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1 PURPOSE

The purpose of this document is to define the process that MEGT uses for the identification, assessment, control and review of occupational health and safety hazards and their associated risks.

2 SCOPE

This policy and procedure sets out a risk management framework which outlines the foundations and organisational arrangements for designing, implementing, monitoring, reviewing and continually improving health and safety risk management strategies and operational processes throughout the organisation.

3 OBJECTIVES

The objectives of this document are to:

- Ensure that there is an organisational risk management process and plan in place that addresses the health and safety risks associated with the operations of MEGT.
- Ensure that management has implemented an effective framework to proactively manage any health and safety risks that MEGT may be exposed to in the course of its operation.
- Provide management and workers with information regarding the nature, possible impact and consequences of health and safety risks facing MEGT.
- Provide a framework for the regular review of organisational and operational health and safety risks.
- Provide guidance on the level and types of health and safety risks that are considered acceptable to the organisation.
- Establish an effective health and safety risk management system in accordance with AS/NZS ISO 31000:2009 *Risk management – Principles and guidelines*.

4 DEFINITIONS

4.1 Acceptable level of risk

This is the level of risk that all people involved in the risk assessment process consider to be acceptable for people conducting the process; and the level that a reasonable person would consider acceptable.

4.2 Consequence

The consequence is the outcome of the event.

4.3 Desirable control

A desirable control is a WHS control that should be implemented, but due to various circumstances, may not be implemented.

4.4 Hierarchy of control

The hierarchy of control ranks risk control measures in decreasing order of desirability and effectiveness. These are:

- *Elimination* – remove the hazard.
- *Substitution* – exchange the hazard for a lesser one.
- *Isolation* – separate people from the hazard.
- *Engineering controls* – use physical barriers to control the hazard.

- *Administrative controls* – provide information, training and procedures to ensure that people can manage the hazard appropriately.
- *Personal Protective Equipment (PPE)* – last layer of defence to stop people from being exposed to the hazard.

4.5 Implementable control

An implementable control is a WHS control that must be implemented. Unlike a mandatory control, the process can continue while the control is being implemented.

4.6 Likelihood

The likelihood is the chance of something happening. This can be assessed using the duration of the activity, the failure chance, and the number of workers conducting the activity.

4.7 Mandatory control

A mandatory control is a WHS control that must be in place and functioning before the process starts.

4.8 WHS risk management

WHS risk management is the process of hazard identification, risk assessment, and risk control with the aim of providing healthy and safe conditions for MEGT workers.

4.9 Organisation risk

The organisation risk is the WHS risk multiplied by the number of people exposed to that risk within the organisation.

4.10 Risk Assessment

A risk assessment is a documented process for determining the risk of a hazardous activity, process or item, and for determining controls to reduce the risk of the hazard.

4.11 Risk rating

A risk rating is the product of the likelihood and the consequences, and is a quantitative assessment of the risk associated with an activity. Please see the Risk Management Procedure for more details on the process of determining a risk rating.

4.12 Risk factors

Risk factors are circumstances, rather than hazards, that can increase the risk of a process above the norm.

4.13 WHS

Work Health and Safety (WHS); also referred to as Occupational Health and Safety (OHS). MEGT uses WHS to mean both OHS and WHS.

4.14 Worker

A collective term used to encompass all employees, visitors, contractors, sub-contractors, apprentices, trainees, volunteers and students - any person who interacts with the business or undertaking of MEGT. This term is legislative and was adopted by MEGT following the *Harmonised Model WHS Legislation*.

5 SPECIFIC RESPONSIBILITIES

5.1 Chief Executive Officer (CEO)

The CEO is responsible for the WHS Risk Management Framework and is accountable for the performance of this framework.

5.2 General Manager, People & Safety

The General Manager, People & Safety is responsible for:

- The implementation of the WHS Risk Management Policy & Framework.
- The provision of resources for the implementation of this Policy.
- The delivery of feedback to the Strategy and Risk Committee (Board).

5.3 National Health, Safety & Environment (HSE) Manager

The National HSE Manager is responsible for:

- Providing advice and training course content on WHS Risk Management.
- Coordinating the collection of the WHS Risk Register data.
- Producing a Risk Register for all MEGT activities.
- Producing a range of risk management tools to assist workers with the risk management process and provide information on hazard controls.
- Delivery of feedback to the Risk Management Committee and WHS Committee.

