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1 Purpose

The purpose of this procedure is to specify in more detail the key principles of the Corporation's Safety Management System (SMS) that are referred to in the Safety Management System Corporate Policy.

2 Scope

This procedure covers all Work Health and Safety matters relating to the Corporation's responsibilities, including:

- i. All types of work and all levels of employees within the Corporation, all contractors who are engaged by the Corporation and all visitors to the Corporation.
- ii. Where applicable the provision of a safe environment to the public in the vicinity of the Corporation's assets and work areas.

Safety legislation requires safety to be a shared responsibility between the Person Conducting a Business Undertaking (PCBU) and the worker (as defined by the Act, which includes a contractor and their workers). Consequently, the scope of this Procedure extends to the Corporation's officers and all workers under its legislative responsibility.

3 Roles and Responsibilities

Role / Title	Responsibility	
Chief Executive Officer	 Shall ensure that: All personnel are aware of requirements of this procedure and its management in sites under Territory Generation control. Initiates procedure review as required. 	
All Managers/Site Coordinators	 Shall ensure that: This procedure is put in place at all Territory Generation controlled power stations sites. Personnel are advised and trained as necessary in the procedure to be followed. Contractors are informed of and follow the procedure, where applicable. Contribute to procedure reviews 	
Project Officers/Contract Managers	 Shall ensure that: Contractors under their control are informed of and follow the procedure, where applicable. Contribute to procedure reviews 	
All Personnel	 Shall ensure that: This procedure is followed personally and by contractors/visitors under their control, where applicable 	



	Contribute to procedure reviews	
WHS Specialist	 Facilitate the application of this procedure including but not limited to WHS field audits, documentation reviews, incident investigations, workplace inspections, risk and compliance management, management reporting and the provision of subject matter expert advice. 	
Technical Training Specialist	Facilitate relevant safety training	
Document Owner	 The position responsible for the preparation, review and accuracy of this document. 	
Document Sponsor	 The position responsible for the approval and use of this document 	

4 Definitions

Corporation	Means the Territory Generation Corporation, which is a Person Conducing a Business or Undertaking (PCBU) for the purpose of the legislation
GRACE	Means the IT system used to record and manage matters associated with governance, risk, audit, compliance and events within the Corporation.
Officer	Means a person as defined in Section 4 of the WHS (NUL) Act.
Safety	Means work health and safety
Safety Management Cycle	Means the set of specific safety related elements that together form logically connected steps in a cycle of safety related actions. The Safety Management Cycle is one component of the Safety Management System.
Safety Management System (SMS)	Means the collection of components that together provide a business system dedicated to the provision of good safety practices. Components include specific safety related elements (such as hazard management) and general safety related elements (such as IT systems and training courses).
Safety Management and Mitigation Plan	Means the specific document prepared by the Corporation for submission to the Utilities Commission for the purpose of meeting generation licensing obligations.
Safe work documents	Means the collection of documents that are designed for use by workers to assist in the assessment and safe conduct of job tasks. Includes safety procedures, work instructions, forms, templates etc.



Shall	Means a mandatory requirement
Should	Means an advisory requirement
WHS	Means Work, Health and Safety
Workers	Means employees, contractors and subcontractors, as specified in Section 7 of the WHS (National Uniform Legislation) Act

5 References

#	Document	Date
1	WHS (National Uniform Legislation) Act	2011
2	WHS (National Uniform Legislation) Regulations	2011
3	AS/NZS 4801 "OHS Management Systems – Specification"	2001
4	AS/NZS 4804 "OHS Management Systems – General guidelines"	2001
5	OHSAS 18001 "OHS Management Systems – Requirements"	2007
6	AS 5577 "Electricity Network Safety Management System"	2013
7	WHS-02 Safety Management System Procedure	2014

6 Records

This document shall be stored in Territory Generation's Records Management System (TRIM) in accordance with G-ADMIN-001 *Document Management Procedure*.

