

INTEGRATED MANAGEMENT SYSTEM

HEALTH, SAFETY, QUALITY AND ENVIRONMENTAL

COPY 1/1



Approved:

Paul Gynell

General Manager John Bedwell Management Pty Ltd August 2020

My M



Version 3.1	
August 2020	



Review and Amendment History

Detailed description of changes is within the Company Index Register (JBM-R-01).

Version	Change / Amendment	By Whom	Date
V2.1	Restructure IMS, incorporating EMS, QMS, OHS into integrated plan	HSQET Coordinator	February 2015
V2.2	Further Restructure to met FSC Requirements	HSQET Coordinator	March 2015
V2.2	Nil Required	HSQET Coordinator	April 2015
V2.2	Nil Required	HSQET Coordinator	May 2015
V2.2	Nil Required	HSQET Coordinator	June 2015
V2.3	Amendments to references within the manual to sync with the PMP template version	HSQET Coordinator	July 2015
V2.4	Add Excavations / Plumbing and Working at Heights	HSQET Coordinator	August 2015
V2.5 Amended Company Organisational Chart, Reviewed entire document Amended references to manufacturers and Australian standard		HSQET Coordinator	October 2016
		HSQET Coordinator	May 2017
V2.7	Amended audit & inspection wording	HSQET Coordinator	Oct 2017
V2.8	Reviewed	HSQET Coordinator	Oct 2018
V2.9	Reviewed no change	HSQET Coordinator	Oct 2019
V3.0	Changes to Company policies dates. Changes to the PMP review frequency Include AS/NZS 1892 to WAH. Changes to project/company emergency plan frequency.	HSQET Coordinator	Dec 2019

Integrated Management System		Uncontrolled When Printed	Issue Date: August 2020
(IMS)			_
JBM-M-01	Version 3.1		Page 2 Of 78



V3.1	Admended issue dates & footer & header	OSH Admin	Aug 2020

Distribution List

Issue	Сору	Date	Name	Position and Phone	Date Given
2.4	1/1	August 15	JBM Office	Electronic Copy – Hard Copy	All Staff have access
2.5	1/1	October 16	JBM Office	Electronic Copy – Hard Copy	All staff have access
2.6	1/1	May 2017	JBM Office	Electronic copy – hard Copy	All staff have access
2.7	1/1	Oct 2017	JBM Office	Electronic copy – hard Copy	All staff have access
2.8	1/1	Oct 2018	JBM Office	Electronic copy – hard Copy	All staff have access
2.9	1./1	Oct 2019	JBM Office	Electronic copy – hard Copy	All staff have access

	anagement System	Uncontrolled When Printed	Issue Date: August 2020
(IMS)			
JBM-M-01	Version 3.1		Page 3 Of 78



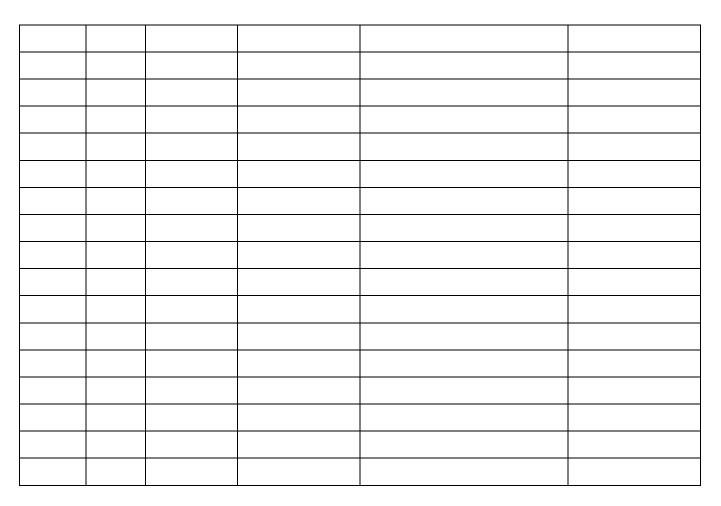


Table of Contents

1 Introduction	9
1.1 Abbreviations	9
1.2 Reference Key	9
1.3 Terminology	10
2 Integrated System Manual	10
2.1 System Elements	10
2.2 System Exclusions 2.3 Design Risk Assessments	11
2.3 Design Risk Assessments	11
3 Certification	12
3.1 AS/NZS 4801 OHS Management System Certificate	12
4 Policy's	13
4.1 Work Health and Safety Policy	14

Integrated Ma	anagement System	Uncontrolled When Printed	Issue Date: August 2020
	Version 3.1		Page 4 Of 78



4.2 Quality Policy	
4.3 Environmental Policy	
4.4 Resolution / Bullying Policy	
4.5 Drugs and Alcohol Policy	18
5 Legislative Requirements	19
5.1 Monitoring Legislative Requirements	19
6 Objective and Targets	19
6.1 Establishing and Achieving Objectives and Targ	ets20
6.2 Reviewing Objective Targets	
	nrough: 20
6.2.2 Project Objective and Targets thro	ugh: 20
6.1 Current Company IMS Objective and Targets	
7 Company Organisational Chart	23
7.1 Definitions of Roles	23
7.2 Management Commitment	24
7.3 Infrastructure	25
7.4 Management Representative	
7.5 Organisational Responsibility and Authority	
8 Roles and Responsibilities	26
8.1 Employees and Subcontractors	27
8.2 Visitors 27	
8.3 Dismissal of Employment or Agreement	
8.3.1 Instant Dismissal	28
9 Training	28
9.1 Company Inductions	29
9.2 Site Specific Induction Training	29
9.3 Visitors Inductions	
9.4 Qualifications and Training Needs Analysis (TN	
9.5 Plant and Equipment Training	
9.6 Small Plant and Equipment	
9.7 Skills Assessments	
9.8 External Training	32
10 Communication	
10.1 Toolbox Meetings and Daily Briefs	
10.1 Lesson Learnt Alerts	
10.2 On-Site Communication	
10.3 External Communication	
10.4 Communication with Subcontractors	



	10.5 Community Liaison	34
	10.6 Complaints	34
	10.7 Consultation and Participation	
	10.8 Conflict / Bullying Resolution Process	35
11 F	Project Management	36
126	Subcontractor Management	37
12	Subcontractor Management	31
	12.1 Selecting and Engaging Subcontractors	37
	12.2 Managing Subcontractors Onsite	
	12.3 Subcontracting To Principal Contractor	
	12.4 Project Operational Control	39
13 F	Risk Management	39
	40.4 Harrard Island Grant / Assessment of District	00
	13.1 Hazard Identification / Assessment of Risks	39
	13.2 Risk 41 13.2.1 Likelihood	11
	13.3 Consequences	
	13.3.1 Consequence Table	
	13.4 Risk Matrix	
	13.5 Risk Control	
	13.6 Monitoring	
14 F	Hazard Reporting	45
	14.1 Company Pick Pogistor	15
	14.1 Company Risk Register	
	14.3 Job Safety Environmental (JSEA) / Safe Work Method Statement (SWMS)	
	14.4 Risk Assessment Reviews (JSEA, SWMS, PRA)	
	14.5 Design Risk Assessments	
	14.6 Mobile Plant Risk Assessments	
	14.7 Safe Operating Procedures	
15 E	Environmental Incident Management	48
16 <i>A</i>	Accident / Incident Management	49
	16.1 Notifiable Incidents	49
17 I	njury and Incident Investigation	50
	17.1 Critical Incident	
	17.2 Critical Incident Process / Investigation	
	17.3 Return To Work	52

Integrated Ma (IMS)	nagement System	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 6 Of 78



I8 Health Surveillance		
19 Document and Data Control	53	
19.1 Document Approval	54	
19.2 Document Review, Update (Amendments) and F		
19.3 Amendments issued		
19.4 Identifying Changes and Current Revision Status		
19.5 Document Issue		
19.6 Obsolete Documents	55	
19.7 External Origin Documents	55	
20 Control of Records	56	
20.1 Access to Records	56	
20.2 Back-up Electronic Files	56	
20.3 Archive Records	56	
21 Preventative Action and Corrective Actions	57	
21.1 Preventative Actions		
21.2 Non Conformance's and Corrective Actions	57	
21.3 Continual Improvement	58	
21.4 Monitoring and Review	58	
22 Purchasing	58	
22.1 Supplier Review	59	
22.2 Control of Process Changes	59	
22.1 Production Control/Service Provision		
22.2 Product Validation / Testing / Calibration		
22.3 Product Preservation	60	
23 Inspection and Testing:	60	
23.1 Receiving Inspections of Incoming Goods		
23.2 In-Process Inspection		
23.3 Final inspection	61	

Integrated Management System (IMS)		anagement System	Uncontrolled When Printed	Issue Date: August 2020
	JBM-M-01	Version 3.1		Page 7 Of 78



24 Plant and Equipment	61
25 Electrical Equipment	63
26 Working with Asbestos	63
27 Working at Heights	63
28 Excavations / Permits	65
29 Work Instructions and Safe Operating Procedures (SOP)	65
30 Traffic Management Plan	66
30.1 Pedestrian and Vehicle Movement Plan	66
31 Hazardous Substances and Dangerous Goods	66
32 Environmental Protection Requirements / Identification of Environmental	Aspects 67
32.1 Identifying Impacts	
32.2 Significant Environmental Aspects	
33 Audits and Inspections	68
33.1 Site Audits	69
33.2 Site Inspections	
33.3 External Audits	
33.4 Audit Results	
33.5 HSQE System Reporting	71
34 Management Review	71
34.1 General Meetings	72
34.2 Business Improvement	
35 Emergency Response Procedures	72
35.1 Company Office / Workshop Emergency Plan	73
35.2 Project / Site Emergency Plans	73
35.3 Emergency Equipment	73
35.4 General Emergency Response Chart	76

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 8 Of 78



36 Appendix A – Company Index Register	76
37 Appendix B Company Waste Management Plan	76
38 Appendix C Asbestos Register	78

1 Introduction

John Bedwell Management Pty Ltd is a building company established over 35 years ago by John Bedwell serving the Nhulunbuy area.

Our services include but not limited to:

- General Building works,
- Repairs and Maintenance works,
- Painting works,
- Plumbing works,
- Carpentry works.

As the nature of our works can change, so do our practices, we strive to ensure a safe-environmentally friendly work place for all staff, contractors and visitors.

1.1 Abbreviations

- JBM John Bedwell Management Pty Ltd,
- HSQE Health, Safety, Quality and Environmental,
- HSQET Health, Safety, Quality, Environmental and Training,
- JSEA Job Safety Environmental Analysis,
- PRA Project Risk Assessment,
- DRA Design Risk Assessment,
- MPRA Mobile Plant Risk Assessment,
- HSRA Hazardous Substance Risk Assessment,
- EMP Emergency Plan,
- WI Work Instructions, and,
- M Manual Number References.

1.2 Reference Key

Reference to key documents, manuals, and registers are located within the relevant section of this document. The colour key is:

Refers to applicable Documents,

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 9 Of 78



- Refers To applicable additional Manuals,
- Refers to applicable additional Registers.

1.3 Terminology

The terminology used throughout this manual is consistent with the definitions provided in the AS/NZS ISO 9001: 2008, AS/NZS AS 4801: 2001 and AS/NZS ISO 14001: 2004 International and Australian Standards.

- Supplier is used for contract manufacturer, subcontractor and direct material or service supplier.
- John Bedwell Management refers to John Bedwell Management Pty Ltd,
- **Subcontractor** refers to a company or person who conducts activities on behalf of John Bedwell Management,
- Product may also be used to mean services provided,
- **Hazard** is the source or situation with the potential for harm in terms of human injury, ill health, damage to property, damage to the environment, or a combination of these,
- **Risk** is the likelihood and consequence of a hazard causing injury or harm.

2 Integrated System Manual

This Manual describes the Integrated management system, incorporating the Health, Safety, Quality and Environmental management system of John Bedwell Management Pty Ltd, developed in conjunction with the Australian and International Standards Quality AS/NZS ISO 9001, OHS AS/NZS AS 4801 and Environmental AS/NZS ISO 14001.

The purpose of the integrated management system is to ensure a safe place of work, delivery of quality products and services to. To minimise our environmental footprint through conducting our products, processes and services in an environmentally responsible and protective manner.

2.1 System Elements

Attachments associated with this manual include but not limited to registers, forms, and training and induction manuals. The documentation can be found either in hard copy format at the head office or as documents recorded on the company electronic system.

Company related documents, work instructions, plans, and other required documents are recorded within the company IMS system index and amendment register (*JBM-R-01*).

The IMS integrated system consists of, but not limited to the following associated elements:

Manuals:

- JBM-M-01 IMS System Manual,
- JBM-M-02 Project Management Plan,
- JBM-M-03 Emergency Response Plan and Evacuation Map,
- JBM-M-04 Company Induction Manual, (based on this manual),
- JBM-M-05 Management Work Instructions Manual,
- JBM-M-06 Administration Instructions,

Integrated Management System (IMS)	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01 Version 3.1		Page 10 Of 78



JBM-M-07 Site General Safe Operating Procedures.

Polices:

- JBM-P-01 Work Health and Safety,
- JBM-P-02 Environmental,
- JBM-P-03 Quality,
- JBM-P-04 Drugs and Alcohol, and,
- JBM-P-05 Resolution / Bullying Policy.

Risk Assessments:

- JBM-F-01 Project Risk Assessment,
- JBM-F-02 Job Safety Risk Assessments,
- JBM-F-03 Hazardous Substance Risk Assessment,
- JBM-F-04 Mobile Plant Risk Assessment, and,
- JBM-F-05 Design Risk Assessment.

The above reference is to template documents, detailed information concerning populated documents is within the Company System Index Register (*JBM-R-01*).

2.2 System Exclusions

Exclusion of 7.3 Design from the International Standard AS/NZS ISO 9001 Quality management system is excluded from the management system.

The design aspect is outsourced as the company only constructs all projects as per the specifications, according to the plans provided, which is part of our contractual obligations.

2.3 Design Risk Assessments

Designs for our projects are conducted through qualified designers or have been designed by the client prior to the construction phase with a risk assessment conducted by the client for design buildability hazards.

Further guidance in conducting Design Risk Assessments is detailed with our General Work Instructions Manual.

If no design risk assessment is provided by the client, John Bedwell Management will conduct an internal design risk assessment, in accordance with our HIRAC process for any buildabilty hazards / risks with continual review where required throughout the project life.

Minimum training required for conducting this assessment is detailed within the company training register.

- ❖ JBM-F-05 Design Risk Assessment, JBM-F-37 Request For Information.
- ♦ JBM-M-05 Management Work Instructions Manual (05) Design Risk Assessments
- ❖ JBM-R-09 TNA / Training Register

Integrated Management System (IMS)	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01 Version 3.1		Page 11 Of 78



3 Certification

3.1 AS/NZS 4801 OHS Management System Certificate



The Federal Safety Commissioner certifies that

John Bedwell Management Pty Ltd

having met the requirements of the Australian Government building and construction WHS Accreditation Scheme, is hereby awarded accreditation from 14 September 2018 until 13 September 2024.

Grant Lovelock

Federal Safety Commissioner



Accreditation number: 445

Integrated Management System		Uncontrolled When Printed	Issue Date: August 2020
(IMS)			
JBM-M-01	Version 3.1		Page 12 Of 78



4 Policy's

John Bedwell Management policy's are displayed at the Company Head Office / Workshop, due to no specific onsite administration building required onsite.

The Policy's are also explained prior to employment with the company through the company and site induction process.

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 13 Of 78

4.1 Work Health and Safety Policy



Work Health and Safety Policy

John Bedwell Management Pty Ltd embraces a safety culture that will provide and maintain a working environment, that is safe and without risk to health and safety of the employees at the workplace. To ensure that the health and safety of any other person is not adversely affected as a result of the construction and maintenance work in which the employer or employee are engaged in.

We are committed to ensuring a safe place of work for all employees, visitor's and contractors, in accordance with Work Health and Safety Northern Territory Act and Regulations, AS/NZS 4801, applicable legislative or other requirements. John Bedwell Management Pty Ltd is committed to:

- Ensuring that all employees work in a safe workplace as well as a stimulating and rewarding environment,
- Establish measurable safety performance objectives and targets that are reviewed in order to continuously improve our WHS performance, including regular workplace inspections during projects and the prompt control of identified hazards,
- Provide adequate resources for training and further system improvements,
- Adopt systems and procedures that prevent incidents, accidents and near misses that could endanger the health and well being of employees,
- Regularly review the organisations performance in workplace health and safety principals and identify opportunities for improvement,
- Defining areas of responsibility.

All personnel working on behalf, or entering our sites are required to comply with this policy. This policy is communicated at all levels of our organisation and is available to the public.

This policy will be reviewed annually.