5.4 General Manager – People & Safety

The General Manager – People & Safety is responsible for:

- The implementation of the WHS Risk Management Framework.

5.5 Executive Management

Executive Management is responsible for:

- Ensuring that a risk based approach is adopted for the management of WHS activities.
- Identifying and developing a WHS Risk Register detailing the WHS risks associated with MEGT's operations and activities.
- Providing resources required to implement the WHS Risk Management Policy & Framework.
- Monitoring the implementation of the WHS Risk Management Policy & Framework.

5.6 Managers

Managers are responsible for:

- Ensuring stakeholders understand and follow the WHS Risk Management Policy & Framework.
- Attending training sessions organised in relation to the WHS Risk Management Policy & Framework.
- Implementing the WHS Risk Management Framework in the area under their control and for all activities they plan, organise or supervise in accordance with this framework.

5.7 Supervisors/Team Leaders

Supervisors/Team Leaders are responsible for:

- Controlling the WHS risks associated with the work or study they supervise using an agreed risk management process.
- Authorising risk assessments for those under their supervision.

- Ensuring that workers under their supervision have received appropriate training and have sufficient competence to undertake the tasks.
- Delegating (where appropriate) the supervision or training of a worker to a suitably qualified and/or experienced person as appropriate for the task.

5.8 Health and Safety Representatives (HSRs)

HSRs have the right to:

- Be consulted, so far as reasonably practicable, on risk assessment of new and existing processes that may affect the health and safety of workers.
- Review all risk assessments before sign off.
- Attend training sessions organised in relation to the WHS Risk Management Policy & Framework.
- Assist Managers and the National HSE Manager in implementing the WHS Risk Management Framework for the designated work group they represent.

5.9 National WHS Committee

The National WHS Committee is responsible for:

- Oversight of work health and safety risks identified by the Risk & Strategic Committee, Risk Management Committee and the WHS Consultative Groups.

5.10 MEGT workers who engage or manage contractors

MEGT workers who engage or manage contractors are responsible for:

- Ensuring that risk management is completed for each activity by the contractor and reviewed by relevant MEGT management before work commences.

6 GENERAL

This document establishes a framework in which MEGT can effectively identify, assess, evaluate, monitor and manage work health and safety risks in order to minimise any potentially detrimental impact on the ability of MEGT to undertake its operational and strategic functions in accordance with all legislative requirements.

MEGT will manage WHS risk by establishing and maintaining:

- A positive, risk averse culture.
- Relevant and suitable policies and procedures.
- An effective use of information technology.
- Identifying risk owners who have the accountability and responsibility to manage risk within the organisation.
- A proactive approach to ensure management and workers are aware of risks and consequences.

The responsibility for the operational implementation of the work health and safety risk management plan rests with the MEGT National WHS Committee. The National WHS Committee is responsible for implementing and maintaining robust internal risk management processes. It is expected that the National WHS Committee will stay alert to recognise all organisational work health and safety risks inherent within its area of monitoring and review.

6.1 Definition of Risk Management

Risk management is the term applied to a logical and systematic method of establishing a context, identifying, analysing, evaluating, treating, monitoring and communicating risks associated with any activity, function or