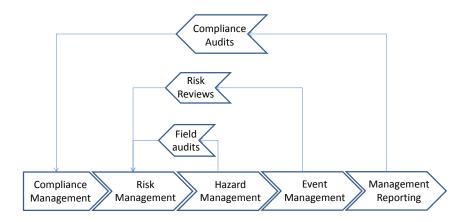
7 Principles

The main objective of this document is to provide for a balanced and consistent Safety Management System that secures the health and safety of workers and visitors, and the safety of the Corporation's assets and workplaces.

In accordance with this objective, the Corporation's Safety Management System is to be deployed using the following principles:

7.1 Safety Management Cycle

The Corporation shall implement the following Safety Management Cycle steps:





a) Compliance Management

- i. The compliance management process consists of identifying external WHS related obligations placed on the Corporation, assessing those obligations, assigning the obligations, monitoring the controls placed on each obligation, reporting on the status of controls and initiating audits to assess compliance with the obligations.
- ii. WHS compliance obligations shall be identified, recorded and managed in the GRACE system.

b) Risk Management

- i. The risk management process consists of identifying, assessing and controlling WHS risk to the Corporation at a strategic and operational level and includes the use of:
 - A Corporate level WHS strategic risk register shall be developed and maintained covering strategic risks such as reputational, financial liability etc.
 - An Operational level WHS risk register shall be developed and maintained covering all workers, visitor and where applicable, public safety.
- ii. All risk registers shall cover risk identification, analysis, evaluation and controls including assessment of the residual risk after the controls have been applied, and further risk mitigation actions if the residual risk is unacceptable.
- iii. Risk registers are to be prepared and maintained by employees who are trained in the risk management process with input from key stakeholders
- iv. All risk registers shall be recorded and maintained in the GRACE system.
- v. Further requirements on managing WHS risks are to be in accordance with G-OHS-57 Risk Management Procedure

c) Hazard Management

- i. The hazard management process consists of identification, assessment and control of hazards at the operational level and includes the use of:
 - WHS operational risk registers
 - Task based risk assessment (Job Safety Environmental Analysis {JSEA} or equivalent)
 - Operational task risk assessment, where applicable
 - Project risk assessment including the use of safety management plans and safe work method statements for high risk construction work activities
- ii. Hazard identification and recording is to be applied prior to commencing work of any kind as well as reassessed throughout the job process where necessary.
- iii. No work is to commence until the required hazard identification and recording steps have been completed.
- iv. No work is to continue if an unassessed hazard appears until that hazard is assessed, recorded and controls have been put in place.



v. Further requirements on managing hazards are to be in accordance with G-OHS-57 Risk Management Procedure and G-OHS-11 JSEA Process Work Instruction

d) Event Management

- i. The event management process consists of event identification, recording and management using the GRACE system. Events to be reported and managed in this system include:
 - Access Authority breach
 - Injury/illness
 - Near hit
 - Hazard
 - Improvement
 - Environmental
 - Loss
 - Minor injury
 - Motor Vehicle Accident (MVA)
 - Product or service failure
 - Property/equipment damage
 - Security
 - Waste water
 - Water quality
- ii. Where appropriate event management may also be recorded and managed via other systems such as the MAXIMO asset management system.
- i. Further requirements on recording and managing events are to be in accordance with G-OHS-56 *Incident Reporting and Investigation Procedure.*

e) Management Reporting

- ii. The management reporting process consists of regularly providing reports on the status of the Safety Management System to the CEO, senior management and the Board.
- iii. Reports are to contain information on reporting against agreed WHS measurement objectives and targets as well as matters that relate to Safety Management System conformance or its enhancement as identified from incident assessments, reviews and audits.
- iv. WHS Measurement objectives and targets shall be formed for the assessment of health and safety performance. This includes, but is not limited to, the following measures:
 - Lost time injuries
 - Lost time incident frequency rate
 - Near hits
 - Severity rate
 - Safe Act Observations.