Paul Gynell General Manager John Bedwell Management Pty Ltd

Integrated Manage (IMS)	ment System	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01 Ver	sion 3.1		Page 14 Of 78

4.2 Quality Policy



Quality Policy

John Bedwell Management Pty Ltd vision is to be recognised throughout the East Arnhem Land community for delivering quality and value. We believe that market leadership is based primarily on performance and reputation, and we aim to be:

- A professional, remote based construction and maintenance company committed to exceptional client service
- A firm committed to long-term growth based on a solid foundation of outstanding and loyal people
 using contemporary business, management and construction systems.

John Bedwell Management is a dedicated team of professionals who are committed to:

- Giving excellent, professional service to our clients,
- Maintaining high ethical and business standards,
- Developing the professional and technical training skills of our staff so that our clients are assured of the most up-to-date "best practice" construction service with innovative approaches,
- Helping our clients to clearly understand the construction process,
- Compliance with all relevant legislative and regulatory requirements,
- Meet our contractual obligations with a view to achieving client satisfaction, reputation enhancement and repeat business through the effective application, maintenance of our management system in accordance with AS/NZS ISO 9001.
- · Establish and continually review our objective and targets for suitability,
- Investigate all complaints issues raised,
- Ensure that employees and sub-contractors are trained, skilled, competent, licensed and certified as appropriate for the tasks they are performing,
- Ensure that staff is kept abreast of changes in relevant standards, legislation and industry developments.
- Develop systems to ensure that our equipment is appropriately calibrated all customer property is securely stored.

All personnel working on behalf, or entering our sites are required to comply with this policy. This policy is communicated at all levels of our organisation and is available to the public.

This policy will be reviewed annually.

Paul Gynell

General Manager John Bedwell Management Pty Ltd October 2019

Integrated Ma (IMS)	nagement System	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 15 Of 78



4.3 Environmental Policy



Environmental Policy

John Bedwell Management Pty Ltd recognises its role in establishing and maintaining effective environmental management principles in all aspects of its operations. We are committed to reducing our environmental footprint, in accordance with AS/NZS ISO 14001, relevant legislation or guidelines through:

- Ensuring that all employees, subcontractors, and visitors are provided guidance, training and instruction in our environmental management system, compliance requirements,
- Continually review and monitor our environmental aspects, impacts and objectives and targets,
- Develop methods for the reduction of pollution and waste,
- Ensure all mechanical equipment is serviced regularly to ensure optimal efficiency to minimize fuel wastage and to reduce environmental pollution.

All personnel working on behalf, or entering our sites are required to comply with this policy.

This policy is communicated at all levels of our organisation and is available to the public.

This policy will be reviewed annually.

Paul Gynell General Manager

John Bedwell Management Pty Ltd

Integra (IMS)	ted Ma	nagement System	Uncontrolled When Printed	Issue Date: August 2020
JBM-N	l-01	Version 3.1		Page 16 Of 78



4.4 Resolution / Bullying Policy



Resolution / Anti Bullying Policy

John Bedwell Management Pty Ltd is committed to providing all employees with a healthy and safe work environment free from workplace bully or conflicts.

All employees are to behave in a professional manner and to treat each other with dignity and respect when they are at work.

John Bedwell Management is committed to the prevention of workplace bullying and conflicts through:

- Investigate any bully, discrimination or conflict issue that may be raised, if there is no simple solution.
- Notifying all personnel of any identified issue, through onsite communications,
- Provide mediation from outside parties, if the issue can not be resolved within the company,
- Consult with employees, contractors when making decisions about resolving, monitoring, elimination and management of system problems,
- Provide training, guidance information to assist with the prevention of discrimination, and bullying in the workplace.

All personnel working on behalf, or entering our sites are required to comply with this policy. This policy is communicated at all levels of our organisation and is available to the public.

This policy will be reviewed annually.

Paul Gynell

General Manager John Bedwell Management Pty Ltd

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 17 Of 78



4.5 Drugs and Alcohol Policy



Drugs and Alcohol Policy

John Bedwell Management Pty Ltd has a zero tolerance to any personnel working for or on behalf, including visitors of being onsite while under the influence of drugs or alcohol.

Everybody at John Bedwell Management Pty Ltd is expected to behave in a responsible manner, be in a fit and healthy state for the workday.

We are committed to providing a safe working environment by eliminating conditions and work practices that could lead to illness or personal injury and equipment or other property damage, achieved this through:

- Comply with the N.T workplace health and safety acts and regulations duty of care to providing a safe working environment,
- Provide assistance through a range of preventative initiatives including conducting random drugalcohol testing, self testing and educational and rehabilitative measures to help overcome employees' alcohol/drugs and other related problems,
- Ensure employees who are unfit for work or who are deemed unfit for work as a result of alcohol or
 other drug use are dealt with consistently and fairly in accordance with this policy,
- Any unfit person at work will be immediately stood down,
- Ensure confidentiality of any information obtained.

Personnel are required to:

- Not work whilst under the influence of alcohol or illegal drugs,
- Attend all testing for drugs and alcohol when required,
- Notify John Bedwell Management if they on any prescribed medication that may induce drowsiness, or states not fit to operate equipment, prior to commencing work.

All personnel working on behalf, or entering our sites are required to comply with this policy. This policy is communicated at all levels of our organisation and is available to the public.

This policy will be reviewed annually.

Paul Gynell

General Manager John Bedwell Management Pty Ltd

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 18 Of 78



5 Legislative Requirements

John Bedwell Management will comply with the following as applicable to ensure our compliance with our contractual obligations and Health, Safety, Quality and Environmental Responsibilities.

The company legislative register has a complete list of current-relevant legislative requirements and legal obligations required for operating within the Northern Territory. For project site these will be identified via the scope of works, and listed within the Project Management Plan.

5.1 Monitoring Legislative Requirements

The HSQET Coordinator is responsibility is to ensure that all personnel within John Bedwell Management are aware of their legislative obligations and the need for compliance with these.

To assist in this process, the HSQET Coordinator retains a library of relevant Quality, Health, Safety and Environmental-related legislation, Australian Standards, Regulations, Codes of Practice and relevant guidance documentation from appropriate authorities.

To ensure the currency of the documentation, the HSQET Coordinator conducts quarterly checks as a minimum through regularly visiting relevant websites, work health authority alerts and or other mediums, recorded within either the company legislative register, or specific site legislative register.

If changes do occur concerning legislative requirements, the company will conduct an internal system review for the area, to ensure that all policies and procedures are accurate.

All personnel are made aware of the availability of the legislative, codes of practice and standards, and the need to retain a clear understanding of their obligations. This is communicated through but not limited to; daily briefing meetings, toolbox talks, lessons learnt, notice boards notices, verbal discussions and emails.

Documents that are out of date are either archived or destroyed and replaced with the current version. When required, the company seeks expert advice in Quality, Health, Safety and Environmental areas using the services of external specialists to ensure the highest level of expertise and currency is maintained.

- JBM-M-05 Management Work Instructions (04) Legislative Requirements
- **♦ JBM-R-04 Company Legislative Register.**

6 Objective and Targets

John Bedwell Management establishes, implements and maintains their Health, Safety, Quality and Environmental objectives and targets.

Key Company objectives are to:

- Promote the company in a positive effective manner,
- Deliver valued services and improved outcomes to issues that will maintain or improve the viability of the company in a competitive industry,

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01 Vers	ion 3.1		Page 19 Of 78



- Continually improve processes and systems to ensure a high quality product, a safe place of work and that our environmental footprint is minimised, and,
- Encourage and provide awareness and training to develop a highly skilled, environmentally and safety conscious workforce.

6.1 Establishing and Achieving Objectives and Targets

The Company Director / General Manager and appropriate Managers:

- Establish company-project objectives and targets, which are consistent with the Health, Safety, Quality, and Environmental Policies,
- Ensure that the objectives and targets comply with the relevant Legislation, Australian / International Standards, for the company and projects,
- Ensure that the objectives and targets are measurable and take into consideration operational areas, financial and business requirements and key stakeholders,
- Ensure that the objectives and targets have relevant staff members at appropriate levels within
 the company as allocated, with the specific responsibility of achieving the objectives within a
 specific timeframe allocated to achieve the target.

6.2 Reviewing Objective Targets

The HSQET Coordinator is responsible for ensuring that our company and project objective and targets are being achieved. This is conducted for:

6.2.1 Company Objective and Targets through:

- Organising management meetings to review objective and targets.
- Re establishing or changing objective or targets when required.

6.2.2 Project Objective and Targets through:

- Organising management meetings to review objective and targets,
- Re establishing or changing objective or targets when required.
- Establishing or changing objective or targets when required.

Management meetings are conducted on a monthly basis using the monthly meeting agenda (JBM-F-27B).

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 20 Of 78



Objective	Target	Performance Indicators	Time Frame	Person Responsible
Inductions completed	100%	Company induction completed forms within employee register	Ongoing	Managers
Reduction of Incidents / accidents	<10%	Reduction of incident/accident reports	12 months	All Personnel
Completion of Daily briefings	100%	Daily briefing forms completed	Ongoing	Supervisors / Managers
Nonconformances closed investigated and closed out in a timely fashion	100%	Nonconformances recorded within the non-conformance register, investigated and closed	>4 weeks where applicable to investigate, verify and close out nonconformance	HSQET Coordinator
Completion of Work Order – Site Prestart Check	100	Invoices issued, new hazards recorded with site PRA,	Immediately as practicable possible	HSQET Coordinator

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 21 Of 78



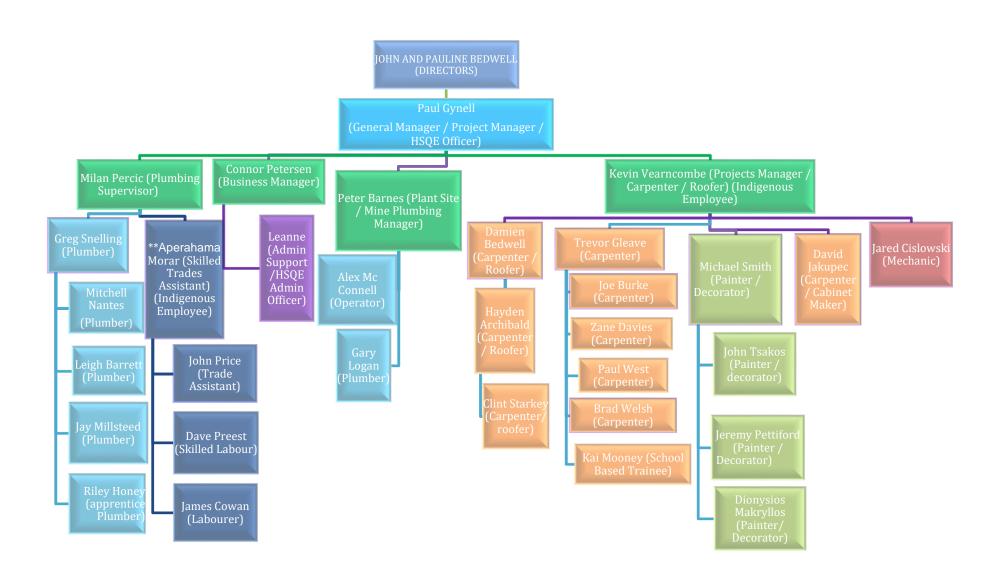


Specific JSEA, company risk	Supervisors /
register	Managers, Staff

6.1 Current Company IMS Objective and Targets

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 22 Of 78

7 Company Organisational Chart



7.1 Definitions of Roles

Currently the General Manager and Capital Works Manager act in dual roles, to which they are also the Project Managers, on the relevant sites that they manage.

Identification of Project Manager throughout this Manual is referring to the General Manager, Capital Works Manager on the relevant projects.

If appointment of a defined Project Manager is required, the IMS system will be reviewed, amended to suit.

7.2 Management Commitment

John Bedwell Management Pty Ltd has long known the importance of fostering and maintaining relationships with its employees.

Our approach to proactive employee relations has centered on:

- Mutual respect
- Providing a safe, stimulating & rewarding work environment
- Active engagement and involvement
- Experience and loyalty
- Willingness to retrain
- Continuous improvement

As a result of the long term commitment by our company of working together with its employees of our current workforce of 27 persons:

- 6 employees have been with us for 10 years or longer
- 5 for 5 years or longer
- 4 for 2 years or longer

The knowledge our workforce has gained and imparts during their day-to-day duties is integral to our company's long-term growth and success, and is a record our company is proud of.

With assistance from relevant areas within the company, the Company Director / General Manager establish organisational goals and expectations for the HSQE system framework and company policies.

The Company Director / General Manager are committed to ensuring the appropriate resources are available to achieve all goals and expectations that include, but are not limited to, human resources, financial resources, training, new technology and the use of specialists, if required.



The management team participates in a 12 monthly at a minimum review of the IMS system, incorporating; strengths, opportunities for improvement, trends, objectives and targets and need for change based on any new business directions.

Further reviews of the IMS system and procedures is conducted when any significant incident/accident has occurred or major non-conformance has been raised, to ensure that the current policy's, procedures are effective.



These meetings are conducted in various forums including toolbox meetings and general meetings.

The management team can consists of the Company Director, General Manager, Project Manager, Business Manager, HSQET Coordinator, and other relevant staff where applicable, who are responsible for:

- Providing leadership and communication to the organisations employees, subcontractors and visitors,
- Conducting regular site inspections,
- Providing appropriate training and a safe work place, and,
- Defining strategic quality goals and objectives, including statutory, and client requirements.

7.3 Infrastructure

The Director / General Manager ensures and maintains a safe and comfortable work environment for all employees and subcontractors.

Wherever possible, reasonable accommodation is made available for a specific individual's accessibility or ergonomic needs.

Workstations are ergonomically arranged to support personal comfort and productivity, and work areas are organised according to space required for the assigned tasks.

Financial aid, equipment, tools, communication, technology and supplies are made available to each job function or workstation, with testing and tagging conducted on all electrical equipment, when required.

Concerning hazardous-flammable substances where appropriate, hazardous-flammable warning signs and safety notices are displayed; hazardous-flammable substances are stored within cabinets and other secure storage facilities, which can be used for different materials-items, as specified by the items Safety Data Sheet (SDS).

7.4 Management Representative

The Company Director / General Manager have appointed the HSQET Coordinator as the management representative in relation to all Quality, Health, Safety and Environmental matters.

The HSQET Coordinator submits all documents and procedures in relation to the IMS management system to the Company Director / General Manager for final approval.

The HSQET Coordinator is responsible for:

- **Ensuring** the requirements of the Quality, Health, Safety and Environmental Standards and relevant legislation are understood, implemented, and maintained throughout the company,
- Ensuring all corrective actions are implemented to resolve any nonconformance raised,
- Ensuring preventive actions are taken based on potential nonconformities accessed through data analysis, and,
- Organising system audits as per ISO 9001, AS 4801 and ISO 14001 management Standards, including other accreditation/s compliance-audits.

Integrated Management System		Uncontrolled When Printed	Issue Date: August 2020
(IMS)			_
JBM-M-01	Version 3.1		Page 25 Of 78



The HSQET Coordinator reports directly to the Company Director or General Manager in their absence, on the effectiveness of the IMS System including but not limited to, nonconformances, customer complaints, system failures and audits results.

7.5 Organisational Responsibility and Authority

The functional responsibilities and organisational structure is defined through our organisational chart, job descriptions, company policies, and system procedures.

The Management Team ensures that every team member has access to tools and resources required for their tasks.

Senior managers, site managers and supervisors are to be trained in QHSE obligations/due diligence, and the company's QHSE management system requirements relevant to their role.

Training requirements include:

- Certificate IV OHS,
- Company HIRAC manual, work instructions, project management plan, incident / accidents reports and investigations, emergency responses, and critical incident response.

Refer: JBM-R-09 TNA / Training Register

Relevant Managers and Supervisors are responsible for providing training and awareness, to ensure all members of their team understand corporate goals, objectives, targets, and are trained in the IMS management system.

All employees/subcontractors are responsible for the quality of their work as it contributes to the quality of John Bedwell Management products, services and organisational environment.

Executive planning strategies are communicated to the employees through management staff and company meetings. Opportunities to improve existing processes are investigated and implemented, if required.

8 Roles and Responsibilities

In the event of a site emergency, all John Bedwell Management employees are required to assist as per the site emergency response plan.

The site emergency plan for the company, is also the project emergency plan due to the Head Office / Workshop being used as the central location.

The supervisor onsite at the time of the emergency is the responsible person/s.

A supervisor could be a staff member, manager, and or Director / General Manager dependant on the site situation at the time of the emergency.

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 26 Of 78



The Company Director / General Manager and relevant managers will ensure that each employee has an accurate and up-to-date position description that specifies information that relates to a particular position including:

- Position title,
- Key responsibilities,
- Competencies-skills required for the position.

Training needs analysis is conducted on all new staff against the position description and job requirements, recorded within the employee database.