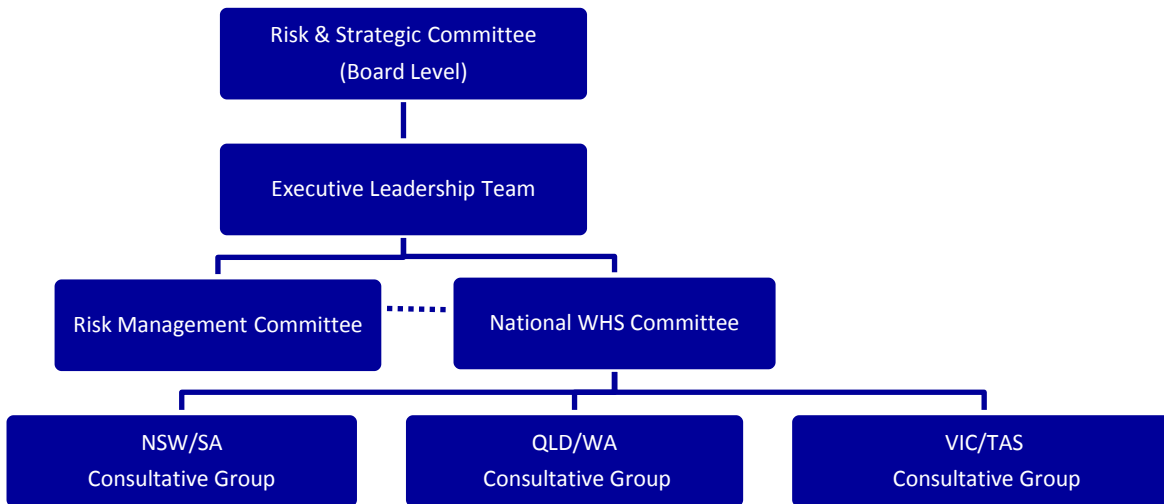
process (throughout MEGT) in a way that will enable MEGT to minimise losses and maximise opportunities. It is recognised as an integral part of good management practice and is an iterative process consisting of steps, which, when undertaken in sequence, enables continuous improvement through:

- Improvements in the quality of decision-making.
- Enabling effective execution of decisions.
- Ensuring that strategic decisions are informed and based on up-to-date information and sound judgment.
- Improving planning processes by enabling the key focus to remain on core activities and help ensure continuity of service delivery.
- Complying with relevant legal and regulatory requirements.
- Preparing for challenging events and improvement of overall organisational learning and resilience.
- Prioritising for budgeted resources.
- Improving financial reporting.
- Optimising performance through efficiencies in service delivery, major change and quality assurance initiatives.
- Contributing to the development of a positive organisational culture of improved governance, as well as helping establish clear purpose roles and accountabilities for all workers.
- Improving external stakeholder relationships and stakeholders’ confidence in the organisation through enhanced accountability and reporting processes.

Risk management can be applied at all levels of an organisation (strategic and operational) and to specific projects to assist with specific decisions or to manage specific recognised risk areas (*source: CPA Australia*).

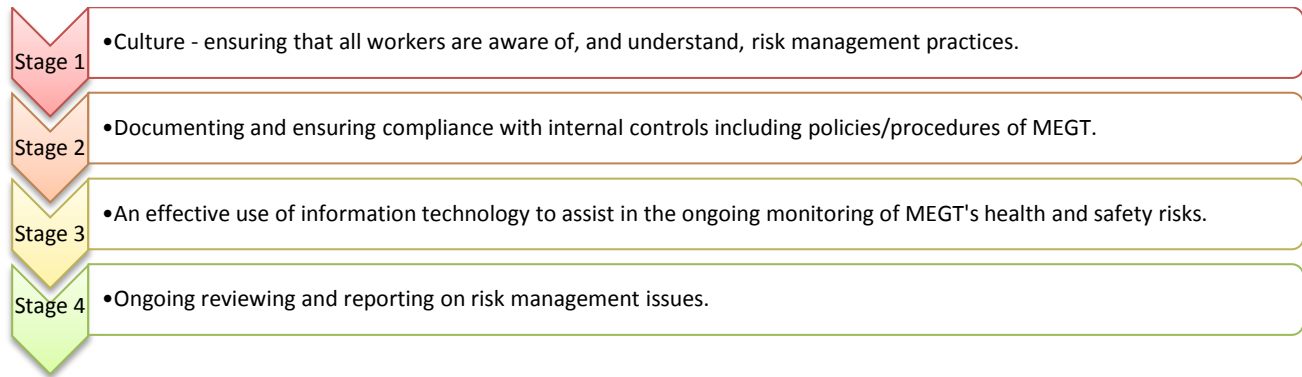
7 STRUCTURE OF MEGT RISK MANAGEMENT COMMITTEES

In simplified terms, the risk management structure of MEGT is as detailed below:



8 RISK MANAGEMENT FRAMEWORK

The framework below details the four main stages of risk management to be undertaken within MEGT:



8.1 Stage 1

In order to establish an appropriate risk management culture throughout the organisation, it is necessary that it be 'driven' from a 'top down' perspective. To this effect MEGT notes the support of the Board.

