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HSE MANAGEMENT PLAN
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1. INTRODUCTION

An integral component of Southern’s Water Technology mission to provide excellent services to its customers is the commitment to providing a safe and healthy work environment for employees, contractors, visitors and customers.

Health, Safety and Environment is recognised by the Company as a manageable problem and appropriate management systems have been and will continue to be, developed to reduce the incidence of work related injury and ill health to the lowest possible levels.

While being a manageable problem, the minimisation of work related injuries and other losses is not seen as an easy task, and is seen as one where only a systematic approach will achieve continuous improvement of the Program.

The Company believes that the management accountability structure, training regimes, clear goals and meaningful performance measurement form the basic ingredients for the Program to succeed.

The Company also recognises its obligations under the Occupational Safety and Health Act 1984 (WA) and as such calls upon Management to ensure that a strong consultation process is in place to encourage all employees to take an active role in identifying, evaluating and controlling workplace hazards.

To achieve this end, Southern’s Water Technology will continue to develop a Safety Management Plan that provides for various measures to be taken including:

- Clear management accountability structure;
- Hazard control strategies;
- Training, induction and education;
- Effective communication processes;
- Effective accident/incident reporting and investigation;
- Effective emergency response planning; and
- Program auditing and monitoring.
- Regular contact with Worksafe, the Mines department or outside HSE providers for updates on Legal Obligations, regulations or codes or practice.

(Signed) Managing Director 1/3/2019
2. HEALTH, SAFETY AND ENVIRONMENT POLICY

Health, Safety and Environment Policy

It is the policy of Southern’s Water Technology to provide all employees with workplace conditions and job procedures, which seek to minimise the risk of injury and illness to people and damage to property.

The Managing Director is ultimately responsible for the successful administration of the safety program, which is driven essentially by the Safety Management Plan, and has the responsibility of co-ordinating the efforts related to the minimisation of risk and accidents in the workplace. Each management and staff member has the direct daily responsibility to ensure that they and their colleagues are not exposed to hazards while at work.

This policy will be pursued and achieved by:

• Ensuring the co-operative participation of management and the general workforce in safety related activities. Progressing the program via consultative processes with all staff and the involvement of HSE Representatives is seen as fundamentally necessary.

• Ensuring that new and transferred employees are fully prepared for the risks they may encounter in their work.

• The ongoing recognition and control of physical and procedural hazards.

• Conducting formal and informal training to improve the safety related knowledge and skills of employees. This includes induction training and the training in safe work procedures.

• Ensuring plant and equipment is safe and suitable for the job, via effective purchasing and maintenance systems.

• Providing an effective system of accident/incident investigation and reporting.

• Providing employees with the most appropriate type of personal protective equipment as required by any company activity.

A safe and healthy work environment requires the involvement and commitment of all staff. Only this combined effort will produce a permanent reduction in human suffering and other losses.

Tim Sevenson
Managing Director

Employee Representative

3. SAFETY RELATED RESPONSIBILITIES

3.1. Managing Director (Responsible Officer)

3.1.1. Ultimately responsible for ensuring the ongoing availability to all employees, contractors and implementation of the Company’s Safety Management Plan.


3.1.3. Promote and support Health, Safety and Environment as a critical and integral component of all Council operations.

3.1.4. Providing leadership and support, via personal involvement in key aspects of the program.

3.1.5. Co-ordinate the implementation of key elements of the safety/risk management strategies.

3.1.6. Monitor the implementation of key elements of the Program and help to ensure that these are installed within the time frames defined by the Company Directors or the Safety Advisory Committee. Act as an advocate throughout the organization to promote the need for systematic approaches to injury reduction.

3.1.7. Promote consultation processes.

3.1.8. Ensure that the Company Directors are aware of major safety issues and of the progress of the Program.

3.1.9. Identify and promote the need for “top-up” senior management training as and when required.

3.2. Supervisor/ Operations Coordinator (Program Coordinator)

3.2.1. Responsible for the implementation of policies and procedures related to safety and health in their Department(s).

3.2.2. Maintain awareness of the success of implementation of the programme.

3.2.3. Ensure that there is a strong consultation process with general members of the staff regarding safety matters that are relevant to them.