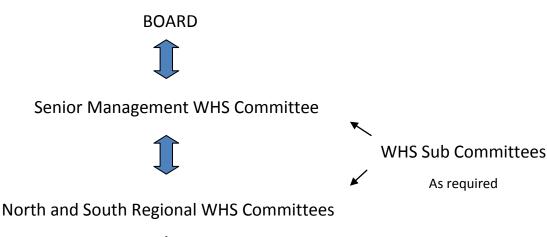


- v. Matters that relate to Safety Management System conformance or its enhancement may be identified through incident assessment, field audit, risk review, compliance audit, and safety projects.
- vi. The Senior Management WHS Committee shall assess and, where considered appropriate, action all recommendations relating to the Corporate Safety Management System conformance or its enhancement.
- vii. WHS written reports on measurable objectives, targets and arising recommendations/actions shall be presented to the Board on a monthly basis.
- viii. WHS Summary Reports shall be made at weekly Corporation Management meetings
- ix. Further requirements on management reporting are to be in accordance with G-OHS-58 Performance Monitoring, Objectives and Targets Procedure
- f) Field audits/Site inspection/Risk review/Compliance audits
 - i. The field audits process consists of conducting audits of real-time work practices associated with scheduled work
 - ii. The site inspection process consists of conducting site inspections at all Territory Generation controlled sites on a regular basis
 - iii. The risk review process consists of initiating reviews to assess the ongoing relevant of the risks and their controls in all risk registers.
 - iv. The compliance audit process consists of initiating audits to assess compliance with:
 - External obligations
 - The Safety Management System Policy, Procedure and WHS operational procedures/work instructions
 - The effectiveness and appropriateness of the Safety Management System
 - The Safety Management and Mitigation Plan (SMMP) required by the Utilities Commission
 - v. A program of field audits/site inspections shall be established and performed monthly by WHS Specialists and WHS Consultant roles
 - vi. Corporate and Operational WHS Risk Registers shall be reviewed and updated on an annual basis, in the event of a significant incident occurring and when otherwise identified as required by the WHS Specialist and Risk, Quality and Environment Specialist roles as appropriate
 - vii. Compliance audits shall be conducted by an external party as per an independent Audit Work Plan instigated by the CEO and approved by the Board.
 - viii. A review of the Safety Management and Mitigation Plan shall be performed annually by the Commercial Manager
 - ix. The findings and recommendations arising from field audits/site inspections, risk reviews and compliance audits shall be reported to the CEO, Executive Management and other key stakeholders, where appropriate.
 - x. Further requirements are to be in accordance with *G-OHS-58 Performance Monitoring, Objectives and Targets Procedure*



7.2 Formal WHS Committee Structure

The Corporation shall implement the following formal WHS structure:





WHS Representatives



Workers

- a) The following formal WHS committee structure shall steer, monitor, resolve and report on safety issues
 - i. Senior Management WHS Committee

Membership:

- CEO as chair
- WHS Specialist as Secretary
- Other senior managers as required by the chair.

Meetings are to be held monthly, except when urgent safety matters need attention, in which case the meetings will be held as required.

ii. Regional (North and South) WHS Committees

Membership:

- Manager Generation North/South
- Site Management representatives
- Site Worker representatives of all work streams
- Health and Safety Representatives (HSR's)

Meetings are to be held monthly, except when urgent safety matters need attention, in which case the meetings will be held as required.