In addition, the CEO, Executive Management and key personnel have had input into establishing the WHS Risk Management Policy & Framework and are aware of the potential impacts of the various risks.

Through each of the aforementioned levels of control and management, it is expected that a culture of appropriate risk management will filter down to all workers and be established throughout MEGT.

8.2 Stage 2

The National Work Health & Safety Committee will manage and monitor progress towards compliance (and subsequent ongoing compliance) against risk management principles utilising the WHS Risk Management Policy & Framework. This framework assists in measuring MEGT's progress towards the management of risk based on the following key elements:

- People
- Strategy and Planning
- Leadership
- Financial Management
- Innovation, Quality and Improvement.

8.3 Stage 3

Information technology is an important part of the WHS management of MEGT - encompassing all aspects of its work and risk management practices.

MEGT is committed to the continued use of information technology to assist in the ongoing monitoring and control of risk management and, in the event of a catastrophic information technology collapse, detailed IT disaster and business continuity plans have been established.

8.4 Stage 4

The following ongoing reviews and reporting on WHS risks will occur through:

- Regular reporting to MEGT's Risk & Strategic Committee (Board) on risk management issues.
- Regular reporting on risk issues at meetings of the National Work Health & Safety Committee and Risk Management Committee where issues can be discussed and documented via meeting minutes.

9 RISK MANAGEMENT PROCEDURES

The following risk management procedures are to be implemented and/or performed:

- Robust internal controls and written policies/procedures supported by an ongoing audit process. (Such audit process to be via quality audits, an internal audit function or a combination of both.)
- An annual review of the organisation's operations to assess WHS risk management detailing any perceived areas of weakness together with suggestions for improvements to procedures and controls.
- An annual external audit that includes a focus on WHS management risk, its management and reporting processes.
- Align the organisation's culture with risk management techniques.
- Training of management and workers in the identification, assessment, monitoring and management of risk.
- Regular reporting on risk issues at meetings of the National Work Health & Safety Committee and Risk Management Committee.
- Include risk management activities in job descriptions.

10 WHS RISK MANAGEMENT PROCESS

10.1 When to do an assessment

WHS risk management must be undertaken when there is a reasonable WHS risk associated with:

- The introduction of new equipment, procedures or processes.
- The modification of equipment, procedures or processes.
- Specific circumstances change that increases the risk (e.g. pregnancy).
- WHS risk management must be undertaken prior to the commencement of activities.
- WHS risk management must be undertaken when an injury or near miss occurs that reveals a previously unidentified hazard.

10.2 Who must be involved

Risk assessments must be completed by the person who will be:

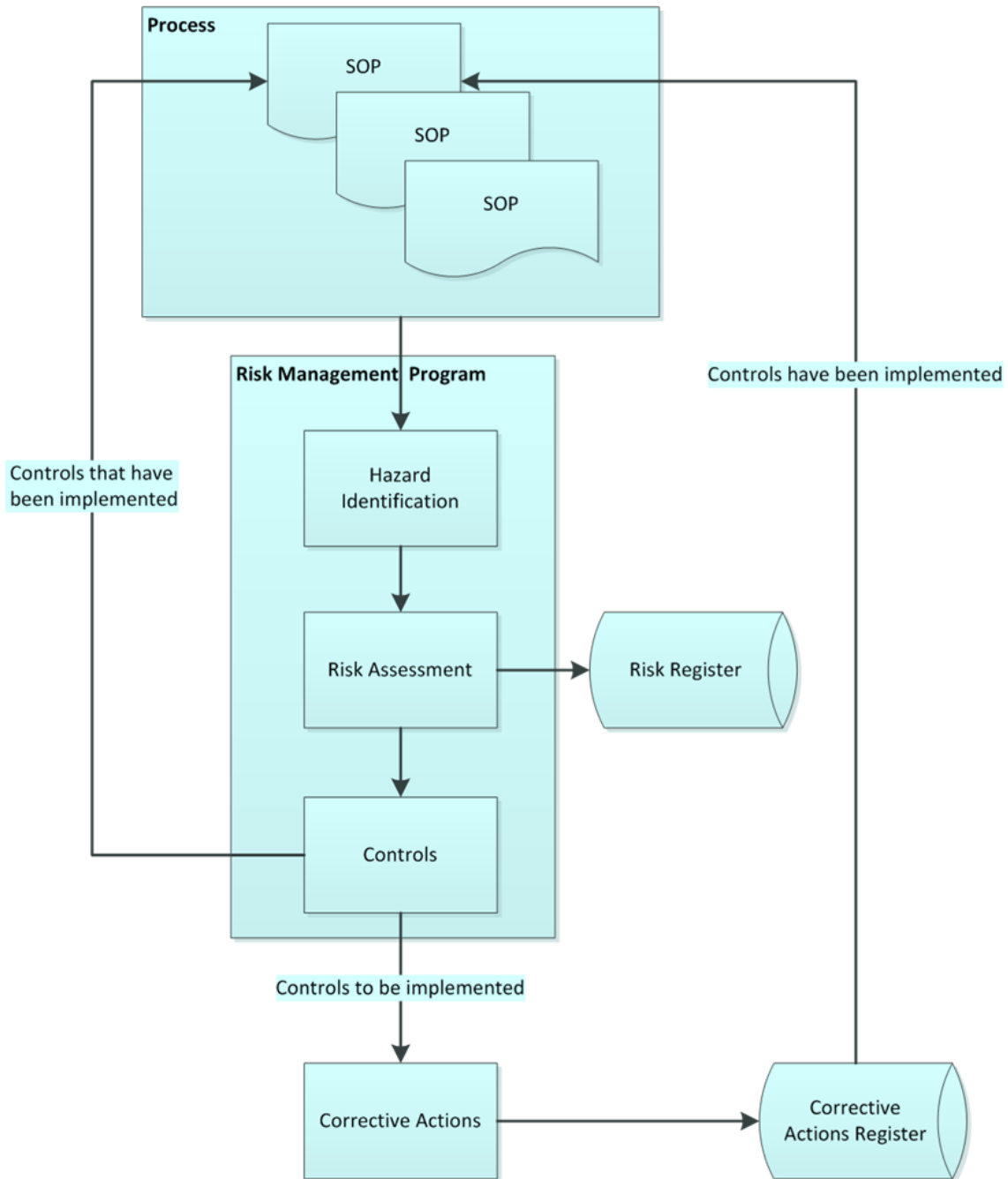
- Undertaking the process; or
- Supervising the process.

10.3 Consultation

There must be consultation with the:

- Supervisor of the area.
- Worker undertaking the task.
- HSR of the area.
- MEGT subject matter expert (when appropriate).

10.4 WHS Risk Management Flowchart



10.5 Process

In order to conduct risk management, there must be an established process that is being assessed. Risk cannot be assessed in isolation from the process.

10.6 Hazard Identification

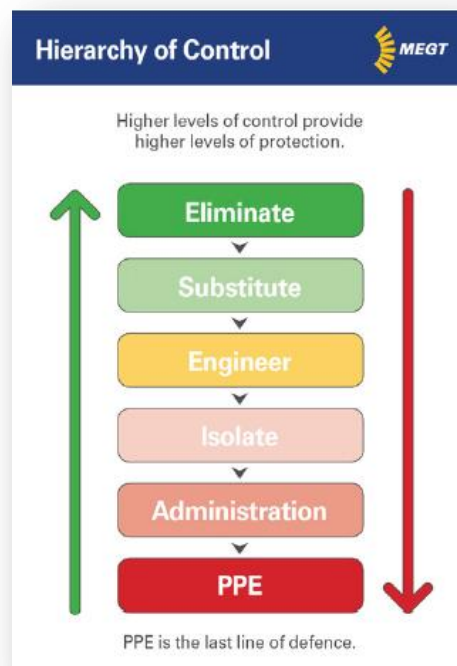
- Starting with the established process, identify all hazards present that could reasonably lead to injury or illness.
- Hazards must be identified in consultation with people mentioned in Section 5 of this document.
- Hazards that are identified must be documented on the WHS Risk Register.
- Hazards that are identified must be assessed using the relevant Risk Assessment tool.
- When identifying hazards these energy sources must be considered:
- Biomechanical (ergonomics and manual handling);
- Mechanical (plant and equipment);
- Microbiological (germs and sharps);
- Electrical;
- Gravity (slips, trips and falls);
- Noise and Vibration;
- Chemical;
- Thermal (extreme heat and extreme cold);
- Radiation (sun, x-rays, microwave;)
- Psychosocial (stress, bullying, harassment).