3.2.4. Ensure that adequate resources and allocated for safety related training and other relevant aspects of the program.

3.2.5. Ensure Area Supervisors discharge their responsibilities as outlined.
3.2.6. Ensure that as far as practicable, staff will not be exposed to hazards and that they are informed about their rights and responsibilities regarding safety and health at work.

3.2.7. Ensure that all staff, including part-time, casual, temporary or from a hire labour agency receive a thorough (safety) induction prior to commencement of work.

3.2.8. Ensure all employees are fully trained in Emergency Procedures.

3.2.9. Ensure that planned hazard inspections are undertaken in accordance with established inspection program requirements.

3.2.10. Ensure that health and safety standards are considered in the purchase of plant and equipment.

3.2.11. Ensure that staff report all work related accidents and incidents and ensure that these events are thoroughly investigated using the Company’s accident/ incident reporting proforma.

3.2.12. Ensure that elected Safety and Health Representatives, if any, and other employees are consulted regarding pending changes to premises, plant, systems of work and equipment which may/ will impact on their safety and health.

3.2.13. Ensure that the workforce is addressed on health and safety related matters at least twice yearly.

3.2.14. Ensure that any Contractors engaged are subjected to Company’s pre-qualification standards and information exchange processes prior to engagement.

3.2.15. Ensure that there is competent and sufficient Supervision of employees.

3.2.16. Ensure that the progress or success of safety initiatives is formally reviewed twice yearly.

3.2.17. Ensure statutory compliance where relevant.

3.3. Area Supervisors

3.3.1. Ensure statutory compliance where relevant.

3.3.2. Ensure that new employees receive a thorough induction prior to commencement of work. This includes casual, part-time and contract labour.

3.3.3. Ensure that no employee commences a new-activity without appropriate pre-job instruction.

3.3.4. Undertake planned and documented inspections of the workplace in accordance with Company’s Hazard Inspection guidelines.

3.3.5. Report and investigate all near-miss incidents or, actual injury or damage causing events, using Company’s accident and incident reporting proforma. This proforma is to be processed within 24
3.3.6. Ensure that all employees are fully trained in Emergency Procedures relevant to their work area.

3.3.7. Conduct safety related meetings at a frequency agreed with the Operations Manager.

3.3.8. Ensure manual handling related activities that have potential to cause harm or injury are evaluated and controlled in accordance with Worksafe Manual Handling Code of Practice.

3.3.9. Ensure that all employees are provided with instruction in the proper selection, use and maintenance of Personal Protective Equipment.

3.3.10. Consult and co-operate with elected Safety and Health Representatives or other employees on matters of safety and health.

3.3.11. Participate in and ensure safety and health training of employees is in line with Company requirements.

3.4. Health, Safety and Environment Representatives

While this section is primarily concerned with responsibilities, it is also very important that all staff be aware of the functions of the HSE Representatives. While these matters do not constitute responsibilities, they are legal rights that the Representatives have to participate in the workings of the safety program.

Thus the roles and functions of an HSE Representative are:

3.4.1. Inspect the relevant workplace, with a view to identifying hazards.

3.4.2. Investigate accidents/ incidents.

3.4.3. Attend the Safety Advisory Committee.

3.4.4. Act as a focus of communication for the workforce, where particular matters have not or could not be satisfactorily dealt with by Supervisors and to refer these matters to the Safety Advisory Committee.

3.4.5. Generally consult and cooperate with Management to ensure that the activities within the Safety Management Plan get properly implemented.

3.4.6. Immediately report to their Supervisor (or other Management representative, if their Supervisor is not available) any accident or situation where injury to a staff Member or a member of the Public appears imminent.

3.5. All Employees
3.5.1. Work in a manner that does not expose himself or herself or any other person to the risk of injury or harm to health.