Position descriptions will be reviewed annually. New positions descriptions are subject to the Director / General Manager approval, prior to implementation.

Staff specific signed position descriptions are located within each staff member's personal file, which is securely kept.

- **❖** JBM-F-30 Position Descriptions
- JBM-M-03 Emergency Plan and Evacuation Map
- JBM-R-09 TNA / Training Register

8.1 Employees and Subcontractors

Responsibilities include:

- Report any accidents/incidents, near misses, to the immediate supervisor onsite,
- Comply with all John Bedwell Management system requirements,
- Attend all required inductions, meetings and training requirements deemed appropriate by John Bedwell Management,
- Ability to supervise the site incase of an emergency situation concerning any onsite emergency.

8.2 Visitors

- Comply with all site specific instructions and rules determined by John Bedwell Management,
- Never walk around site without being accompanied by an John Bedwell Management employee,
- Attend all relevant meetings (example: pre shift meetings),
- Report any, Health, Safety, Quality and Environmental issue to a John Bedwell Management Manager or employee to whom they are accompanied by.

Defined position descriptions are available for all company positions, these are located at our Head Office, and available upon request refer, *JBM-F-30 Position Descriptions*.

8.3 Dismissal of Employment or Agreement

 Verbal warning by supervisors clearly out lining the breach and what corrective actions required by the individual to conform to John Bedwell Management Pty Ltd policy and procedures and NT legislation (Supervisor to record)

Integrated Mai (IMS)	nagement System	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 27 Of 78



- First written warning by supervisor outlining the verbal warning given and the seriousness of a second breach and what corrective actions are required by the individual to conform to John Bedwell Management Pty Ltd policy and procedures and NT Legislation. Supervisor to record and report to management. Warning to be kept on file and verbal warning to be documented.
- John Bedwell Management Pty Ltd reserve the right to issue first and final written warnings at once for what management believe to be major breaches of company policy.
- Final written warning by management outlining the verbal and 1st written warnings, stating that this will be the last warning before termination. Outlining what corrective actions the individual can take to conform to John Bedwell Management Pty Ltd procedure and policy. Management to add to file
- A further breach will result in the individual being summoned to the office, his previous warning given to him, and a termination letter explaining the breaches of John Bedwell Management Pty Ltd procedure and policy and NT legislation

8.3.1 Instant Dismissal

Individual to be summoned to the office and handed a termination letter explaining the breaches of John Bedwell Managements policy, procedure and NT legislation

Note: Failure to comply with any of our policies or procedures, could lead to immediate termination of employment or contract, subject to the Director / General Manager discretion, this is applicable for all warnings.

9 Training

John Bedwell Management understands that training is a vital part of ensuring site safety and environmental compliance on all our sites.

Training consists of the following, but not limited to:

- Site specific rules,
- Company HIRAC procedures, including but not limited to JSEA's, PRA's, DRA's,
- Health, Safety, Quality and Environmental risks and control measures,
- Incident, Accident, Near Miss Reporting,
- Hazardous Substances,
- Working with Asbestos, (where required),
- Working at Heights / Mobile Scaffolds,
- Emergency Responses, and,
- Company Work Instructions.

Training assists with preventing-minimising the risk of an accident or injury occurring.

The company conducts training need analysis within the training register, to ensure that all personnel onsite are competent/ qualified or under direct supervision of a supervisor.

Integrated Management System		Uncontrolled When Printed	Issue Date: August 2020
(IMS)			_
JBM-M-01	Version 3.1		Page 28 Of 78



Within this process identification /verification is conducted for but not limited to QHSE training, competency, qualification and licencing requirements for all workers/subcontractors, against the required scope of works / positions requirements and the actual achievements e.g training/certificates recorded within the TNA / Training Register.

- ♦ JBM-F-24 General Skills Assessment, JBM-F-24B Working at Heights Skills Assessment
- JBM-R-09 TNA / Training Register

9.1 Company Inductions

Company inductions – training is based on this management manual conducted prior to the commencement of employment, containing but not limited to:

- Risk-hazard methodology, hierarchy of control,
- Safe work method statements,
- Work instructions,
- Safe operating procedures,
- Legislative requirements,
- Environmental management,
- Quality management,
- Emergency response procedures.

The company induction – training is mandatory requirement for all company employees.

All subcontractors are inducted-trained into our methodology for hazard identification, risk assessments, safe work method statements, incident/accident/near miss reporting process, emergency responses and environmental protection controls along with any further quality aspects that are relevant to the work tasks on the project.

To ensure that an understanding of the process is understood, it is conducted through our site-specific induction process.

- **❖** JBM-F-08 Company Induction, JBM-F-08B Project Induction, JBM-F-07A Subcontractor Evaluation, JBM-F-07D Project Debrief
- ♦ JBM-R-09 Training Register

9.2 Site Specific Induction Training

Site specific inductions based on John Bedwell Management requirements including the site specific requirements, conducted by a senior staff member for employees and subcontractors prior to the commencement of the works onsite.

The induction can cover the following topics:

- Brief description of scope of works, works in progress and the site layout,
- Notification of hazards, including understanding the project risk assessment for the site (PRA) including our company risk methodology and control methods,
- Site rules, emphasis that health, safety and environmental compliance is everyone's business and that the company requires care and co-operation by all,

Integrated Management System		Uncontrolled When Printed	Issue Date: August 2020
(IMS)			_
JBM-M-01	Version 3.1		Page 29 Of 78



- First aid arrangements and contact details,
- Indicate who is the site work health and safety person is,
- Explain when personal protective equipment, such as gloves, safety boots, UV protection and high visibility clothing have to be worn,
- Explain the importance of maintaining the site as a safe work place cover items such as; driving
 on site, electrical plugs, leads and tools, maintaining site in a clean and tidy condition,
- Point out any high-risk construction activities where safe work procedures apply, e.g.: asbestos, confined spaces, working at heights etc.,
- Emergency procedures, including location of assembly area, emergency exits and amenities, first aid kits, fire extinguishers and emergency contact numbers, scenarios,
- Identified hazards at worksite,
- Legislative requirements,
- Waste management plan.

Any other relevant health, safety and environmental issues, that becomes apparent during project start up, or through the duration of the project will be included in the site-specific induction.

❖ JBM-F-08B Project Induction, JBM-F-09 Daily Briefing, JBM-F-09B Toolbox Talk, JBM-F-26 Lessons Learnt

9.3 Visitors Inductions

Visitors this site are site inducted briefly, due to being accompanied at all times around the work site by an authorised John Bedwell employee.

Visitor inductions include:

- Notification of the daily hazards,
- Supervisor in charge,
- Muster point, in case of emergency, and,
- Who the custodian is for them.
- PPE Requirements and Issue.

Only people who have attended this induction will be permitted onto the job site.

Records for the visitor inductions are recorded within the site visitor induction register.

❖ JBM-R-17 Site Induction / Visitor Register

9.4 Qualifications and Training Needs Analysis (TNA)

John Bedwell Management retains a copy of all certificates and training achievement for all company personnel. Company personnel are required to complete the company induction, subcontractors may be required to attend also dependant on level of our system to be used.

Subcontractors are required to supply their employee's qualifications as part of the subcontractor evaluation prior to the commencement of works on the project.

Training needs analysis is conducted within the TNA / company training register, to identify wether the individual has in fact the required skills/training for the position and or task to complete, further verification of subcontractors qualifications/competencies/licences is verified as part of the induction process.

Integrated Management System (IMS)	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01 Version 3.1		Page 30 Of 78



JBM-R-09 TNA / Training Register.

9.5 Plant and Equipment Training

All Staff and Contractors who operate John Bedwell Management mobile equipment must undergo onsite assessment or training to ensure competency for the task.

The Senior Management, in conjunction with the HSQE Coordinator/Officer:

- If previous training or competency is held by employee or contractor, usually a visual inspection is required though a skills assessment,
- If no previous training or competency the employee or contractor may start training on the machine under direct supervision of a competent operator- through formal training as in JSEA sign on,
- Once the appropriate hours have been achieved (time sheet, log book) under direct supervision of a competent operator, a skills assessment (internal) can be conducted,
- Once Hours are up and the Project Manager-Supervisor is satisfied, an accredited assessment by registered trainer - registered training organisation (RTO) can also be sought.

No untrained operator will work unsupervised on any of our projects for plant operation.

High-risk machine operations such as e.g. EWP operations, the operator is required to hold the relevant licence prior to any operation of equipment.

Trainee's apprentices are used within this site under the direct supervisor of a licenced/qualified tradesman.

- **❖** JBM-F-24 Skills Assessment, JBM-F-08 Company Induction, JBM-F-07A Subcontractor Evaluation Form
- JBM-M-07A Site General Safe Operating Procedures, JBM-M-07B Plumbing Safe Operating Procedures
- JBM-R-09 TNA / Training Register.

9.6 Small Plant and Equipment

Small plant and equipment validation of competency is conducted through either JSEA training/sign on, or SOP's. Verification is through the skills assessment conducted, by a competent person.

9.7 Skills Assessments

John Bedwell Management conducts skill assessments on all subcontractors, and site personnel concerning their skills regarding high-risk activities or plant operations.

A senior staff member who holds the current competency/ticket conducts skill assessments.

The senior staff member should hold the appropriate competency issued by an approved RTO where possible, along with having the evidence of experience to be able to conduct the assessment.

Where there is an qualified trainer available, they can assess the machines appropriate to their skills set, if any skills assessments that are not within the skill set of the trainer, a company employee 'industry experts' will be used to assist with the assessment.

JBM-F-24A General Skills Assessment, JBM-F-24B Working at Heights Skills Assessment

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01 Ve	ersion 3.1		Page 31 Of 78



9.8 External Training

Other training is provided as required through RTO's, for accredited courses that can include but not limited too:

- Health and safety representative's training, when required, is conducted as per legislative requirements.
- Accredited courses, but not limited to Work Health Safety, Project Management,
- Fire warden training,
- First aider training,
- Forklift training.

Where required, operators must also hold NT WorkSafe accreditation and relevant tickets and licences (Only required for High-Risk Licence e.g.: Forklift, Ewp).

If the operator has not achieved the required ticket or competency, they will be under direct supervisor under competency has been achieved. External training is evaluated through a training evaluation.

This form is to determine whether the training is effective to the company's requirements.

❖ JBM-F-24 Skills Assessment

Toolbox meetings will be held with all employees and subcontractors to highlight changes in training/work routines and any modifications in work methods, these talks are documented and include attendance record; the meeting are conducted as a minimum monthly onsite or more frequently if required by HSQE Officer / Project Manager.

JBM-F-09 Daily Briefing, JBM-F-09B Toolbox Meeting, JBM-F-10 Work Order / Site Prestart Check

10 Communication

The HSQE Officer / Project Manager is the designated 24-hour emergency contact for external authorities. They have the authority to take any action on site as directed by an authorised officer of any relevant external authority.

The General Manager visits sites on a monthly basis to discuss any Health, Safety, Quality and Environmental issues with site management and personnel, this information obtained is discussed with the company director for review-input, through verbal phone calls, emails etc. The Company Director visits sites on an annual basis.

The results from the inspections / audits are notified to he site supervisor whom, will notify personnel through either the morning pre start meeting or a toolbox meetings.

Consultation arrangements including but not limited to WHS Committee has been established with workers, recorded within the toolbox meeting / daily briefing form with the meetings minutes either displayed or accessible for staff located within the toolbox folder at company office.

Further reference to WHS Committees / Training / HSR is detailed within JBM-M-05 (16).

Integrated Management System (IMS)	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01 Version 3.1		Page 32 Of 78



JBM-F-09 Daily Briefing, JBM-F-09B Toolbox Meeting

10.1 Toolbox Meetings and Daily Briefs

Dependant on the the natural of the project works.

The Project Manager / Supervisor will either conduct the daily meeting prior to the commencement of work, at the office / workshop location or onsite

This details where each staff member/team is and what they are doing for the day. The document is keep at the office, to inform employees and subcontractors of the daily activities in relation to the project site.

Onsite the work order / site pre start checklist form incorporates hazard identification prior to the commencement of tasks.

Documenting all Health, Safety, Quality and Environmental issues, which are raised and addressed to ensure employees and subcontractors, are aware of their surroundings.

JBM-F-09 Daily Briefing, JBM-F-09B Toolbox Meeting, JBM-F-10 Work Order / Site Prestart Check

10.1 Lesson Learnt Alerts

Lesson learnt alerts (JBM-F-26) are issued for any concerning information that is concerned with the company operations concerning quality, health, safety or environmental issues.

Information contained in the alerts can be sourced from an external source (e.g. regulatory body alerts), new legislative or standard information, faulty items, incident/accident or near miss investigations and nonconformances-investigations.

The HSQET Coordinator issues the alerts to all company Management staff, which is to be displayed at all, project sites including head office.

10.2 On-Site Communication

The Project Manager / HSQET Coordinator (or the Supervisor in their absence) is the contact point for all quality, safety, environment, traffic management issues and emergencies on site.

Daily briefings are conducted on site to discuss any issues raised from the previous day and to ensure the appropriate control measures are in place prior to works commencement for the day.

Weekly inspections are conducted to identify any new site hazards or issues.

Monthly the Company Director / General Manager/s will visit our project sites to participant in either the site inspection or monthly audit, attendees involved in these site inspections or audits are, but not limited to subcontractors, site personnel, and any other relevant personnel onsite.

The results from the inspections / audits are notified to all the site supervisor who will notify personnel through either the morning pre start meeting or a toolbox meetings.

	Management System	Uncontrolled When Printed	Issue Date: August 2020
(IMS)			
JBM-M-01	Version 3.1		Page 33 Of 78



Monthly toolbox meetings are held to discuss project progress and actual outputs against targets and to discuss other issues such as near misses, incidents or accidents, IMS nonconformances, legislative changes, corrective actions and improvements.

10.3 External Communication

The Project Manager / HSQET Coordinator are the designated 24-hour emergency contacts for external authorities. They have the authority to take any action on any site as directed by an authorised officer of any relevant external authority.

In relation to any communication with the *Media* this will be communicated through the Company Director / General Manager only.

10.4 Communication with Subcontractors

Contact names and phone numbers for Subcontractors are available within the company approved subcontractor register kept at the head office refer, *JBM-R-20*.

The Project Manager is the contact person for all subcontractor matters.

10.5 Community Liaison

All external stakeholders including but not limited to; relevant authorities, residents, businesses and others that could be affected by project works will be informed of the project activity-hazards and timeframes in conjunction with our HIRAC process.

Ensuring that any possible hazard, potential risk to project or other party /stakeholders has been identified with appropriate control measure in place e.g. fuel tank next to project works, controlled within our project risk assessment (PRA), ensuring that appropriate control measures-actions have been applied, for example through traffic management - variable message boards, barricades, signage, or media announcements as appropriate in accordance with our HIRAC process.

Communication is recorded through either using our Project Debrief for subcontractors or our Toolbox Meetings form.

Enquiries about the works from external parties are recorded on the communications and complaints register.

- **♦** JBM-F-01 Project Risk Assessment, JBM-F-07D Project Debrief, JBM-F-09B Toolbox Meeting, JBM-F-12 Corrective Action, Nonconformance Report-Investigation
- ❖ JBM-R-18 Communication / Complaints Register

10.6 Complaints

Any complaints concerning any aspect of the project are registered, investigated and recorded through using our *JBM-F-12 Corrective Action – Nonconformance Report Investigation Form.*

Integrated Management System		Uncontrolled When Printed	Issue Date: August 2020
(IMS)			_
JBM-M-01	Version 3.1		Page 34 Of 78



The communications / complaints register shows the details and nature of the complaint, the complainant and actions taken as a result of the investigation, cross-referencing any other nonconformance reports or other relevant documentation, applicable to the complaint.

If an Environmental complaint (such as a complaint regarding noise or pollution) is received, a written report will be prepared and given to the client representative as soon as practically possible. This report includes details of the complaint, action taken to correct the problem and proposed measures to prevent the occurrence of a similar Incident.

The HSQET Coordinator / Project Manager ensures that any complaint received is investigated promptly and that appropriate action is taken.

10.7 Consultation and Participation

John Bedwell Management promotes the active participation of all employees in Health, Safety, Quality and Environmental decisions. Employees are consulted and given opportunity, encouragement and training to be proactively involved in HSQE matters affecting the organisation and their work activities.

Consultation occurs in reference to, but not limited to, the following subjects / topics:

- Hazard identification and risk assessment processes,
- Control measures for the management of hazards and risks Health, Safety, Quality and Environmental.
- Changes to the organisation's policies and procedures of work routines, which may affect Health, Safety, Quality and Environmental,
- Incidents, near misses, nonconformances, corrective actions and improvements,
- Changes to Health, Safety, Quality and Environmental Legislation / Regulations,
- Conflicts, and,
- Election of Health, Safety, Quality and Environmental and employees representatives.