10.7 Assessing the Risk

- Assessment of risks associated with hazards must be done using a relevant Risk Assessment Tool.
- WHS risks must be assessed using the risk score method as defined in the Risk Management Matrix.

10.8 Risk Control

Risk control measures must be selected based on the hierarchy of control. The hierarchy of control ranks risk control measures in decreasing order of desirability and effectiveness and includes:



Elimination	Regulations that support the WHS Legislation require the elimination of risks as the first step in risk control.
Substitution	Substitution of a less hazardous alternative.
Isolation	Enclosing or isolating the hazard.
Engineering Controls	Changing processes, equipment or tools e.g. <ul style="list-style-type: none"> • Machinery guards • Ventilation • Mechanical Aids.

If a risk to workplace health and safety remains after the above methods have been used, administrative controls should be applied or, if these are still not adequate, personal protective clothing and equipment worn.

Note: These methods of risk control should be used in conjunction with other controls and are not preferred in isolation as the potential of the risk is not eliminated or reduced.

Administrative Controls	Information, training and procedures, for example: <ul style="list-style-type: none"> • Job rotation / Training • Limiting access • Permit to work systems • Safe operating procedures (SOP) • Signage.
Personal Protective Equipment	Overalls, safety glasses, closed shoes/boots, hearing protection.

10.9 Documenting Controls

Identify and note which proposed controls are mandatory, which are implementable and which are desirable on the Risk Assessment Worksheet or tool. (Refer Section 4 for definitions):

- Mandatory controls must be in place before the processes are undertaken.
- Implementable controls can be implemented while the processes continue, but must be implemented within a reasonable timeframe.
- Desirable controls should be put in place within a reasonable timeframe.

11 REVIEW OF RISK ASSESSMENT

A documented process (using available tools) shall be established to evaluate the effectiveness of the controls in achieving an acceptable level of risk. The area conducting the process can determine this process:

- The process should be reviewed regularly until the acceptable level of risk is achieved.

Once the acceptable level of risk is achieved, the risk assessment should only be reviewed when:

- There is a significant change;
- A Hazard and Incident Report is generated; or



- At least every three years.

12 RISK REGISTER

Completed risk assessments should be filed as follows:

- The risk assessment must be placed on the Divisional Risk Register (Elumina Database).

13 PREVENTATIVE AND CORRECTIVE ACTIONS REGISTER

The WHS controls to be implemented must be tracked using the Elumina database.

14 PROCESS

The documentation associated with the established process that has been assessed must be updated to include:

- The controls identified; and
- A method for maintaining controls.

15 START SAFE – JOB SAFETY ASSESSMENT (JSA)

The START Safe – Job Safety Assessment (JSA) booklet has been developed to assist apprentices and trainees assess hazards prior to any work beginning.

The booklet has been designed to allow workers performing activities to review their exposure to common hazards associated with work tasks (via the Prompt Cards), and where a hazard has been identified work out ways to eliminate or control the hazards.

Workers can share the JSA checklist and identified controls with their Host Employer or Field Officer. Once the JSA Booklet has been completed a new one can be requested from their Field Officer.

Note: Advise that they can use booklet from host employer if authorised by MEGT Health and Safety Team.

16 SAFE OPERATING PROCEDURE

The requirement for a Safe Operating Procedure (SOP) will be defined by the divisional risk register. The SOP should provide workers with direction on how they can complete the work task safely.

The Divisional General Manager is responsible for ensuring that SOP's are developed for the identified tasks and/or equipment within their division. SOP are to be created by workers with knowledge and competency in completing the work. It is the responsibility of the division to ensure that SOP training has been provided to workers, and that this training is recorded.

Note: If you require support and/or assistance in developing a SOP, contact the MEGT Health and Safety Team.