3.5.2. Report all work related injuries or illness.

3.5.3. Report forthwith, any hazard that they themselves cannot rectify.

3.5.4. Wear, use and maintain personal protective equipment as issued and instructed.

3.5.5. Follow all instructions given related to safe working practices.

3.5.6. Consult and co-operate with management on matters of safety and health.

3.5.7. Attend all toolbox meetings.

4. CRITICAL PROCESSES

4.1. Training/ Induction

The Company requires that all employees attend ongoing training generally as provided for in the annual Training Management Plan. Some of the training nominated in this Plan, will be safety related and will help ensure that staff understands the Company safety requirements and their responsibilities and will promote working in a manner which will reduce the risk of harm to themselves and others. Should the work environment become of an unacceptable risk, all workers are empowered to STOP the work.

Training options will cover such things as:

- Relevant legislation;
- Hazard identification and control;
- Supervisory skills;
- Accident investigation and reporting;
- Plant and equipment usage skills eg diggers etc;
- Manual handling risk control;
- Initial and refresher training for HSE Representatives;
- Emergency procedures/ fire suppression : hand held extinguishers;
- Supervisor skills; and
- Risk management and Change Management principles.

It is Company Policy that any new Company employee, whether full time, part time or contracted labour, is exposed to a formal induction process which includes and promotes OH & S prior to commencement with Company.

It will be the responsibility of Company Management to ensure that this occurs. All inductions will be documented, and where appropriate, new staff will be assessed to confirm that certain key information has been learnt. Company’s
Safety Handbook serves as a key element in the induction programme and is seen as an on-going resource for staff.

Training plans and programmes will be developed to ensure that Managers/Supervisors have adequate working knowledge of:

- hazard evaluation techniques; and
- accident/incident reporting and investigation.

All newly elected Safety and Health Representatives are requested to attend the prescribed training course.

Company Management will all be required to attend training in relevant aspects of Safety/Risk Management processes, to ensure that Managers stay abreast with current industry and legislative standards.

Ongoing general awareness training will be provided for all staff in areas that are relevant to them. This training will cover such topics as:

- Fire safety/extinguisher usage;
- UV skin cancer;
- Manual handling/back care/ergonomics;
- First aid;
- Plant inspections; and
- Plant operating skills, including refresher courses.

The Program Coordinator, in conjunction with the relevant staff, will develop specific plans and programmes to facilitate the coordination and timely completion of required safety training. These plans will also highlight where specific retraining is necessary.

4.2. Hazard Identification, Evaluation and Control

4.2.1. Identification of Hazards

Company Management recognises that the identification, evaluation and control of hazards is a cornerstone of a successful (proactive) Program. Specific initiatives will be installed to continually identify, evaluate and control hazards.

Important initiatives in this area will include:

- Development, implementation and ongoing improvement of formal hazard inspection processes (see inspection checklists).
- Ongoing training for all staff in hazard identification and evaluation processes.
- Communication with Associates, Local Governments, Industries and State/Federal agencies.
• The thorough examination of all accident/ incidents to determine trends and possible uncontrolled hazards.
• Use of the Company’s specific hazard reporting pro-forma.
• Consulting with external safety professionals.
• Referencing Acts, Regulations, Codes of Practice, Guidance Notes and Standards.
• Development of Risk Registers.

4.2.2. Risk Evaluation/ Analysis

Company Management recognises that there are numerous hazards presented as a consequence of the tools and machinery present and the nature of activities. Thus, to prioritise or “rank” risks in a manner such that they can be treated efficiently will require a standardised risk ranking/ evaluation tool and the development of Risk Registers. These registers will facilitate better planning and resourcing and will provide a record of what has been properly addressed.

The risk ranking or evaluation matrix will underpin the evaluation process and key employees will be trained in the proper use of this risk-ranking tool. The ongoing responsibility for the enhancement of the risk evaluation and analysis will ultimately lie with Managing Director and will be supported by the Safety Advisory Committee.

Change Management must be deployed once any changes on the job are recognised. A re-assessment process must be initiated by the workforce in the form of a JHA as evidence. All documentation will be returned to the office and completed JHA’s or SWI forms will be retained in records with job documentation according to current WHS regulations, generally 1 year for high risk work.

A copy of the HSE risk register and evaluation matrix tool is available in the company extranet in the Safety and Training section.