All internal workplace consultation is recorded using either our *daily briefing or toolbox forms*, occurring at a minimum of a monthly basis or as required. External communications can be also recorded using *daily briefing or toolbox forms*, however if the communication is a compliant this is to be recorded within the *corrective action/nonconformance report-investigation* to ensure that the appropriate action is taken to rectify or close out the complaint.

- JBM-F-09 Daily Briefing, JBM-F-09B Toolbox Talk, JBM-F-12 Corrective Action, Nonconformance Report Investigation
- JBM-R-18 Communication / Complaints, JBM-R-06 Nonconformance Corrective Action Register

10.8 Conflict / Bullying Resolution Process

John Bedwell has developed a policy, located within this manual and our company IMS, displayed at all work sites, and notified within our induction process.

If any conflict cannot be resolved using the internal processes, NT worksafe (1800 250 713) is to be contacted as soon as possible to assist with further mediation.

Integrated Management System		Uncontrolled When Printed	Issue Date: August 2020
(IMS)			_
JBM-M-01	Version 3.1		Page 35 Of 78



Conflict resolution is aimed to ensure that any conflict within the workplace is identified, dealt- with-investigated where necessary and rectified.

To ensure compliance with our resolution/ anti-bullying process we have implemented a further work instruction to assist in this process.

- JBM-F-08 Company Induction, JBM-F-08B Project Induction, JBM-F-09 Daily Briefing, JBM-F-09B Toolbox Talk.
- JBM-R-18 Communication / Complaints Register, JBM-R-20 Approved Subcontractor Register
- ❖ JBM-M-05 Management Instructions, (09) Resolution Process.

11 Project Management

For each individual project a Project specific management plan must be developed & signed by the authorised senior manager

Contractual obligations set by tender requirements stipulate project-specific plans referred to as HSQE Project management plan *(JBM-M-02)* as follows:

- HSQE Management Plan reviews are undertaken in accordance with IMS schedule (JBM-R-22)
- HSQE Project management plans (JBM-M-02) are developed in conjunction with the contractual requirements from the client for specific projects and identified hazards / risks identified.
- HSQE Project management plans, risk assessments are reviewed on a continual at a minimum 6 monthly basis,
- HSQE Project management plans (JBM-M-02) are developed to ensure that our health, safety
 quality and safety obligations and requirements are adhered to,
- Risk assessments are conducted prior to the development of the HSQE project management plan to ensure that all hazards have been identified and controlled including but not limited to, public safety, design builability, products, services, personnel, and subcontractors incorporating our HIRAC risk management processes,
- Legislative requirements, relevant acts, regulations, codes of practice, Australian standards are used for reference that are applicable to our works,
- HSQE Project management plans (JBM-M-02) are only used if the client requests the plan as
 part of a contractual requirement-if no specific plan is to be used all works on the project will
 work under the company IMS system,
- HSQE Project management plans (*JBM-M-02*) are an integrated plan that incorporates Quality, Health, Safety and Environmental requirements, and,
- HSQE Project management plans forms are located within the Project management plan folders.

Procurement for projects is undertaken by the Project Manager, which includes but is not limited to the subcontractors requirements, project deadlines, required resources to complete the project.

3	anagement System	Uncontrolled When Printed	Issue Date: August 2020
(IMS)			
JBM-M-01	Version 3.1		Page 36 Of 78



Site-specific objective and targets, key performance indicators (KPI) are established for large projects (over 2 months) in line with our company objectives and targets. The mechanism for compiling data to ensure objectives & targets are met is the company's IT program Xero. All other projects are under the company objectives.

If any changes to the Project management plan or project are identified, these are related to all site personnel through the daily briefing, toolbox talks, HSQE lessons learnt, and or emails, providing input from the site personnel if there are any concerns from the new changes, which will be actioned by the supervisor if possible or escalated to the Project Manager for further investigation.

If any nonconformance has been raised, this may be closed out by the Project Manager due to the non-severity of the issue, or forwarded to the HSQET Coordinator for review and to provide an action plan for.

If the customer requires no project plan, this IMS management manual, which comprises the manual and forms, will be used to ensure compliance with our system.

- JBM-F-08B Project Induction, JBM-F-09 Daily Briefing, JBM-F-09B Toolbox Talk, JBM-F-26 Lessons Learnt
- ❖ JBM-M-02 HSQE Project Management Plan
- ❖ JBM-R-17 Site Induction / Visitor Register

12 Subcontractor Management

John Bedwell Management only engage suppliers and subcontractors who have the correct, but not limited to, valid competencies and experience, insurances to perform the work adequately.

12.1 Selecting and Engaging Subcontractors

In the project planning process, the HSQE Officer / Project Manager identifies work to be subcontracted and determines:

- The method of selecting subcontractors subcontractor system evaluation (JBM-F-07A), level of system implemented including; but not limited to the use of hierarchy of controls, relevant legislative requirements identified, SWMS-JSEA-Plan Review (JBM-F-07B),
- Ability to achieve the scope of works,
- Hazards impacting on the client/other entity or within the project in accordance with our HIRAC process,
- The type and level of subcontractor control required, as per score table (JBM-F-07C Evaluation Risk Score),
- The Project Manager prepares a list of potential subcontractors, then conducts our pre shift debrief meeting to assess against the contract requirements.

This is conducted through our project debrief meeting (*JBM-F-07D*) conducted with all subcontractors - suppliers prior to engagement on site.

12.2 Managing Subcontractors Onsite

The Project Manager applies a level and type of control to subcontractors appropriate to the risks associated with the subcontracted works.

Integrated (IMS)	Management System	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-0	1 Version 3.1		Page 37 Of 78



John Bedwell Management provides site-specific inductions to Subcontractors on site by:

- Informing the subcontractors of their responsibilities,
- Informing subcontractors our risk methodology,
- Project hazards-risks identified and controlled,
- Emergency preparedness,
- Identifying appropriate John Bedwell Management personnel (Project Manager and Supervisor / HSQET Coordinator) onsite, who have authority to direct subcontractors to stop work if there is any breach to our onsite safety or environmental requirements.

John Bedwell Management provides instruction and training on any systems or documentation that the Subcontractor is expected to work under or use.

All subcontractors who provide services for the project must either:

 Have independent management systems, verified and audited by John Bedwell Management,

Or

• Be controlled directly by John Bedwell Management personnel in compliance with this plan.

John Bedwell Management monitors all subcontractors' work for compliance with Health, Safety, Quality and Environmental requirements. This is done through inspections conducted on subcontractors through a checklist conducted monthly or as required due to time frame the subcontractor is on site. This is conducted for all subcontractors.

- ❖ JBM-F-07A Subcontractor Evaluation, JBM-F-07B SWMS/JSEA/Plan Review, JBM-F-07C Subcontractor Evaluation Risk Score, JBM-F-07D Project Debrief, JBM-F-16 Equipment Authorisation Checklist, JBM-F-21 SWMS / JSEA Compliance Check, JBM-F-22 Subcontractor Onsite Review
- ❖ JBM-M-05 General Work Instructions -13 Project Management
- ❖ JBM-R-20 Approved Subcontractors Register

12.3 Subcontracting To Principal Contractor

In the event that John Bedwell Management is to be a subcontractor to a principal contractor the following will apply:

Plant daily inspections are to be used on a daily basis for all company machines.

If the principal contractor has an accredited management system in place, any forms that are filled out by John Bedwell Management employees or subcontractors should be obtained from the principal contractor.

A copy of the forms will need to be forwarded to the company office to ensure evidence is obtained to provide compliance with our management system.

If evidence cannot be obtained from the principal contractor the internal company forms are to be completed (e.g. incident, accident, near miss report-investigation involving company personnel)

Integrated Management System (IMS)	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01 Version 3.1		Page 38 Of 78



If the principal contractor does not have an accredited management system in place, appropriate forms as per this manual will be applied, as per the nature of the project, environmental issues, hazards identified and time frame.

The HSQET Coordinator and Project Manager are responsible for ensuring the correct course of action is applied and evidence is obtained for these circumstances.

12.4 Project Operational Control

Project operational control is established appropriately for each activity associated with significant environmental aspects regarding suppliers and including subcontractors.

This is achieved by ensuring appropriate control procedures or work instructions are established and implemented to ensure work is performed in accordance with our environmental policy, aspects/impacts, obligations and established environmental objectives and programs.

13 Risk Management

John Bedwell Management aims to provide a process to systematically identify hazards, assess each hazard, determine the associated risk level and implement appropriate control measures.

John Bedwell Management has established the following processes to enable effective risk management:

- Identifying project site-activity Health, Safety, Quality and Environmental hazards,
- Assessing the risks associated with the project hazards and devising ways to eliminate or minimise the risks,
- Environmental aspects and impacts,
- Implementing and prioritising control measures following risk assessment and monitoring risk control measures.

The HSQE Officer / Project Manager shall ensure that hazards and risks are satisfactorily assessed, controlled and monitored in accordance with our HIRAC process.

13.1 Hazard Identification / Assessment of Risks

A hazard is a potential source of injury, illness, disease, environmental impacts, cost and quality aspects associated with our systems of work.

The process of hazard identification involves reviewing records, identifying but not limited to, all potential injuries, illnesses diseases, environmental impacts, cost and quality aspects prior to the start of any project or task, with continual monitoring and updated when required until finalisation of the project tasks, in accordance with our risk methodology.

Daily briefing meetings (*JBM-F-09*) are conducted to discuss the daily tasks with management and project personnel.

The work order – site prestart check (*JBM-F-10*) is to identify if there is any new hazard or risk prior, during the works. Any new hazard or risk is added to the existing completed project risk assessment (PRA).

Integrated Management System		Uncontrolled When Printed	Issue Date: August 2020
(IMS)			
JBM-M-01	Version 3.1		Page 39 Of 78



Task specific activities are managed through the implementation of job safety environmental analysis (JSEA), which are checked prior to use, to ensure that all hazards and control measures are accurate and in place, prior to the commencement of the task.

The onsite team assesses the project continually for any new hazards, this is conducted through notifying the HSQET Coordinator or Project Manager immediately when a new hazard occurs, and conducting verbal discussion throughout the day, new hazards identified are recorded within the work order – site prestart check form.

Additional JSEA's, SOP'S, and or work instructions are developed when required. All personnel are inducted-trained in the appropriate control measures.

Site-specific projects are managed with project-specific risk assessment (PRA), including but not limited to additional resources such as, work instructions, and individual JSEA for specific tasks.

The project risk assessment *(JBM-F-01)* is developed in relation to the design-activities associated with the overall project.

All new hazards identified on the project are added to the project risk assessment (PRA).

Identification of hazards and the assessment of risks shall be undertaken:

- Prior to the commencement of a project,
- Before the introduction of any plant or substance for the first time at a work place,
- Before work of a type not previously performed at a work place is commenced,
- When there is a change in the type of work, work practices or plant at a work place that may result in an increased risk to the health and safety of a worker or other person at the work place, or
- When information becomes available concerning work, work practices, plant, or substances at a work place that may impact on the health safety of a worker or other personnel at the work place and or environmental impacts.

Where an assessment indicates that there is a significant risk to the health and safety of a worker or other person, steps to be taken to meet the requirements of these regulations will be identified within the PRA, possible engagement of external/accredited providers for:

E.g. Dust Monitoring may be required, this is to be actioned by the HSQE Officer / Project Manager.

An assessment will be revised when there is evidence to indicate that it is no longer valid, or in any case, at intervals not longer than twelve (12) months.

A record of the risk assessments shall be kept for a period of five (5) years after the last review.

Where a risk assessment relates to exposure of a worker to a hazardous substance and the assessment indicates a requirement for health surveillance or for monitoring of a worker's exposure to the substance, this shall be kept for thirty (30) years after the last review.

Integrated Management System (IMS)		anagement System	Uncontrolled When Printed	Issue Date: August 2020
	(IMS)			_
	JBM-M-01	Version 3.1		Page 40 Of 78



13.2 Risk

Risk is the combination of the probability and possible consequence of injury and illness arising from exposure to a hazard.

Likelihood X Consequence = Risk Level

13.2.1 Likelihood

This is the likelihood of the occurrence, taking into consideration how often and how long people are exposed to the hazard. To make the "best estimate" of the probability the following should be considered:

- Number of persons exposed to the hazards,
- How often they are exposed to the hazard and the duration of the exposure,
- Safety incident reports including post accident reports, near miss report, and reports by Employees, Supervisors and client,
- Statistics,
- Industry alerts of accidents,
- Adequacy of risk control measures in place,
- Information gained during hazard identification.

The probability of the likelihood of occurrence, occurring during the project timeframe can be categorised as follows:

Almost Certain expected in most circumstances

Likely likely to occur repeatedly
 Possible likely to occur several times
 Unlikely likely to occur sometimes
 Rare not likely to occur but possible

13.3 Consequences

Assuming the occurrence the next possible step is to estimate the likely severity of the hazard. Consequence also requires a judgement on how many people could be affected from the one Incident. To estimate the consequences the following table needs to be considered:

13.3.1 Consequence Table

	Insignificant	Minor	Moderate	Major	Catastrophic
OHS	Minor incident / first aid	Medical treatment injury / restricted work duties /	LTI less than 5 days minor Injury	Minor Permanent disability / LTI greater than 5 days	Fatality / Serious permanent disability

(IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 41 Of 78



		general safety breach			
Environmental	Negligible reversible impact, requiring minor remediation	Minor reversible impact, requiring minor remediation	Moderate impact short term effect, moderate remediation	Serious impact with medium term effect, significant remediation	Disastrous environmental impact, long term effect, major remediation
Quality	Less than \$50K in damage or cost	\$50K - \$100K in damage or cost	\$100K - \$200K in damage or cost	\$200K - \$300K in damage or cost	Greater than \$300K in damage or cost

The consequence falls within one of the following categories:

Level of Risk

Once you have estimated the probability and the consequence, the risk assessment matrix (below) is to be used to determine the level of risk associated with each identified hazard.

The level of risk is categorised as:

Category	Outcome
Almost Certain	Expected to occur in most circumstances
Likely	Likely to occur repeatedly
Possible	Likely to occur several times
Unlikely	Likely to occur but only sometimes
Rare	Not Likely to occur but possible

John Bedwell Management identifies a risk class/ranking for potential work place hazards by referring to the categories in the matrix below.

Integrated Management System (IMS)	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01 Version 3.1		Page 42 Of 78



13.4 Risk Matrix

		Consequences								
			1	2 3		3	3 4		5	
		Ins	significant		Minor		Moderate		Major	Catastrophic
	CHS Minor incident/first aid Environmental Negligible reversible impact, requiring minor remediation		treatment injury/ restricted work duties/general safety breach Minor reversible impact, requiring minor					Minor Permanent disability/ LTI greater than 5 days	Fatality/Serious permanent disability	
					Moderate impact short term effect, moderate remediation		Serious impact with medium term effect, significant remediation	Disastrous environ impact, long term effect, major remediation		
	Quality		Less than \$50K in damage or cost		\$50K - \$100K in damage or cost	\$100K - \$200K in damage or cost		\$200K - \$300K in damage or cost		Greater than \$300K in damage or cost
	Almost certain Could occur with the failure of defences	5	High		Extreme		Extreme		Extreme	Extreme
QC	Likely Could occur with the failure of defences	4	4 High		High		Extreme		Extreme	Extreme
LIKELIHOOD	Possible Involve the failure of a hard defence or multi basis defences	3	Moderate		e Moderate		High		High	Extreme
Š	Unlikely Involve the failure of multiple hard defences	2	Low		Low		Moderate		High	High
	Rare Involve the unlikely failure of multiple hard defences	1	Low		Low		Low		Moderate	Moderate

LOW	Acceptable Risk may proceed with current controls in place.	HIGH	Work cannot commence, additional supervision is required, increased inspection and/or permits to work, controls are to be reviewed by senior management prior to proceeding.
MODERATE	Controls are to be reviewed by senior management prior to proceeding, work may proceed.	EXTREME	STOP WORK immediately, unacceptable risk.

13.5 Risk Control

Where risks to health safety including but not limited to injury, illness, disease, environmental impacts, cost and quality aspects or subcontractors use of hierarchy of controls, relevant legislative requirements have been identified, controls must be introduced to reduce risk levels to an acceptable level in accordance with legislative requirements. This is conducted through reducing the likelihood and/or consequence that may result from the hazard.

(IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 43 Of 78



When introducing a control measure, consideration should be given to what is "practicable" in each instance. "Practicable" means having regard to:

- The severity of the hazard or risk in question,
- The state of knowledge about the hazard or risk, and any way of removing or mitigating that hazard or risk,
- The availability and suitability of ways to remove or mitigate that hazard or risk, and,
- The cost of removing or mitigating that hazard or risk.