17 SAFE WORK METHOD STATEMENT (SWMS)

Where MEGT has appointed a contractor to perform high risk work at a workplace controlled by MEGT a Safe Work Method Statement is required. The Safe Work Method Statement (SWMS) tool has been developed to assist management, workers and contractors to assess and control the risks of their activities that may impact

the health and safety of workers.

The SWMS has been designed to allow workers performing medium and high-risk activities to critically examine work task to identify the hazards of the job and to work out ways to eliminate or control the hazards.

Following completion, the SWMS must be reviewed by a manager/supervisor/HSR/WHS Team prior to commencing the process.

18 TRAINING

Training in risk management at MEGT may be formal or informal:

- Training in risk management is provided by the WHS Team including the use of the risk management tools.
- Training in the use of the START Safe – Job Safety Assessment is provided by the relevant Manager or their delegate.
- Training in the use of Safe Work Method Statements (SWMS) and/or Safe Operating Procedures is to be provided by the relevant Manager or their delegate.
- Training in the development of a Safe Operating Procedure is to be provided by the relevant Manager or their delegate.

19 RECORDS

- Risk assessments and SWMS (as required) must be documented and kept with the associated process documentation (Elumina).
- Risk assessments and SWMS must be accessible to workers that are affected by the process. This can be done by contacting their Manager or the WHS Team).
- Task risk Assessments must be kept for five (5) years or until reviewed. (Elumina)
- Equipment Risk Assessments are must be maintained current for the lifecycle of the equipment and retained for three (3) years post-project.
- SWMS must be maintained current for the lifecycle of the job, and retained for three (3) years post-project.
- START Safe – Job Safety Assessment are to be kept whilst the work is being completed. There is no requirement to complete the START Safe – Job Safety Assessment following the work being completed.

20 TOOLS

Tools associated with this procedure:

- Risk Management Matrix.
- Risk Assessment Template – Hazardous Manual Handling.
- Risk Assessment Template – Plant and Equipment.
- Risk Assessment Template – Chemical Management.
- START Safe – Job Safety Assessment.
- Safe Work Method Statement – Template
- Standard Operating Procedure – Template
- WHS Risk Register.
- WHS Corrective Actions Register.
- Incident Management and Reporting Procedure.
- Guidelines - How to develop a Safe Work Procedure

- Guideline – How to develop a Safe Work Method Statement
- WHS Purchasing Guidelines.
- Workplace Safety Inspection Checklist.

21 REFERENCE MATERIALS AND RELATED DOCUMENTS

Legislation, Australian Standards and Codes of Practice

- WHS Act 2011 and Regulations 2011(NSW, QLD, SA, TAS, ACT, NT, CWTH).
- OHS Act 2004 and Regulations 2007 (VIC).
- OSH Act 1984 and Reguations 1996 (WA).
- Occupational Health and Safety Management Systems, AS/NZS 4804:2001 & AS/NZS 4801:2001.
- Risk Management – Principles and Guidelines, AS/NZS ISO 31000:2009.
- WHS Risk Management Handbook, Australian Standard HB205 – 2004.
- Code of Practice - How to manage work health and safety risks.

MEGT Documents

- 11-PP-001 – WHS Risk Management Policy & Procedure
- 11-FM-001.001 – Risk Assessment Checklist – General
- 11-FM-001.002 – Risk Assessment Checklist – Hazardous Manual Handling
- 11-FM-001.003 – Risk Assessment Checklist – Chemical
- 11-FM-001.004 – Risk Assessment Checklist – Plant & Equipment
- 11-INS-001.001 – How to use the Risk Matrix Instructions
- 11-TMP-001.001 – SOP Template

22 BREACHES OF THIS DOCUMENT

Any breach of the WHS Risk Management Policy and Procedure may have unintended and harmful consequences. Breaches of this policy may lead to disciplinary action being taken, including dismissal in serious cases.

23 DOCUMENT REVIEW AND AUTHORISATION DETAILS

This policy and procedure will be reviewed at least every 2 years or as required by legislative change, corrective /preventative actions following an incident or as directed by MEGT Board or Executive team.

Page#	Version #	Date	Amendment Details
All			Update to framework and processes to reflect AS4801 requirements

END OF DOCUMENT