4.2.3. Risk Control Strategies

Company Management will, where practicable, undertake to control hazards utilising the established hazard control hierarchical model which is as follows:

i) Elimination, of a hazard.
ii) Substitution, replacing a hazard with a less dangerous option.
iii) Engineering methods, e.g. guarding, installing hand rails.
iv) Administrative controls, ensuring adequate training regimes/systems of work.
v) Personal protective equipment.

That is to say, the elimination of the hazard will be the preferred option where this is technically and economically feasible.
4.2.4. Personal Protective Equipment

Within the activities of the Company, there are many instances where it is not possible to eliminate all of the associated hazards eg. Pressurised lines and electrical equipment, and hence shielding the human body from the hazard, becomes the last remaining strategy.

For this reason, the appropriate use of personal protective equipment (PPE) becomes a key element of the injury prevention program.

Thus the Company will provide, at no cost to the employees, appropriate PPE as required by, Safety Data Sheets, Codes of Practice, Australian Standards, Company safety rules or policies and safe work procedures.

Controls regarding PPE, will be applied to ensure:

- The right equipment is purchased; in line with relevant Australian Standards;
- Its issue includes instruction on the proper use i.e. how to wear;
- Worn andunserviceable equipment gets replaced;
- Equipment is maintained as per the manufacturer’s recommendation; and
- Equipment is worn when it should be. (This may require the nomination of workplaces, as opposed to specific tasks which require mandatory use of certain equipment: Refer Task JSA)
- PPE register will be maintained.

It will be the responsibility of line management (mainly area Supervisors) to ensure that these six requirements are carried out.

4.3. Accident/Incident Reporting and Investigation

Company Management, recognises that the proper investigation of all accidents/incidents is vital to success in preventing accidents. Thus, it is expected that any incident that has the potential to cause harm, injury or asset/property damage and any accident that results in injury or harm, asset/property damage be documented on the accident/incident report proforma and is investigated by the Supervisor in charge.

Company Management recognises its statutory obligations with regard to reporting notifiable injuries to the Commissioner for WorkSafe and this will be undertaken.

Company Management will ensure that appropriate resources are available for staff to undertake proper investigations and will provide the necessary training.

4.4. Communication/Committee Structures

Company Management acknowledges that a vital link in the success of its accident prevention initiatives is to have open and effective communication channels within the organization to ensure that the needs of the workforce
reach Senior Management and conversely, that the expectations of Senior Management are clearly articulated to the workforce.

Formalising these communication processes by way of dedicated meetings will compliment existing informal Supervisor - employee contacts and will facilitate the prompt resolution of any safety and health issues within the organization.

Formal safety related meetings and forums within the Company include:

**4.4.1. Safety Advisory Committee**

This forum will meet at least every three (3) months and the Managing Director and the Program Coordinator are to attend. The structure and membership of the committee will meet the requirements of the OS & H Act and may discuss matters regarding policies, procedures and planning, as well as contribute to solving operational (safety) issues.

The committee will determine it's own process.

Minutes of the meeting will be distributed to all Committee Members, Managers and posted upon notice boards at all Company locations.

Minutes of each meeting will include details about who is to do what and by when (i.e. responsibility and deadlines).

The Managing Director will ensure that a (representative) Director attends all meetings.

The Committee will be supported by the presence of a dedicated minute clerk and a structured agenda will be available and sent out at least seven (7) working days prior to each meeting, if possible.

Company Management will enhance the Committee profile and provide the necessary training for Committee Members on proper meeting rules, etiquette and processes.

**4.4.2. Workplace Toolbox Meetings**

Company Management will encourage and ensure that all employees have the opportunity to attend workplace based informal sessions to ensure there is on-going health and safety related training on relevant issues. These forums will also provide another opportunity for staff to raise safety matters about which they are concerned.

Indoors operations will be required to schedule and provide for planned safety related briefing or training for all staff. This will be achieved by ensuring that health and safety is listed as a permanent agenda item for all operational Management meetings.

If deemed required by the safety committee, the Company Management will engage external professionals to support these initiatives.
The staff noticeboard in the company lunch room, which is accessible to all employees, is utilised to distribute HSE information as required. All staff also have work email addresses which they can easily access for distribution of information.