The following **HIERARCHAL APPROACH** to risk control is used within the HSQE Management System:

Control	Explanation	Example	
Elimination	Elimination should always be the first preference as it is a permanent solution. Where hazards cannot be eliminated then control them to minimise the risk.	Changing processes to eliminate the hazard altogether, such as fixing-removing faulty equipment from use.	
Substitution	If you cannot eliminate the hazard altogether, replace the hazardous plant, equipment, substance or process with a less hazardous one.	Using a different, less dangerous piece of plant or equipment, substance or process.	
Isolate the Hazard	Isolate the equipment from use	Barricade the plant or equipment from use or interaction in the workplace	
Engineering controls	Redesign or alter the plant or equipment to ensure the work is performed safely		
Administrative Controls	Introduce procedures and provide instructions to reduce the exposure to the hazard.	, ,	
Personal Protective Equipment	Personal Protective Equipment (PPE) should always be the last control option.	ment Ear Plugs, Safety Boots, High Vis	

Administrative controls and PPE should only be used:

- When there are no other practical control measures available (as a last resort),
- As an interim measure until a more effective way of controlling the risk can be used,
- To supplement higher-level control measures (as a back-up).

A combination of controls is often appropriate; however the solution should follow the Hierarchy of Control. A checklist is used for all SWMS/JSEA (risk assessments), prior to being approved for use on our site.

❖ JBM-F-01 Project Risk Assessment (PRA), JBM-F-02 Job Safety Environmental Analysis (JSEA), JBM-F-07B SWMS / JSEA / Plan Review, JBM-F-21 SWMS/JSEA Compliance Check.

13.6 Monitoring

Once control mechanisms have been established, regular monitoring takes place.

	ntegrated Ma (IMS)	nagement System	Uncontrolled When Printed	Issue Date: August 2020
J	JBM-M-01	Version 3.1		Page 44 Of 78



This monitoring may include, but not be limited to:

- PRA, JSEA or SWMS reviews,
- Seriousness of the risk,
- Experience and skill of employees involved,
- Legislative or client requirements,
- Supervision,
- · Checklists associated with work procedures,
- Witness and Hold Points,
- Medicals.
- Incident/accident/near miss report-investigation,
- Records or regular testing or inspections.

14 Hazard Reporting

John Bedwell Management encourages all employees/subcontractors to report all hazards immediately to their relevant supervisor. All hazard/risk assessments are conducted in accordance with our HIRAC processes.

Where the hazards cannot be corrected immediately, the hazard is reported and recorded either the project risk assessment (PRA), task specific JSEA, or work order and site prestart check form.

Once the new hazard has been recorded, a review is actioned by the Project Manager.

The HSQE Officer / HSQET Coordinator investigates all hazards, to ensure that the correct methodology has been used; pre requisite for conducting investigations is identified within the Training Register.

Ensuring the effectiveness of the control measures to eliminate any further risk and/or minimise the likelihood of an accident-incident, until the hazard is addressed and all risks have been mitigated or reduced.

- JBM-F-01 PRA, JBM-F-02 JSEA, JBM-F-10 Work Order & Site Prestart Check
- JBM-M-05 General Work Instructions (05) Risk Assessment Development / Review
- ❖ JBM-R-09 Training Register

14.1 Company Risk Register

The company risk register contains all risks associated with the company operations.

The site project risk assessments, hazardous substance risk assessments, plant risk assessment, design risk assessments, and job safety environmental analysis; risk-hazards and control measures are contained within this document.

JBM-R-02 Company Risk Register

Integrated Ma (IMS)	anagement System	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 45 Of 78



14.2 Project Risk Assessment (PRA)

Project risk assessments (PRA) are used to identify and control all hazards/risks on the project, including but not limited too; design, high-risk activities, health surveillance, and public safety, prior to commencement of the project, with continual reviews occurring throughout the project.

The project risk assessment (PRA) takes into account the entire project scope to ensure all control measures are in place prior to works commencing, including our Health, Safety, Quality and Environmental hazards identification, control measures, in accordance with our hierarchy of control assessment methodology.

Continual monitoring and reviewing the project risk assessment (PRA) occurs to ensure that the control measures are effective and current. If the control measures are not effective, a further risk assessment will be conducted on that area, the back of the PRA is used to record the written hazard and control measures.

The Project Manager/HSQE Officer with assistance from the HSQET Coordinator develops the project risk assessment (PRA) prior to mobilisation.

All personnel who are working on the site are made aware of the hazards-risks; control measures that are associated with the site-specific project risk assessment (PRA) at time of induction and daily through the daily briefing meetings.

External stakeholders are advised of any potential hazards in accordance with our HIRAC process of potential hazards, through but not limited to; variable notice boards displays, emails, meetings, phone calls and or bulletins.

❖ JBM-F-01 Project Risk Assessment (PRA)

14.3 Job Safety Environmental (JSEA) / Safe Work Method Statement (SWMS)

All work activities assessed as having Health, Safety, Quality and Environmental risks require the preparation and implementation of either a job safety environmental analysis (JSEA) or safe work method statement (SWMS), in accordance with relevant legislative, codes of practice, Australian Standards requirements.

JSEA/SWMS are required for all High-Risk Construction works (e.g working at heights are defined in relevant legislative, codes of practice, Australian Standards requirements.

JSEA/SWMS's are a means of briefly documenting the risks associated with a work task and incorporating the appropriate risk controls measures into a sequence of steps for doing the task safely.

The JSEA/SWMS's has been developed in consultation with site personnel and represent the safest and most practical way of carrying out work activity. All employees/subcontractors working on the specific activity-task are inducted into the JSEA/SWMS.

At the start of each shift the project team assesses the adequacy of the JSEA/SWMS to current site conditions/task and documents any new hazards not controlled by the existing JSEA/SWMS.

The checklist on the daily briefing form is used for this purpose.

	Integrated Management System (IMS)	Uncontrolled When Printed	Issue Date: August 2020
,	JBM-M-01 Version 3.1		Page 46 Of 78



It is the responsibility of the Project Manager and HSQE Officer with assistance from the HSQE &T Coordinator to ensure that the control measures adopted are monitored in both their implementation and also their ongoing adequacy for the activity.

Personnel undertaking the work are to inform Management if there are any proposed controls measures that are inappropriate.

Further reviews are conducted on a twelve (12) monthly basis, against the task or activity conducted, via a practical demonstration, reviews can also occur when there is a change to the task, an incident occurs or if new hazards are identified.

Subcontractors working on site are required to prepare their own JSEA/SWMS, which are subject to John Bedwell Management approval process.

JSEA/SWMS are is to be submitted to John Bedwell Management for a review by the Project Manager and HSQET Coordinator with assistance from the HSQET Coordinator using the SWMS/JSEA/Plan Review document the review contains, but not limited to the following criteria:

- Appropriate risk methodology in accordance with our hierarchal of control used,
- Identified appropriate legislative requirements,
- PPE Identified,
- Training,
- Senior Management endorsement.

This checklist can also be used as a guidance tool for in house development of the JSEA.

- ❖ JBM-F-02 JSEA, JBM-F-07B SWMS / JSEA / Plan Review
- ❖ JBM-M-05 Management Work Instructions (02) PRA/JSEA Development and Review

14.4 Risk Assessment Reviews (JSEA, SWMS, PRA)

Reviews are conducted on all SWMS, JSEA and or other risk assessments associated with this project on a continual basis to ensure all potential hazards are identified, with the correct control measure applied though our daily briefings, work order and site prestart check forms.

Further compliance checks are conducted for correct implementation of the SWMS / JSEA, conducted using the onsite compliance check. One check is conducted at least monthly concerning selected tasks identified by the Project Manager or HSQE Officer.

❖ JBM-F-09 Daily Briefing, JBM-F-10 Work Order and Site Prestart Check.

14.5 Design Risk Assessments

Design risk assessments are conducted for any new building or structure for design buildability in accordance with our HIRAC process.

This project does not require design risk assessment, as the project works currently is only repair and maintenance, which was identified through our internal project risk assessment conducted.

Integrated Ma (IMS)	anagement System	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 47 Of 78



Further guidance for conducting Design Risk Assessment is contained in the work instruction manual.

- JBM-F-01 Project Risk Assessment (PRA), JBM-F-05 Design Risk Assessment
- JBM-M-05 Management Work Instructions (05) Design Risk Assessments

14.6 Mobile Plant Risk Assessments

Plant Risk Assessments are conducted on all mobile plant, to identify any potential hazard/machine fault, in accordance with our HIRAC processes.

Plant Risk Assessments are reviewed annually, due to no modification made to any machine and that the machines are working locally, with regular checks through the daily checks and routine maintenance as per manufacturers requirements

Small plant –hand held items are assessed visually prior to use.

JBM-F-04 Mobile Plant-Equipment Risk Assessment (MPRA).

14.7 Safe Operating Procedures

Safe operating procedures are developed for non high-risk activities, to assist with the correct operational use of equipment, and the PPE requirements for the specific tasks-operation.

The Safe operating procedures are laminated and displayed near the task/equipment to provide further guidance of the correct use.

15 Environmental Incident Management

All environmental incidents are dealt with promptly to minimise any potential impacts. Likely environmental emergencies and incidents may involve:

- Fuel or chemical spills,
- Unlicensed discharge of pollutants to environment (air, water, noise, soil).
- Dumping of waste to an unauthorised site.

Any Incidents on site, which are likely to cause material harm to the Environment, will be immediately reported to the Client's Representative using the Environmental incident report form.

The Environmental Protection Authority (EPA) will be notified of pollution Incidents on or around the site which have occurred in the course of the works, in the following instances:

- The actual or potential harm to the health or safety of human beings or ecosystem is not trivial,
- The actual or potential loss or property damage (including clean up costs) associated with a pollution Incident exceeds \$ 10,000.
- ❖ JBM-F-23 Environmental Incident Report Investigation
- ♦ JBM-R-24 Environmental Aspects and Impacts Register

Integrated Management System		Uncontrolled When Printed	Issue Date: August 2020
(IMS)			_
JBM-M-01	Version 3.1		Page 48 Of 78



16 Accident / Incident Management

An incident is defined as:

Name	Definition
Incident:	Instance of something happening; an event or occurrence
Accident	Unfortunate incident that happens unexpectedly and unintentionally; typically resulting in damage or injury
Near Miss	Unplanned event that did not result in injury, illness, or damage – but had the potential to do so.

All incidents, accidents and near misses are to be reported immediately to the appropriate managersupervisor that is the first point of contact when an incident occurs on site.

The HSQE Officer investigates all incidents, for trends, ensuring that a correct corrective action is in place to prevent any re-occurrence, recorded within the incident, accident, and near miss register JBM-R-05.

Emergency contact numbers will be given to all personnel at their induction to the site, also displayed on relevant notice boards, site offices, company vehicles and pointed out during site inductions.

16.1 Notifiable Incidents

John Bedwell Management reports all notifiable incidents to the relevant authority, and principal contractor where applicable. Notifiable incidents include:

- Fatality, amputation of any part of the body,
- Serious vehicle, machinery accident,
- Serious head, eye, burns,
- Spinal injury,
- Serious lacerations.

When such an incident has occurred, senior management consider whether the site needs to be preserved for investigation by the relevant authority.

Reporting occurs as per timeframes detailed below:

Notifiable Incidents	Report to:	Timeframe
Serious incidents involving a death (fatality) or a serious injury or illness	NT Work Safe 1800 019 115, Client, PC Scheme Agent/Insurer	Verbal within 24hrs, Written within 48hrs

Integrated Management System		Uncontrolled When Printed	Issue Date: August 2020
(IMS)			
JBM-M-01	Version 3.1		Page 49 Of 78



Serious incidents involving injury or illness to non- workers at your work place	NT Work Safe 1800 019 115, Client, PC Scheme Agent/Insurer	Verbal within 24hrs, Written within 48hrs	
Other incidents involving an injury or illness where workers compensation is payable	Scheme Agent/Insurer	Within 48 hrs.	

17 Injury and Incident Investigation

All incidents are reported to the Project Manager or HSQE Officer and recorded on the incident/accident/ near miss report-investigation form.

The *Project Manager/Site Supervisor's* responsibilities are for all incidents:

- Ensure that emergency services are notified of emergency,
- Conduct the emergency evacuation onsite, ensuring that all personnel are accounted for,
- Securing the site from any potential contamination to enable a valid investigation to be conducted,
- Conducting the investigation with WHSQE Manager where required; such as a major injury,
- Review previous emergency drills for any indication of issues/nonconformances raised that have not yet been actioned,
- Inspect the site prior to recommencement of works commencing,
- Authorisation all personnel onsite to return to work once safe and the investigation has concluded.

It is the Project Manager/Site Supervisor to notify any appropriate control measures or rectifications including but not limited to; toolbox talks, pre start meetings, to all personnel onsite once the investigation has concluded.

Note: Refer to the JBM-M-03 Emergency Response Plan for further specific responsibilities.

The incident/ accident/ near miss report form details instructions on how to complete the form, (JBM-F-11).

Severity of incident levels include:

- **Minor:** Potential slips, trips falls.
- **Major:** Injury not requiring medical treatment.

Major and minor injuries, are the responsibilities of the Project Manager- HSQE Officer to rectify, and submit to the HSQET Coordinator for review.

- Extreme: Serious injury, dangerous incident, medical treatment required.
- **al:** Serious injury or illness requiring hospitalisation, possible fatality.

Integrated Ma (IMS)	nagement System	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 50 Of 78



Extreme / Critical incidents are to be investigated and reviewed by the Director / General Manager in conjunction with Project Manager / HSQET Coordinator. The relevant authorities (e.g. NT Worksafe - Worker Compensation) will also be notified as soon as practically possible. The company training need analysis identifies the minimum requirements for conducting this investigation.

Further guidance for conducting an investigation is with **JBM-M-05** Management Work Instructions (01) Conducting Incident, Accident, and Investigations.

The HSQET Coordinator and General Manager-Director / General Manager investigate all incidents.

17.1 Critical Incident

In spite of their complexity, most incidents are preventable by eliminating one or more causes. Incident investigations determine not only what happened, but also how and why.

The information gained from these investigations can prevent recurrence of similar, or perhaps more disastrous accidents. Accident investigators are interested in each event, as well as in the sequence of events that led to an accident. The accident type is also important to the investigator. The recurrence of accidents of a particular type, or those with common causes, shows areas needing special accident prevention emphasis. The HSQET Coordinator is responsible for ensuring that all investigations have been conducted. In the event of a serious accident or injury the Director / General Manager and HSQET Coordinator are required to conduct the investigation.

17.2 Critical Incident Process / Investigation

If a critical incident occurs at any location the Company Director, is responsible for notifying the family and relatives concerned. Direct direction may be given by the Company Director to the General Manager to act on their behalf in the Directors absence.

Release of information concerning the critical incident, to media, outside parties is not **allowed**, unless approved by the Company Director / General Manager.

The company engages counselling service provider to provide support, rehabilitation, counselling to any effect site personnel. The counselling service provider information is provided as part of the induction process, displayed within the emergency contact numbers.

Post critical incident review of the effectiveness of the critical incident response will be undertaken, this review will include senior management and any other personnel as required. This will be documented via *JBM-F-27B* form, as soon as practicable possible. Any nonconformances identified will be recorded within the incident, accident, near miss register and nonconformance register.

- ❖ JBM-F-11 Accident, Near Miss Report-Investigation
- ❖ JBM-R-05 Incident, Accident, Near Miss Register, JBM-R-06 Nonconformance Register.
- JBM-M-05 Management Work Instructions (01) Conducting Incident, Accident, Investigations.

Integrated Management System		Uncontrolled When Printed	Issue Date: August 2020
(IMS)			_
JBM-M-01	Version 3.1		Page 51 Of 78



17.3 Return To Work

John Bedwell Management is committed to the return to work of injured employees. John Bedwell Management ensures that injured employees (and anyone representing them) are aware of their rights and responsibilities – including the right to choose their own doctor and rehabilitation provider, and the responsibility to provide accurate information about the injury and its cause.

John Bedwell Management participates in the development of an injury management plan (external) to ensure that injury management commences as soon as possible after an employee is injured.

The HSQET Coordinator contacts the insurance company, who have the appropriately trained personnel to assist with the management of return to work/rehabilitation plan for the personnel involved.

The injured employee will be provided with suitable duties that are consistent with medical advice and are meaningful, productive and appropriate to the injured employee's physical and psychological condition. Depending on the individual circumstances of the injured employee, suitable duties may be at the same work place or a different work place, the same job with different hours or modified duties, a different job and may involve full-time or part-time hours.

18 Health Surveillance

John Bedwell Management has a responsibility to provide health surveillance to all its employees and subcontractors. A risk assessment process is conducted through the project risk assessment (PRA) to identify whether exposure monitoring is required for the following hazardous chemicals:

- Acrylonitrile,
- Arsenic,
- Benzene,
- Cadmium,
- Chromium,
- Creosote,
- Crystalline Silica,
- Isocyanates,
- Mercury,
- Methylene bis,
- Organophosphate Pesticides,
- Pentachlorophenol,
- Polycyclic aromatic hydrocarbons,
- Thallium.
- Vinyl chloride,
- Lead.