The purpose, objective, conduct and membership of each Committee is to be in accordance with *G-OHS-55 Work Health and Safety Committee Procedure*

- iii. Other additional subcommittees reporting to either the Senior Management WHS Committee or regional WHS Committees may be established as required to address specific issues or projects.
 - These subcommittees shall be given a clear Terms of Reference and shall report all outcomes to the relevant Senior Management WHS Committee or regional WHS Committee on a monthly basis.
- b) The Senior WHS Committee shall report (monthly by exception and half yearly in full) to the Board on the status of safety management issues.
- Further requirements on WHS Committees and the consultative process shall be in accordance with G-OHS-55 Work Health and Safety Committees Procedure and G-OHS-54 WHS Communication and Consultation Procedure

7.3 IT Database(s)

- a) The Safety Management System shall be supported by an IT database that records <u>Safety Management information</u> (such as external obligations placed on the Corporation, risk management information, event initiated safety information, safety performance data and the outcomes of audits, reviews and inspections
 - The current IT system used by the Corporation to achieve the above is the GRACE system for risk, compliance, action and event management.
 - Access to GRACE shall be available to all employees to enable, at least, their view of the WHS legislative obligations imposed on their business unit, the risk assessment and risk treatment information for those obligations, and the opportunity to enter WHS events.
- b) The Safety Management System shall be supported by an IT database that records training information for all workers who (a) undertakes a safety related training course and (b) receives accreditation for any training course.
 - The current IT systems used by the Corporation to achieve the above is a combination of systems interfacing through middleware and are as follows:
 - Training Management System (TMS) for the management of employee training records & expiry dates
 - Authorisations Database for the management of employee & Contractors Access to Apparatus Records

Rapid Induct
Records
OTAS
e3Learning
Online Learning Delivery Portal

- SURPASS System for the management of electronic Access to Apparatus (Permit to Work)
- Honeywell System for the management of site security access (Swipe card access system)



7.4 Safety Training

- Relevant and appropriate safety training shall be provided as part of the Safety Management System
- b) The Technical Training Specialist role shall facilitate the following:
 - Safety training for the induction of new employees and the Corporation's appointed contractors, in accordance with site requirements,
 - Safety refresher training for employees and the Corporation's appointed contractors, as required
 - Safety training of managers and workers on specific topics as required
- Safety related training records shall be maintained in the relevant IT database for all workers and where applicable contractors

7.5 Documentation

- a) The Safety Management System shall be supported by adequate documentation.
- b) The presentation of the documentation at the corporate level is to be consistent with G-ADMIN-001 Document Management Procedure which is consistent with the International Standards Organisation quality documentation structure, being policy, procedure, work instructions and guidelines.
- Employees and Contractors shall be made aware of documentation through induction processes
- d) Documentation shall be readily available to employees via the Corporation intranet.
- e) The document hierarchy that to be used to support the Safety Management System is as follows:
- Safety Management System Policy
- Safety Management System Procedure
- Safe Work Documents WHS Operational Procedures and Work Instructions
- Safe Work Documents WHS registers/forms/templates/checklists etc.





7.6 Application

- a) The Safety Management System shall extend to contractors (and their employees) who are engaged by the Corporation.
- b) The Corporation shall ensure that the management of a subcontractor or service provider is supported by a process for selecting and approving the subcontractor or service provider to undertake work for the Corporation.
- c) Where the Corporation engages a contractor whose safety management system meets the Corporation's Safety Management System standards, the Corporation may accept that safety management system, but must inform the contractor of the key requirements of the Corporation's Safety Management System.
- d) Where the Corporation engages a contractor whose safety management system does not meet the Corporation's Safety Management System standards, the Corporation is to ensure that the contractor (and its employees) agree to adopt the Corporation's Safety Management System, including undertaking the necessary training suitable to that engagement.
- e) The Corporation is to provide reasonable assistance to the contractor (and its employees) to allow their participation in the Corporation's Safety Management System, should the contractor elect this option.

7.7 SMS Review

- a) The Safety Management System shall be reviewed and refreshed (as a result of that review) every 5 years at the latest or when other changes are identified as required.
- b) The review is to be instigated by the Chief Executive Officer.
- c) The 5 yearly reviews shall be conducted by an independent third party and any changes shall be approved by the Board.