improvement suggestions for inclusion into future management plans;
- resource commitments where appropriate;
- any other alternation, modification and improvement to the management system that demonstrates a commitment to continual improvement.

Annual management reviews shall include:

- an evaluation of the suitability of the WHS policy and other policies;
- a review of WHS objectives, targets and WHS performance indicators;
- findings of WHSMS audits;
- changes in activities and services of the organisation;
- impacts of changing legislation, equipment, procedures and personnel.

Element 14: Documentation

Management Review Template

Document Number: OSA-AU-HQ-WHS-POL-001 **Issued Date:** 29/03/2021 **Revision Number:** 1.0 **Page Number:** 25 / 27



Definitions

Term	Description
Audit	A systematic examination against defined criteria to determine whether activities and related results conform to planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve the organisation's policy and objectives.
Competent person	A person who has acquired through training, qualification, or experience, or a combination of these, the knowledge and skills, qualifying that person to perform a specific task.
Continual improvement	Process of enhancing the WHSMS to achieve improvements in overall WHS performances, in line with the organisation's WHS or WHS policy.
Control of hazards/risks	The term 'control of risks' is used, to mean the process of elimination or minimisation of risks.
Corrective Action	Refers to action taken after the event to correct any problem to ensure that repetition will not occur.
Hazard	A source or a situation with a potential for harm in terms of human injury or ill-health, damage to property, damage to the environment, or a combination of these.
Hazard identification	The process of recognizing that a hazard exists and defining its characteristics.
Hazard/risk assessment	The term 'risk assessment' is used to mean the overall process of estimating the magnitude of risk and deciding what actions will be taken.
Health surveillance	Monitoring of individuals for the purpose of identifying changes in health status that may be due to work exposure to a hazard.
Incident	Any unplanned event resulting in, or having a potential for injury, ill health, damage or other loss.
Interested parties or relevant stakeholders	Individual(s) or group(s) concerned with, or affected by the WHS performance of an organization.
PCBU	Person conducting a business or undertaking - whether the person conducts the business or undertaking alone or with others.
Preventative Action	Refers to proactive action that involves steps before problems occur.

Document Number: OSA-AU-HQ-WHS-POL-001

Revision Number: 1.0

Issued Date: 29/03/2021 **Page Number:** 26 / 27



Risk

(In relation to any potential injury or harm.) The likelihood and consequence of that injury or harm occurring.

Safety

A state in which the risk of harm (to persons) or damage is limited to an acceptable level.

Worker

A person is a worker if the person carries out work in any capacity for a person conducting a business or undertaking (PCBU), including work as:

- an employee; or
- a contractor or subcontractor; or
- an employee of a contractor or subcontractor; or
- an employee of a labour hire company who has been assigned to work in the person's business or undertaking; or
- an outworker; or
- an apprentice or trainee; or
- a student gaining work experience; or
- a volunteer; or
- a person of a prescribed class

The person conducting the business or undertaking is also a worker if the person is an individual who carries out work in that business or undertaking.

Document Number:OSA-AU-HQ-WHS-POL-001Issued Date:29/03/2021Revision Number:1.0Page Number:27 / 27