If any of the hazardous chemicals are identified onsite, appropriate control methods/ monitoring will be used, as per Schedule 14 - NT WHS Regulations 2011.

Further exposure monitoring is assessed within the *project risk assessment*, including but not limited to:

- Dust,
- Asbestos,
- Noise.

Integrated Ma	anagement System	Uncontrolled When Printed	Issue Date: August 2020
(IMS)			_
JBM-M-01	Version 3.1		Page 52 Of 78



- Vibrations,
- Gases, and,
- Fumes.

Ensuring that:

- The appropriate control measures are in place and effective,
- Evaluating and monitoring management strategies,
- Evaluating and implementing actions to the monitoring check results
- Detect adverse health conditions at an early stage,
- Provide feedback of the accuracy, health issues identified of the risk assessments, and,
- Identify and protect individuals from any risk to their health.

Results are recorded within the *project risk assessment* (PRA)/company risk register or incident, accident, near miss register if evidence of health problems is evident. All site personnel will be notified as soon as practically possible of any health monitoring required, through a daily briefings or toolbox talk meetings.

Additional work instructions have been developed for high-risk areas such as confined space and asbestos works. Medicals are conducted as a basis for pre employment currently.

Health monitoring will also be required where work is carried out by a worker using, handling, generating or storing hazardous chemicals where there is a significant risk that the worker will be exposed to a hazardous chemical other than a hazardous chemical referred to in Schedule 14, table 14.1 of the NT regulations, results from any health monitoring results will remain confidential and secure, within the company head office with only senior management employees having access.

Employees have access to their own medical information when required.

Only registered medical practitioners are engaged to conduct the medical assessments where health surveillance is required.

If any onsite monitoring is required including but not limited to dust, vibration, gases, fumes etc, the monitoring will be outsourced and conducted through competent / qualified experts, using the applicable-calibrated devices to conduct the monitoring requirements.

- **❖** JBM-F-01 Project Risk Assessment (PRA)
- ❖ JBM-R-02 Company Risk Register, JBM-R-05 Incident, Accident, Near Miss Register
- **♦** JBM-M-08 Asbestos Removal Plan (Where required)

19 Document and Data Control

Document and data control is to ensure that all employees and subcontractors engaged to carry out activities with John Bedwell Management use the correct versions of the correct documents for appropriate purposes and that all staff has access to current issue. This applies to all types of documents used for references by John Bedwell Management including, but not limited to, the manual sections, procedures, work instructions and all other company-related documentation.

The HSQET Coordinator is responsible for ensuring that the correct version is issued and that records are kept either electronically on the internal company server or via hard copies.

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
(IIVIS)			
JBM-M-01	Version 3.1		Page 53 Of 78



19.1 Document Approval

Prior to issue or release of documents for use, the HSQET Coordinator and or Company Director / General Manager have final approval of all documents of the management system. The document is approved by inclusion in the management system and will contain the company name, version number and date of approval.

All registers, specific Project management plans and the system manual are maintained by the HSQET Coordinator and must contain an index of all approved documents, version number and issue date. Company registers are kept in an electronic format (Excel or Word format). Project registers are in hard copy format. The original or first version of a document is assigned version 1.0. Legibility of documents will be ensured during the approval process.

19.2 Document Review, Update (Amendments) and Re-approval

All documents of the management system shall be reviewed by the Company Director / General Manager annually for suitability and evaluated in relation to the possibility of update after two years of implementation. If the documents are found appropriate and not updated, or modified after review, it will be recorded with the appropriate register, "*Re-approved*" and indorsed by the Company Director / General Manager and approved by either the HSQET Coordinator or Company Director / General Manager within the register. Documents can be amended/updated when required or at planned reviews.

19.3 Amendments issued

Documents are revised to the next level (1.1 and then 1.2, and so on). Only the Company Director / General Manager or the HSQET Coordinator as stated in "document approval" above should approve the revised document. Whenever a document is revised, all pages of the document bearing the same unique number are revised and a new issue date is marked. For the purpose of revision, document will mean a section of a manual, a procedure, a work instruction or a single form.

Any change or amendment to a document will be recorded within the applicable register. Any employee of the company can request amendments to the documents verbally or in writing. These are then subject to the Company Director / General Manager or the HSQET Coordinator's approval.

19.4 Identifying Changes and Current Revision Status

The nature of, and reason for changes are recorded in the appropriate register and maintained by the HSQET Coordinator. The version number, along with the revision number and date, identifies the revision status of a document. For example, version 1.0 states that it is version one and that no revision has occurred. Version 1.1 states that version one has been issued and that one revision has occurred.

Versions of current documents can be verified from the company's form, policy, work instruction register, amendment register, specific Project management plans and the system manual.

Live Documents are documents that are continually changing for example:

- Registers, and,
- JSEA's as they are reviewed continually for suitability.

Integrated Management System (IMS)		nagement System	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01 Version 3.1		Version 3.1		Page 54 Of 78



19.5 Document Issue

Approved copies of documents are issued to all concerned persons. Record of issue is maintained within the IMS system index and amendment register, specific Project management plans and the system manual.

Printed copies of a document, when distributed as per the distribution list, are considered as controlled copies by the HSQET Coordinator. All electronic copies are considered uncontrolled when printed.

Copies of forms used for records are made available at point of use but not issued as per this procedure. For example, the work instruction register is updated for new work instructions continually and will not be marked with 'controlled' as it is a live document. This is applicable for all live documents within the system.

Legibility of documents should be ensured at the time of issue of documents, as well as during all internal audits.

19.6 Obsolete Documents

Documents that become obsolete through replacement with later versions - or for any other reason - are removed from the electronic system and placed in an archive folder. Hard copy versions will be returned to the office for filing or destroying. Destroying of files is conducted via using a shredder. The shredded paper is then used within the garden.

All obsolete documents will be marked and identified through the issue date. Unwanted superseded copies will be destroyed. Where required, records will be maintained for specified periods.

After receiving the latest edition of any document, the receiver of the document should destroy the old copies. If they prefer to retain old copies, they should identify the document by stamping or watermarking the document **OBSOLETE**.

The HSQET Coordinator should keep one copy of previous versions of documents by appropriately identifying the document as either **OBSOLETE** or **SUPERSEDED**.

19.7 External Origin Documents

Standards that are released by external documents are external origin documents; these are controlled and monitored for current issue through conducting regular legislative checks refer **5.1 monitoring legislative requirements**, within this manual.

Other documents that are released by the external agencies, including client supplied transmittal plans, drawings, external client policies and procedures are external origin documents. External origin documents used by John Bedwell Management require periodic verification of their applicability (current revision status etc.) with the owner.

The HSQET Coordinator verifies the applicability (current revision status) of these documents with the owner annually and re-affirms the document or revises as necessary.

	anagement System	Uncontrolled When Printed	Issue Date: August 2020
(IMS)			
JBM-M-01	Version 3.1		Page 55 Of 78



A list of external origin documents and a record of verification is maintained in the external document register *(JBM-R-29)*. External documents used for projects are also identified within the Project management plan when required.

20 Control of Records

The Administration officer is responsible for ensuring that records are linked to the project or management activity when filed or archived. The files must be filed away either as a hard copy or scanned for electronic copies, allowing for easy access, removal and return to the same filing cabinet, or electronic file.

Records are archived when they have fulfilled their working life and disposed of when no longer required.

All employees with access to the files are equally responsible to ensure the records are kept in an orderly manner and are returned to their proper storage after use.

20.1 Access to Records

Anyone authorised and needing access to records is given full access, through the Company Director / General Manager or HSQET Coordinator. Any records removed from the files are carefully looked after and returned as soon as possible to their correct place. Any files that are removed from their normal location are done on a short-term basis only and the files returned, intact, as soon as possible.

The HSQET Coordinator identifies confidential records and ensures that these files are kept in a secure location with defined access. The HSQET Coordinator shall ensure that all internal audits, external audits, management reviews and training records are stored securely and correctly, either in hard copy or electronically within the company server.

20.2 Back-up Electronic Files

The company has an internal server, which are backed up with an external hard drive located at the office, and is taken away from the office daily to ensure no potential damage can occur.

This ensures the backup and safety of data should the computer or building be damaged by fire, for example.

20.3 Archive Records

Archiving should preferably be done on a project basis after job completion or on an annual basis for business-related files.

Records that are archived include financial, project, legal, personnel, and plant/equipment and health surveillance documents. When files are considered for archiving, an Administration staff member should review the records and cull unnecessary records from the file. Support for what files can be culled is through the HSQET Coordinator.

A full list of records to be archived are entered on the retention - archives register (*JBM-R-23*) with the necessary detail in regard to project, location of resource.

Integrated Ma	nagement System	Uncontrolled When Printed	Issue Date: August 2020
(IMS)			_
JBM-M-01	Version 3.1		Page 56 Of 78



The minimum retention time for records, for example OHS, financial, project and legal records, is five years. Retention of time for records has been established to identify all records and the timeframes to which they are stored.

When the archive period has expired, the need to destroy the records can be reassessed. Records are either destroyed or archived as long as required as per the Company Director / General Manager request and in accordance with legislative requirements.

21 Preventative Action and Corrective Actions

The HSQET Coordinator in conjunction with the HSQE Officer / Project Manager is to ensure continuing suitability, adequacy, and effectiveness of this Project Management Plan in relation to our Quality, Health, Safety and Environmental contractual obligations and legal requirements

21.1 Preventative Actions

Preventive actions can include but are not limited to:

- Training all company and site personnel to use the applicable preventative measure tools
 appropriate to the task. The tools should be used prior to conducting activities, or if the
 activity is of a high-risk nature, in accordance with the company risk matrix,
- Conducting management system internal audits and external audits,
- Conducting onsite inspections and audits,
- Incident/accident reviews and investigations,
- Conducting project risk assessments (PRA),
- Subcontractor evaluations,
- Pre-start machinery and vehicle inspections,
- Plant and equipment risk assessments,
- Ensuring JSEA are in place and accurate prior to machinery activity or high-risk work,
- Ensuring development of further instructions when required including work instructions or safe operating procedures,
- Issuing of lessons learnt alerts,
- Visual inspection of product prior to proceeding,
- Conducting 'witness and hold points' as per contractual obligations,
- Ensuring that preventative measures are in place to prevent potential issues of John Bedwell Managements business activities in all areas of operation,
- Calibration of equipment for accuracy,
- Ensure that the Project Manager / HSQET Coordinator has approved actions used, and,
- Monitoring the potential problem or preventative action put in place is conducted as per timeframe allocated by the appropriate / HSQET Coordinator to ensure that it is effective.

21.2 Non Conformance's and Corrective Actions

Nonconformance's can be raised for but not limited to, defects, rework, past mistakes, customer complaints, as well as system failures and audit results.

 This can be raised by completing a corrective action-nonconformance report/investigation or contacting the HSQE Officer/ HSQET Coordinator to record the nonconformance in company nonconformance-corrective action register,

Integrated Management System (IMS)	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01 Version 3.1		Page 57 Of 78



- The root cause of the nonconformance shall be identified and actions taken to prevent reoccurrence of the issues,
- The nonconformance corrective action register will be monitored by the HSQE Officer/HSQET Coordinator to ensure that the responsible person for the nonconformance has closed out the nonconformance within the timeframe specified.

The HSQE Officer / Coordinator is responsible for ensuring that the relevant personnel are assigned with the task of developing the actions required.

This will include an appropriate timeline to be followed for developing and trialling the action items as required.

Any documentation, including amendments to current procedures, forms or additional instructions is prepared for review, and approved by General Manager / Director / General Manager

After the General Manager / Director / has approved the documents, the HSQET Coordinator issues the revised documents to all affected personnel, making sure they are aware of the changes.

- **♦** JBM-F-12 Corrective Action-Nonconformance Report/Investigation
- JBM-R-06 Nonconformance / Corrective Action Register

21.3 Continual Improvement

All staff / subcontractors are encouraged to submit ideas that might improve operations, service to clients and client satisfaction or improvements to safety and environmental compliance This is achieved by filling out the corrective action-nonconformance report-investigation and forwarding it to the HSQET Coordinator.

The HSQET Coordinator will then populate the company nonconformance-corrective action register or business improvement log, depending on the description detailed within the form, with the purposed action to implement the business improvement or rectify nonconformance, allocating a responsible person and timeframe to close out the action.

- **♦** JBM-F-12 Corrective Action-Nonconformance Report/Investigation
- JBM-R-06 Nonconformance / Corrective Action Register

21.4 Monitoring and Review

The Company Director / General Manager and HSQET Coordinator make appropriate arrangements to review and monitor the revised procedures and their implementation to ensure that the expected outcomes are being achieved and that the changes have been effective.

Sufficient time should be allowed for this to be effective. When satisfied the improvements made are working successfully, HSQET Coordinator will fill in comments in the corrective actions status area company nonconformance-corrective action register.

22 Purchasing

John Bedwell Management ensures that all purchased product (including subcontractor's work) conforms to contract and our IMS requirements by:

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 58 Of 78



- Pre approving all suppliers and purchased items; including a risk assessment contained within the suppliers review form (JBM-F-28 Supplier Review),
- Raising a purchase order (P/O), if required
- All orders are ordered through the Project Manager / Supervisor.

To ensure our Quality, Health, Safety and Environmental compliance, all purchased products are handled, stored, combined with other products, installed and used in accordance with the manufacturer's recommendations.

Approved suppliers are recorded within our internally program **M-Files**, no new supplier will be added unless the Supplier Review has been completed.

All purchased products (including Subcontractor's work) are subject to verification process, to ensure there is no introduced hazard/risk to the workplace and that the product conformance to contract requirements.

All materials and equipment used for the works will be of the highest quality and will be entirely suitable for the purpose they were designed.

Goods delivered to the workshop or site is subject to inspection by a project team member who takes delivery of the goods and checks the delivery with the invoice or delivery docket.

22.1 Supplier Review

Periodically, approved suppliers are reviewed as required, at minimum 12 monthly, to ensure their ongoing ability to meet John Bedwell Management HSQE system requirements, if the suppliers are still current they will remain within the **M-Files**, if the supplier is non longer required or non compliant they will be removed from the **M-Files** system.

This review includes HSQE aspects and can include controls, workmanship, account management, pricing, product delivery, communication, and service-flexibility, old records of reviews only need to be dated and signature to provide evidence of a new review completed.

22.2 Control of Process Changes

When a significant change is made to an established process (e.g. new machine), a risk assessment is conducted of the first units(s) processed after the change.

Employee qualification(s) and re-qualification requirements are established for all applicable processes; these requirements, at a minimum, address experience, training and demonstrated skills.

22.1 Production Control/Service Provision

The Management team meets to discuss project progress for all projects, which include but not limited to variations, testing results, defects, problems and client satisfaction.

These meetings occur when required, but no less than monthly within the management meetings or toolbox talks.

Integrated Ma	anagement System	Uncontrolled When Printed	Issue Date: August 2020
(IMS)			_
JBM-M-01	Version 3.1		Page 59 Of 78



Special processes are monitored, controlled, and maintained in compliance with contractual requirements. Action items are either recorded within the business improvement log or corrective action register.

22.2 Product Validation / Testing / Calibration

Product compliance with standards and/or specifications is confirmed through design verification tests. This is conducted prior to the project release.

As well as the test and measurement equipment suitable to the product and/or process, contractual obligations define the test methods and equipment, and verify that products function as designed.

Tests can include, but not limited to, electrical testing, dust monitoring (Asbestos), calibration testing of equipment (which is conducted externally) and visual inspections, which are also used to ensure that a quality product is achieved.

Calibration tests if required is conducted using accredited, (where required) qualified and approved suppliers, ensuring that that the equipment has been maintained as per manufacturers requirements, legislation, codes of practice, and Australian Standards, evidence is provided within the document invoice from supplier.

JBM currently does not have any Health and Safety equipment requiring calibration.

All equipment that needs to be calibrated (for example laser, breath testers) is to be calibrated prior to use, to ensure accuracy (*JBM-R-26 Calibration Register*). All equipment should be tagged out and placed in the 'Out of service area' until the calibration test has been completed.

22.3 Product Preservation

Products are handled and delivered using methods that protect the integrity of the product. This includes the transportation of equipment.

Employees who have direct contact with transportation are trained appropriately in the loading (securing) and unloading of goods or equipment where required.

Only appropriately trained and licenced operators will be able to use the forklift if required.

- ♦ JBM-F-12 Corrective Action-Nonconformance Report/Investigation, JBM-F-28 Suppliers Review Checklist
- JBM-R-06 Nonconformance / Corrective Action Register, JBM-R-26 Calibration Register

23 Inspection and Testing:

To demonstrate conformity of products delivered to specified requirements, inspection is carried out as follows:

23.1 Receiving Inspections of Incoming Goods

Before supplied product is used in the project works an inspection is carried out, checking that the product delivered matches the invoice or delivery document.