4.4.3. Executive Management Meetings

Safety/ Risk Management will be listed as an agenda item for all Company Management meetings that will include attendance by, and a progress report from, the Program Coordinator.

4.5. Emergency Response Planning

Company Management has developed and implemented formal/structured emergency response plans capable of ensuring that all persons are safely removed from danger and that potential damage to Company assets is minimised.

All staff will comply with this plan.

4.6. Contractor Management

Company Management recognises that the Company has specific general duty of care type obligations to Contractors, where it is deemed that the Company has reasonable control over what the Contractor in doing. (Refer to Section 19(4) Duties of Employers - OS & H Act 1984).

Thus Company Management will develop and implement Contractor control processes, which may include, but is not limited to:

i) Development of safety related pre qualification criteria for contractors.
ii) Developing the philosophy that contractors will not be selected on price alone.
iii) The provision of safety related training for contractors where necessary (as a condition of contract).
iv) The development and implementation of specific safety related documented information exchange processes.
v) The expectation that the Company requires contractors to work to the same (safety) standards as Company employees.

4.7. Injury Management/ Rehabilitation

4.7.1. Rehabilitation

Company Management is committed to the development and implementation of initiatives designed to effectively intervene and manage the return to work process for any Company employee who sustains a work related injury or illness.

Company Management will also encourage the development of rehabilitation processes for non-work related injuries or illness.
These strategies will be enhanced via Company’s Rehabilitation Policy

4.7.2. First Aid

Company Management will ensure that where possible, prompt and proper First Aid is available for any employee that may require it.

The provision of properly trained First Aiders in the workplace, the provision of, and ongoing maintenance of, adequate First Aid kits in readily accessible locations and the First Aid recording process will compliment this strategy.

The ongoing development of Company’s First Aid policy will reference WorkSafe WA Code of Practice on First Aid and as a function of this, all First Aid qualified staff will have their names distributed to all staff and posted on all notice boards for ready reference.

Where practicable, there should be a First Aid qualified officer readily available at all Company workplaces whenever there is staff present.

In all cases, Management will make available details about where and how to access proper medical treatment as required.

4.8. Purchasing/ Procurement Requirement

4.8.1. Purchasing and Design

Management, when specifying or purchasing plant and equipment will ensure that, (so far as is practicable), no new plant or equipment is used unless it fully complies with the specifications and that those specifications will ensure that no new hazards are bought into the workplace. (Note: if an essential piece of equipment must be purchased and it does involve a hazard i.e. noise, then this hazard will be properly addressed).

Appropriately qualified personnel will monitor and maintain the plant/equipment to ensure that it does not have (safety) defects and that it continues to function properly.

Plant or equipment that is purchased should, where applicable, be verified as being satisfactory via the application of Checklists or monitoring (i.e. for noise).

As a minimum requirement, plant and equipment shall comply with all statutory requirements such as for Fall Protection, Roll Over Protection,
emergency stopping and fire protection.

Manufacturers and supplier’s handling, storage and packing recommendations, will be recorded and observed.

**4.8.2. Purchasing of Hazardous Substances**

Purchasing of hazardous substances and chemicals that are specified in WorkSafe Australia schedules and the Occupational Safety and Health Act and OS&H Regulations 1988 shall be accompanied by a Safety Data Sheet (SDS), which is to be supplied by the product supplier.

**4.8.3. Maintenance, Inspection and Testing**

Company Management shall ensure that procedures are in place for the maintenance, inspection and testing of plant as per the relevant HSE Regulations. Typically these procedures would apply to:

- Mobile plant and equipment; and
- Portable electrical equipment.

A location record for all relevant items of plant and equipment shall be developed and, where appropriate, portable equipment should be marked, stamped or tagged to inform operators of its serviceability status.

Plant or equipment under maintenance shall be isolated and identified by way of Danger or Out of Service Tags. A copy of the tagging procedure is available in the Procedure manual.

**4.9. Manual Handling**

While this section is essentially about hazard identification and control, because of the significance of Manual Handling as an issue for Company operations, it has been treated separately.

Manual Handling is any activity requiring the use of force exerted by a person to lift, lower, push, pull, carry or otherwise restrain a person, animal or thing. (Ref: WA Manual Handling Code of Practice).