Integrated N	lanagement System	Uncontrolled When Printed	Issue Date: August 2020
(IMS)			
JBM-M-01	Version 3.1		Page 60 Of 78



Ensuring that purchased product conforms to what has been ordered from the supplier.

23.2 In-Process Inspection

In process inspections are conducted through our site inspections, site audit results and or clients feedback reports-inspections.

23.3 Final inspection

To demonstrate conformity of the work to specified requirements a final or acceptance inspection is carried out.

Final inspection is carried out on the project, to verify that finished work conforms to specified requirements.

Any nonconformity is managed in accordance with the nonconformance procedure. The Project Manager is responsible for the final check that all inspections have been completed.

- **❖** JBM-F-12 Corrective Action-Nonconformance Report/Investigation
- ❖ JBM-F-17 Weekly HSQE Site Inspection
- ❖ JBM-F-19 Monthly Site Audit
- JBM-R-06 Nonconformance / Corrective Action Register

24 Plant and Equipment

John Bedwell Management ensures that plant and equipment is inspected and maintained in accordance with the relevant regulatory inspections / registrations, Australian Standards and manufacturers' maintenance and servicing requirements specific the plant / equipment requirements, and commissioning requirements prior to use on site.

Equipment Prestart inspections have been developed for our mobile plant in accordance with the manufacturer's operational requirements/checks.

The inspection and maintenance history of each item is documented and recorded and stored at company office.

Equipment Prestart inspections are conducted on a daily basis, where an issue has been identified the Plant Defect & Equipment Report/Investigation is actioned, for scheduling repairs/maintenance.

All prestart inspections / fault reports are notified to the administration staff and actioned with the workshop where required. Plant maintenance logs are made available to relevant parties on request through accessing the JBM-R-08 Maintenance Register.

The Site Supervisor or Operator in his absence is responsible for notifying Head Office with the Plant Defect & Equipment Reports-Investigations, which then will be actioned by the administration department to rectify the fault or schedule required maintenance.

All mobile plant requires a full risk assessment to be carried out before use on site.

	anagement System	Uncontrolled When Printed	Issue Date: August 2020
(IMS)			
(IMS) JBM-M-01 Version 3.1			Page 61 Of 78



Operations of the mobile plant will take into consideration the operators manual, outcomes from the plant risk assessment, site specific requirements and the need for Rops & fops protection. Which will flow through into generation ofthe PRA & JSEA's & Sop's

All plant and equipment is subject to an onsite inspection prior to the commencement of any works on the project works, using the Equipment Authorisation Checklist (JBM-F-16), for including but not limited to ROPS Cabs, Seat belts, Flashing light, Oil leaks, Cleanliness, last service and hours recorded.

Use of Mobile Cranes

Where mobile cranes are to be used:

- Lift plans must be developed in accordance with the relevant Legislation, Code of Practice & Australian Standards
- Ground conditions must be taken into consideration before starting up a mobile crane
- Lifting of workers is not permitted
- Lifting of materials can only be conducted by Qualified personnel using lifting equipment that has been inspected and tagged by qualified personnel (See JBM-R-31 for the list of company owned equipment) according to current Codes of practice, Standards & Legislation
- Contractor's lifting and rigging equipment will be managed when coming onsite by JBM-F-16 Equipment Authorisation Checklist

Where commissioning is required for the item of plant, identified through using the Equipment Authorisation Checklist, a commissioning certificate is to be obtained to ensure that the item has been commissioned correctly in accordance with manufacturers requirements prior to use.

Equipment Authorisation Checks are valid from 6-12 months dependant on the plant-machine time frame onsite, and condition of the equipment.

If any plant / equipment has been identified through the inspection as not being compliant, the equipment will not be able to be used until the issues have been rectified, another inspection is required before the plant/equipment will be allowed to be operated onsite.

If any Hire equipment is needed for the project the same authorisation checklist is required to be completed.

Lifting equipment associated with the plant can be found in WAH equipment register (JBM-R-31). Working at heights and rigging equipment are inspected according to the Work Health & Safety Legislation and Codes of practice on a six monthly basis using the RGBY system and recorded in the WAH equipment register (JBM-R-31).

Emergency Procedures for plant are identified within the site emergency response plan.

- **❖** JBM-F-13 Equipment Prestart Checklist (PDF),
- ❖ JBM-F-14 Plant Defect & Equipment Reports-Investigations
- **❖** JBM-F-16 Equipment Authorisation Checklist
- JBM-R-08 Maintenance Register, JBM-R-26 Calibration Register

Integrated Ma	anagement System	Uncontrolled When Printed	Issue Date: August 2020
(IMS)			_
JBM-M-01	Version 3.1		Page 62 Of 78



25 Electrical Equipment

All electrical equipment including leads, portable power tools, junction boxes and earth leakage, or residual current devices are inspected and tested by a suitably qualified person, in accordance with the applicable legislative requirements and labelled with a tag of currency before being used on site.

Electrical equipment brought onto site is listed within our Company Electrical Equipment Register.

❖ JBM-R-27 Company Electrical Equipment Register

26 Working with Asbestos

Asbestos removal is not part of the project, it can be found within the project components, e.g. re fixing or installing new household item fixtures. Identification of Asbestos contained house is detailed in *Appendix C.*

A JSEA has been implemented for Working with Asbestos (JBM-F-02-05 Working with Asbestos), with further assessment contained within our project risk assessment.

If removal is required, we will engage an external qualified / accredited company to develop and implement the removal plan, this will be communicated to all stakeholders onsite; through toolbox talks, meetings, emails and or phone calls where required.

Further monitoring may be required, but limited to such as dust monitoring. Where monitoring is required we will only engage approved JBM external qualified person/s or companies

Further guidance for dealing with is detailed within JSEA.

- ♦ JBM-F-01 PRA, JBM-F-02-JSEA-05 Working with Asbestos, JBM-F-35 Asbestos Removal Plan Review. JBM-F-36 Asbestos A Clearance Certificate
- ♦ JBM-M-08 Asbestos Removal Plan, JBM-M-08A Asbestos Management Plan

27 Working at Heights

JBM Management uses our company HIRAC process to identify & assess the potential activities on the project where a person may fall from height or there is the potential for falling objects, the risks / hazards are identified/ controlled and recorded within the Project Risk Assessment.

The following processes and requirements are required when working at heights.

Task specific (JSEA's) are developed, in conjunction with workers to ensure the relevant risks/steps have been accurately identified, with appropriate controls. The JSEA is available at the site location and or through accessing DROPBOX.

Any step changes/ new hazards are recorded within the JSEA, reviews of the JSEA occur daily using the JBM-F-10 Work Order / Site Pre Start Check.

The project manager ensures that any systems/structures are installed and inspected to prevent falls, according to the specifications required by the manufacturer and the relevant Australian Standards including but not limited the following standards

AS/NZS 1891 industrial fall arrest systems

Integrated Ma (IMS)	anagement System	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 63 Of 78



- AS/NZS 4481 industrial rope access systems
- AS/NZS 5532 height safety for roof anchors
- AS/NZS 4494 temporary edge protection
- AS/NZS 1892 Portable ladders

Equipment being used or installed including but not limited to, fall restraint/fall arrest equipment, is only to be used by trained persons.

All Equipment associated with working at heights has been purchased in accordance with our purchasing process to ensure that all products have been designed engineered and certified, in accordance with relevant Australian standards, through our approved purchasers risk assessment conducted.

All equipment is appropriately maintained/inspected, and attached to points that are certified to be adequate to sustain the potential force of a falling person in accordance with all-relevant legislation, manufacturers instructions, Australian Standards & codes of practice, verified through the use of the working at heights permit.

Onsite we require a Working at Heights Permit *JBM-F-38* and Working at Heights Rescue Plan *JBM-F-39* to be filled out and signed off by the project manager or supervisor. This is to ensure that safe access/egress to/from areas where work at height is conducted and all associated working at heights equipment is within the tag inspection timelines and installed/being used correctly.

Controls for WAH will be developed and implemented from the information in the completed WAH Permit *JBM-F-38* & WAH Rescue Plan *JBM-F-39* along with site inspections with controls recorded in the JSEA.

Verification is conducted through inspections conducted daily in accordance our HIRAC methodology ensuring that the correct control measures are implemented and controlled.

The company working at heights equipment register, further details when items are to be re-tested.

The following color code chart is used to identify when testing is required:

Red	December - February
Green	March - May
Blue	June - August
Yellow	September - November
Orange	January - June
White	July - December
Black	Yearly
Grey	2 Year
Burgundy	5 Year

The use of ladders is the last resort when selecting work platforms for any activities. Where ladders are the only option for works, platform ladders are to be used wherever possible, controls are in place to manage the risks associated with ladders, identified within the working at heights permit prior to the commencement of works.

Emergency scenarios for working at heights are detailed within the project emergency response plan.

All personnel working at heights will be trained for this competency through an accredited RTO, with the appropriate course verification of competency is within our TNA/ Training Register JBM-R-09.

❖ JBM-F-24B Working at Heights Skills Assessment, JBM-F-39 Working at Heights Permit.

Integrated Management System		Uncontrolled When Printed	Issue Date: August 2020
(IMS)			
JBM-M-01	Version 3.1		Page 64 Of 78



- JBM-M-03 Emergency Response Plan and Evacuation Map.
- JBM-R-08 Maintenance Register, JBM-R-31 Working at Heights Equipment Register, JBM-R-26 Calibration Register

28 Excavations / Permits

The company HIRAC process is used to identify the potential activities/hazard/risks on the project associated with but not limited to excavations, plant and equipment, possible falls into the excavations, identification of services adjacent to works, communication with the asset owners, with the identified controls consistent with our HIRAC detailed with the Project Risk Assessment and relevant JSEA.

For this project prior to any excavation works a Permit to excavate is conducted through the Nhulunbuy Corporation; included within this permit is Dial Before Dig. The permit is available on the site where excavations are required.

Areas that are not under the Nhulunbuy Corporation will require JBM to conduct internal excavation permit, prior to conducting any excavation works, including Dial Before Dig.

Excavation over 1.5 meters deep will require either benching / battering or shoring. Refer to the Project Risk Assessment and relevant JSEA for the tasks.

All record of any excavation permit / dial before dig is also available through accessing either the hard copy at company office or DROPBOX.

Emergency scenarios for excavation, is detailed within the project emergency response plan.

- JBM-F-32A External Excavation Permit (Nhulunbuy Corporation), JBM-F32B Internal JBM Excavation Permit
- ❖ JBM-M-03 Emergency Response Plan and Evacuation Map.

29 Work Instructions and Safe Operating Procedures (SOP)

In addition to the Integrated Management plan, work instructions/sop's are available to assist all personnel on site to adhere to our requirements and to ensure compliance with our site specific, legal and regulatory obligations and requirements.

Work instructions are advised to all personnel working on site, relevant to their tasks or position requirements, prior to the commencement of work.

Instructions have been developed into the following:

- JBM-M-05 Management Work Instructions Additional information for senior management,
- JBM-M-07A Site General Safe Operating Procedures, for all personnel onsite, applicable to their specific related tasks,

Additional work instructions/sop's may be required to ensure compliance; this is determined by results from our internal audits. After reviewing the inspection / audit results the Managing Director / HSQET Coordinator / Project Manager may introduce further work instructions along with training.

Integrated Managem (IMS)	ent System	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01 Version	on 3.1		Page 65 Of 78



Any complaints concerning any aspect of the company are registered, investigated and recorded within the corrective action, nonconformance report - investigation (JBM-F-12).

30 Traffic Management Plan

External Traffic management plans are not required for this project works currently.

If Traffic Management Plans is required for works conducted, we will outsource the development through an external provider, accredited, authorised to develop the plans (WZ1). Requirements for a traffic management plan will be identified within the Project Risk Assessment (PRA).

The external provider will also be engaged to implement the plan, with accredited traffic control personal (WZ2/3).

30.1 Pedestrian and Vehicle Movement Plan

John Bedwell Management is committed to ensuring the safety of its own workforce, subcontractors, visitors and members of the public at any work sites under its control.

Currently there is no site requirement for a plan. The town map is used for direction around the town to specific location including but not limited to Hospital, Police, and Ambulance. NT road rules are applicable whilst driving on public roads.

Around the workshop, there is an emergency response map, providing guidance to vehicle parking and flow of traffic.

No qualification is needed to implement these plan/s. Where traffic flow / vehicle parking and or pedestrian flow *JBM-F-35* is to be used.

- ❖ JBM-F-01 Project Risk Assessment (PRA), JBM-F-35 Pedestrian / Vehicle Movement Plan
- ❖ JBM-M-03 Emergency Response Plan and Evacuation Map.

31 Hazardous Substances and Dangerous Goods

All hazardous substances brought to our workshop and sites are stored, handled and transported in a manner that meets relevant legislative requirements and minimises the risks associated with the substance.

No products or substances, including chemicals or fibrous materials, are brought to the any site without a current safety data sheets.

The company hazardous substance register contains a register of all substances used for the company operations.

Project site hazardous substances are recorded within the specific project hazardous substance register.

Risk assessments are conducted on hazardous substances to ensure that the correct control methods are placed for the use of the substance, and if any health monitoring is required for hazardous substances as per NT WHS Regulations schedule 14, refer (section 27, pg. 55), in accordance with our risk methodology.

Integrated Management System		Uncontrolled When Printed	Issue Date: August 2020
(IMS)			_
JBM-M-01	Version 3.1		Page 66 Of 78



All hazardous chemicals are stored in the original containers with the label intact at all times.

Decanting sometimes will occur due to the volume of the hazardous substance purchased, the decanting storage device, are defined with the appropriate substance labelling on the outside of the container and stored as per the safety data sheet (SDS).

Relevant staff/subcontractors are trained on how to use hazardous substances / SDS, through acknowledgement / signing onto the hazardous substance JSEA.

Spill Kits are located at the company office / workshop; identified on the site evacuation plan

- ❖ JBM-F-03 Hazardous Substance Risk Assessment
- JBM-R-07A Company Hazardous Substance Register, JBM-R-07B Project Hazardous Substance Register

32 Environmental Protection Requirements / Identification of Environmental Aspects

The HSQET Coordinator shall ensure that all environmental aspects (defined as the cause of impacts to the environment) and impacts are satisfactorily assessed, controlled and monitored.

New developments, changes to company activities, or purchasing new products or services will require a new assessment to be conducted to ensure that the environmental aspects and impacts associated have been controlled with no further environmental impact.

John Bedwell Management conducts assessments of any activity that will cause an impact (either positive or negative) to the environment. This is identified within the JSEA or SWMS, along with re-checking using the environmental checklist and monthly workshop inspections. All new aspects are recorded in the environmental aspects and impacts register.

This includes all aspects from workshops, maintenance facilities, on construction sites and in the office. When identifying aspects, consideration is given to potential emergency situations, as well as normal and abnormal operating conditions.

Significant Environmental Impacts are:

- Spills (diesel, oil)
- Storage diesel,
- General Waste,
- Pollution,
- Asbestos.

32.1 Identifying Impacts

Environmental impacts are the consequences arising from environmental aspects. It is possible that from one aspect there may be many impacts on the environment. Impacts to all segments of the environment should be considered, including positive impacts.

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 67 Of 78



32.2 Significant Environmental Aspects

Significant environmental aspects are identified and reviewed through using project risk assessment (PRA), job safety environmental analysis (JSEA) or project inspection checklist, in conjunction with our risk matrix. In relation to extreme environmental aspects, identification of significant environmental aspects is conducted using the work instruction.

The HSQET Coordinator and Company Director / General Manager reviews the company risk register, PRA's, JSEA's, work instructions to ensure that all significant environmental aspects have been identified and controlled.

32.3 Environmental Risk Control

Where a risk to the environment has been identified, controls must be introduced to reduce the level of environmental impact acceptable level.

There are five levels of risk control:

- Discussion at the daily briefing/toolbox meeting for a very low risk,
- Environmental checklist.
- Work instructions, Significant environmental aspects and impacts/training,
- Hazard register, and,
- Implement integrated HSQE Project management plan and/or an Asbestos removal plan.

Refer: Risk Matrix with hazard identification. (16.8.3)

❖ JBM-F-23 Environmental Incident Report-Investigation

33 Audits and Inspections

The HSQET Coordinator coordinates all audit-related activities associated with the management system.

HSQE system audits are set at regular intervals to ensure all aspects of the system are reviewed.

The frequency of the audits is based on the results of previous audits that include but not defined to nonconformances, accidents and incident trends, injury and illness trends and the significance of individual system activities. The minimum audit cycle is once per calendar year. Findings from any audit conducted are recorded within the company corrective action register.

Management system internal audits are conducted for each standard (HSQE), with an appropriately trained auditor (Exemplar Global).

Site Audits are conducted monthly on all our project sites, that includes OHS, Environmental and Quality areas, Project management plan, Emergency plan and site risk assessments the minimum training required to conduct these audits is detailed within the company Training register (*JBM-R-09*).

The HSQET Coordinator selects the internal scope prior to the audit, based on previous audit reports and non-conformances raised in conjunction with the appropriate standard.

Integrated Management System (IMS)	Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01 Version 3.1		Page 68 Of 78



Internal audits use the relevant Australian/International standard as reference; the audits are conducted against internal processes.

- ❖ JBM-F-09 Daily Briefing, JBM-F-12 Corrective Action-Nonconformance Report Investigation, JBM-F-17 Weekly HSQE Site Inspection, JBM-F-19 Monthly Site Audit, JBM-F-26 Lesson Learnt, JBM-F-29 Internal Audit QMS, EMS, OHS
- JBM-M-05 Management Work Instructions (03) Conducting IMS Audits and Inspections
- ❖ JBM-R-06 Nonconformance / Corrective Action Register, JBM-R-22 IMS / Project Schedule

33.1 Site Audits

The HSQET Coordinator / Project Manager is responsible for ensuring that monthly project audits are conducted including, but not limited to the HSQE Project management plan, Emergency response plan, risk assessments.

The audits will involve a review of all Quality, Health, Safety and Environmental documentation, reports, records and inspection results with respect to the requirements of the HSQE Project management plan.

The HSQET Coordinator / Project Manager shall determine any nonconformance against the HSQE Project management plan requirements and initiate the appropriate corrective action.

The HSQET Coordinator / Project Manager will check that all corrective actions are completed within the register and/or that the nonconformance /corrective action reports are signed off in a timely manner.

All results of the audit will be communicated in the monthly report to the Client where required.

33.2 Site Inspections

These inspections aim to identify any systematically occurring hazards and system failures within the work place and to minimise risks to HSQE. Workshop and Site inspections are conducted by an appointed person determined by management, or with a team consisting of management, subcontractors and workers, if available.

This may constitute any or all of the above. The inspection team is formed based on the works being performed. People experienced/trained in the area of tasks performed on site will make up the inspection team.

The site hazard inspection considers:

- High risk activities- areas of concern,
- First aid facilities,
- Emergency Equipment e.g. fire extinguisher,
- PPE,
- Asbestos.
- Excavation.
- Electrical activities,
- Plant and equipment,
- External stakeholders,
- Subcontractors.

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 69 Of 78



- General site safety instructions,
- Traffic management,
- Environmental conditions,
- Procedures and work instructions training,
- Identification of hazards in the work environment,
- Improvements to health and safety practices and procedures,
- Measurement of HSQE legislative compliance, and,
- Maintenance of employee involvement and participation in health and safety activities.

Once a hazard or nonconformance within the system has been identified, it is assessed (scored) as per the risk matrix and escalated to the Management level responsible for authorising control.

This is recorded either by submitting a nonconformance report to be entered into the company corrective action register or directly into the corrective action register by the HSQET Coordinator.

Results of site inspections are communicated to the necessary stakeholders via HSQE lesson learnt alerts, pre-shift briefing, toolbox talk or safety meeting, conducted by the Company Director / General Manager when in attendance or the Project Manager /HSQET Coordinator.

If the hazard impacts on a work instruction, safe work method statement or safe operating procedure, a review will take place by the HSQET Coordinator.

Six-monthly inspections are completed for our amenities, and offices located at our head office.

Any actions resulting from the inspections are promptly resolved and recorded as nonconformances. The HSQET Coordinator ensures that project performance is evaluated on a regular basis and includes a review of inspections records, complaints, inquiries received, incidents and accidents.

33.3 External Audits

External audits of the management system are conducted through external company on minimum 12-monthly cycles.

Management review the audit results and an action plan is produced to correct any problems, which may have occurred.

33.4 Audit Results

The Management team reviews the results, including strengths, opportunities for improvement and suggestions from internal and external audits.

Discussion includes the possibility of corrective or preventive actions, as well as continual improvement opportunities.

A summary of internal and external audit activities (results, findings, observations and improvements) is reviewed as part of the management review.

Integrated Management System		Uncontrolled When Printed	Issue Date: August 2020
(IMS)			_
JBM-M-01	Version 3.1		Page 70 Of 78



- ❖ JBM-F-09 Daily Briefing, JBM-F-12 Corrective Action-Nonconformance Report Investigation, JBM-F-17 Weekly HSQE Site Inspection, JBM-F-19 Monthly Site Audit, JBM-F-26 Lesson Learnt, JBM-F-29 Internal Audit QMS, EMS, OHS
- ❖ JBM-M-05 Management Work Instructions (03) Conducting IMS Audits and Inspections
- ❖ JBM-R-06 Nonconformance / Corrective Action Register, JBM-R-22 IMS Schedule

33.5 HSQE System Reporting

HSQE system reporting is conducted on a monthly basis or as the project documents demand for all projects using the HSQE system recording register.

The register is complied through the evaluation and collection of hazards, incidents, man hours, accidents, near misses regarding OHS/environmental components and system failures.

The HSQET Coordinator, enters the relevant information into HSQE system recording register, this is reviewed monthly by the HSQET Coordinator to identify any trends or areas of concern.

The information is compiled by the HSQET Coordinator and reviewed with the senior management team to ensure that appropriate actions are taken regarding the concerned areas that have been raised this will be done via the managers monthly meeting.

The results from the HSQE recording register are notified to the site supervisor whom, will notify personnel through either the morning pre start meeting or a toolbox meetings.

Appropriate actions are recorded within the non-conformance / corrective action register.

- ❖ JBM-F-27 Management Review Agenda
- ♦ JBM-R-06 Nonconformance / Corrective Action Register, JBM-R-28 HSQE System Reporting & Weekly Man-hours Register

34 Management Review

John Bedwell Management hold regular management reviews, as determined by the Company Director / General Manager but at least once per calendar year, to continually try and find ways to improve the company and its operations.

The HSQET Coordinator is responsible for arranging the reviews.

Senior Management is involved in this management review including, Company Director / General Manager, HSQET Coordinator, Project Manager and any other personnel as required by the Company Director / General Manager.

The suggested time for the annual review is after an internal audit is conducted, or after a certification audit has been conducted.

JBM-F-27 Management Review Agenda

Integrated Management System		Uncontrolled When Printed	Issue Date: August 2020
(IMS)			
JBM-M-01	Version 3.1		Page 71 Of 78



34.1 General Meetings

John Bedwell Management conducts general meetings on a quarterly basis to review but not limited too; general business, general business activities, complaints, management system issues, incidents, accidents, near misses, objectives/targets and project compliance.

The Company Director, General Manager, Business Manager, Project Manager, HSQET Coordinator, and any other personnel as required by the Company Director / General Manager are involved in these meetings, conducted using the either the general meeting agenda or toolbox meeting form.

JBM-F-27B Monthly Management Agenda

34.2 Business Improvement

In order to maintain continual improvement of the business, there is collective feedback on results through a variety of channels. Processes, inspection and test reports, supplier suggestions, internal and external audit reports, client feedback, staff suggestions are reviewed for continual improvement opportunities.

Employees in all operational areas, and at all levels, have the authority and ability to propose and seek implementation of continual improvement activities.

Business improvement meetings within the general meetings include evaluation of OHS, environmental and quality aspects within the company.

These meetings are usually taken place in the form of "toolbox meetings, daily briefing" conducted at the office or site location, with the records given to the HSQET Coordinator for entering into either the corrective action register or business improvement log.

- ❖ JBM-F-31 Client Feedback, JBM-F-09 Daily Briefing, JBM-F-09B Toolbox Meeting
- JBM-R-06 Nonconformance / Corrective Action Register, JBM-R-25 Business Improvement Log

35 Emergency Response Procedures

John Bedwell Management ensure that all emergency situations are identified, with the appropriate emergency equipment including but not limited to fire extinguishers, first aid kits, spill kits are within current test date and fully stocked in case of an emergency recorded within the emergency equipment register.

The Project risk assessment conducted prior to the commencement of a project identifies the potential emergency situations; a risk control process is conducted in accordance with our company HIRAC process to assist with the development of the plans. The risks are further transferred to our company risk register.

Minimum training requirements for conducting this assessment is detailed within the company Training register.

- **❖** JBM-F-06 Emergency Equipment / Hazard Assessment
- JBM-R-09 TNA / Training Register, JBM-R-02 Company Risk Register

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 72 Of 78



35.1 Company Office / Workshop Emergency Plan

John Bedwell Management has developed an emergency response plan (*JBM-M-03*) for the workshop/office complex.

The Company emergency response plan is displayed in the workshop and office; this is communicated to all personnel onsite through the inductions.

Emergency drills (*JBM-F-20*) are conducted *annually* at the *workshop/office* to ensure that the appropriate procedures are working in relation to all emergencies, dependant on the emergency drill findings the drills may be more frequent.

The Company Emergency plan is reviewed on an annual basis at a minimum, or when an accident or emergency has occurred.

Emergency Drills conducted identifying any possible deficiency, is recorded within the company corrective action register for action / review to ensure that the process in place are effective.

- ❖ JBM-F-20 Emergency Drill
- ❖ JBM-R-06 Nonconformance / Corrective Action Register

35.2 Project / Site Emergency Plans

Project (Site) emergency response plan and evacuation maps (JBM-M-03) are developed for each project.

Prior to the implementation of emergency equipment or the development of the plan, a project risk assessment (*JBM-F-01*) and project emergency-equipment / hazard assessments (*JBM-F-06*) are conducted. This is to ensure that all potential emergency situations have been identified with the appropriate emergency equipment

The emergency plans are located at the site office, or dependant on the size of the project in the supervisor's vehicle, containing emergency contact numbers and procedures.

Emergency numbers are also displayed on relevant notice boards and or within company vehicles, which are communicated during the site inductions. *Project* Emergency drills *(JBM-F-20)* are conducted on a *6 monthly basis onsite*; dependant on the emergency drill findings the drills may be more frequent.

Spill kits are kept within the service vehicles or at the work site.

Project Emergency plans are reviewed on an annual basis at a minimum, or when an accident or emergency has occurred. If an emergency or accident does occur further reviews-investigations will be conducted on our IMS system to ensure that the current system in place is effective and valid for potential-real emergencies or incident/accident situations.

35.3 Emergency Equipment

Emergency equipment required for our sites is dependant on location, size of the crew, potential hazardsemergencies identified, this is identified at the start of the project through conducting an emergency equipment/hazard assessment (*JBM-F-06*).

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 73 Of 78



Through this identification collected and assessed the emergency response plan is developed for each location specifically.

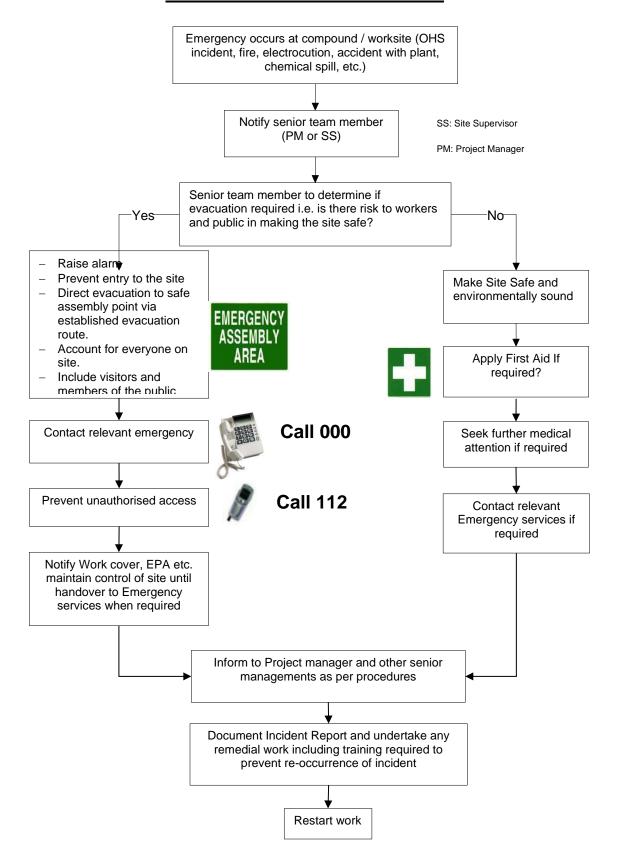
Emergency equipment that is used on our project is recorded within the applicable register.

❖ JBM-R-13 First Aid Kit & Spill Kit Register, JBM-R-30 Fire Extinguisher Register, JBM-R-31 Working at Heights Equipment

Emergency equipment location is identified within the site emergency map (JBM-M-03).

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 74 Of 78

EMERGENCY RESPONSE PROCEDURE



Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 75 Of 78



35.4 General Emergency Response Chart

36 Appendix A – Company Index Register

The Company Index Register contains all Policy's, Forms, Registers, and Manual references to the company IMS system. The Index Register is an attachment to this manual.

❖ JBM-R-01 Company Index Register

37 Appendix B Company Waste Management Plan

Solid Wastes

- Solid wastes must be disposed of to a NT or Local Government approved waste facility.
- All solid waste should be recycled where possible.
- Refuse containers to be provided on site. A separate container will be provided for recyclable materials (E.G. scrap steel and aluminium cans).

Liquid Wastes

- Transfer drained oil, fuels and lubricants from machinery into clean containers with a lid that screws on tightly. Clearly label the container and keep in a secure on-site storage facility, preferably bunded.
- Take used oil to a used oil collection facility.

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 76 Of 78



Maintain accessible spill kits on site for hydrocarbons and relevant chemicals.

Hazardous Wastes

- Dangerous goods will be stored, handled, separated and signed as required by the Dangerous Goods Act AS1940.
- Hazardous goods and wastes will, where appropriate (E.G. outside locations) be stored in bunded areas away from watercourses.
- Spills of dangerous goods will be rendered harmless and collected for treatment and disposal at a designated site, including cleaning materials, absorbents and contaminated soils.
- Absorbent and containment material (E.G. absorbent matting) will be available where hazardous materials are used and stored and personnel trained in correct use.

Steel

- Steel unused, or waste is collected in our recycle bin located at the Company Head Office,
- An authorised company for recycling removes steel.

General Waste

 General Waste is collect in bins located at the Company Workshop – onsite locations bring back all rubbish to company workshop for disposal,

General Waste is collect by the Local Council on a regular basis for disposal

Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 77 Of 78



38 Appendix C Asbestos Register

Asbestos Register: Alcan Gove Residential Properties

House Style	Approx No: of Prop'ties	External Walls	Internal Walls	Ceilings	Soffit Linings	Bath Side Panels	Laundry Panels	Linen Press Panels	Guttering	Other	Comments
Cemac	40	AC	AC	AC	AC	AC	AC	AC	AC	VINYL TILES*	See Notes Below
Jennings	49	CC	CC	CC	CC	CC	CC	CC	CC	VINYL TILES*	See Notes Below
HJ	77	AC	AC	AC	AC	AC	AC	AC	AC	VINYL TILES*	See Notes Below
DJM	320	CON	PB	PB	AC	AC	AC	AC	AC	VINYL TILES*	See Notes Below
Nab19	19	MET	AC	MAS	AC	AC	AC	AC	AC	VINYL TILES*	See Notes Below
Alluiswiss	3	MET	AC	AC	AC	AC	AC	AC	AC		1000 0 1000 T. T. T. T. T.
Wallaby Beach	27	MET	AC	MET	AC	AC	MET	AC	N/A		
Flats	132	CON	CON/AC	CON/PB	AC	AC	CON	CON/TIM	AC	VINYL TILES*	AC present in passage ceiling
South		MET	PLY	PLY	N/A	AC	AC	AC	N/A		F passage coming

Note: Vinyl tiles "may" contain asbestos. Although many have been changed over time but "may" still be present in some of the above designs

LEGEND	
AC	Asbestos Cement Sheet
CC	Compressed Cement or Celulose Cement Sheet
CON	Concrete
PB	Plasterboard (Gyproc)
MET	Metal
PLY	Plywood
N/A	Not Applicable

DJM = A3, A4,B3, B4,E3,C3,C4 Inc all upgrades
HJ= K3 J3 J4
JENNINGS = JEN 3 JEN 4

NOTES:

- 1- Formal Testing has NOT been carried out in all properties therefore the above info is indicative only.
- 2- If in ANY doubt as to the likelihood of a material containing asbestos proceed on the basis that it does by taking all necessary precautions.
- 3- Some new floors may have been layed over existing tiles that may contain of asbestos. In all instances check prior to drilling or grinding vinyl floor surfaces.

Last Updated 28/07/2008

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Integrated Management System (IMS)		Uncontrolled When Printed	Issue Date: August 2020
JBM-M-01	Version 3.1		Page 78 Of 78