Given this definition, Company employees may undertake a significant amount of manual handling as a part of normal daily activities. Manual handling accounts for a large percentage of all industry related injuries and thus requires special attention.

All employees will comply with the induction training in relation to manual handling.
4.10. Performance Evaluation

Company Management realises that it is difficult to manage that which is not measured, thus the Company Management will undertake:

4.10.1. Systems Audits

Every year the Company will formally engage an external consultant undertake a Risk Control Systems Audit.

The subsequent recommendations of the Audit will be thoroughly examined by the Company Management, and action plans developed to support ongoing improvement by the Programme Co-ordinator in conjunction with the Company Management.

4.10.2. Programme Audits

All significant program elements will be subject to an “application” audit, at least twice yearly. This process will verify the actual application of the policy/procedure in the workplace. For example, the Company’s hazard inspection processes, accident/incident reporting and investigation processes, emergency response plans, manual handling activities, etc, will be subjected to ongoing audit/improvement processes as a function of the Company’s commitment to continual improvement.

4.10.3. Statistical Evaluation

The Safety/Risk Management programme will be regularly evaluated against the industry standard statistical targets, with calculations and criteria generally based upon Australian Standard AS 1885.1 - 1990 Workplace Injury and Disease Recording Standard.

Company Management recognises the value of comparison schemes where lost time injury frequency rates, workers compensation frequency rates, hours lost rates, fleet loss rates are assessed and accepts these as a good indicator of the Company’s performance. Thus, Company Management will strive to produce reductions.

4.11. Drugs and Alcohol Policy

Southern’s Water Technology recognises that alcohol or drug misuse will impair an individual’s ability to perform work safely. It is the policy of this company to protect its employees, assets, the community and the environment in which it operates, from hazards arising from alcohol or drug misuse in the workplace.

Consequently, Southern’s Water Technology requires the performance of its employees, contractors and others to be unimpaired by drug or alcohol misuse whilst on any work site or when performing any work while representing the company.

The illegal or unauthorised possession, consumption, sale or being under
the influence or alcohol or illicit drugs whilst performing work for Southern’s Water Technology is prohibited and is a breach of an individual’s duty of care under section 20 of the Act.

After investigation, any person found to be in breach of this policy, may be subject to disciplinary action or dismissal as outlined in the employee’s contract of employment.

If there is a situation where alcohol or other misuse may contribute to potentially significant safety, legal or performance events, the company will act responsibly to protect its employees, operations, customers and the community in which it operates.

Southern’s Water Technology also has the policy of carrying out drug and alcohol testing on potential or current employees in the following situations:
1. Pre-employment, as part of standard pre employment medical checks.
2. Randomly, at a time determined by management.
3. Post incident, to determine cause for an incident that has occurred.

This testing is carried out by a competent external medical contractor.

4.12. Fitness to work

Southern’s Water Technology has a duty of care to ensure a healthy and safe work place for all employees and its sub contractors. Southern’s Water Technology recognises that an individual’s fitness for work may be affected for a variety of reasons including the adverse effects of fatigue, stress, alcohol, or other drugs. Individuals who are unfit for work may pose a serious risk to the safety and health of themselves and others in the workplace. In accordance with the Southern’s Water Technology commitment to safety and health, individuals who are unfit for work may be required to discontinue the work they normally perform and after investigation, may be required to leave the workplace.

Consistent with this, the management of Southern’s Water Technology is committed to the following:
- Ensuring personnel are fit for work.
- Preventing and minimising the adverse effects of fatigue, work conditions, and excessive hours of work.
- Supporting and providing appropriate assistance to overcome problems that could impair fitness for work.
- Promoting physical, mental and emotional health, so personnel can safely undertake and sustain work.
- Monitoring compliance and enforcement of this policy and its’ procedures, including drug and alcohol testing if necessary.
- Providing consistent, effective and fair procedures for dealing with people who are unfit for work.
5. REFERENCES/ ACKNOWLEDGMENTS

The following documents have been referenced and are acknowledged in the development of this plan.

- EMRC Safety Management Plan (Summary Version).
7. **Appendix 2 – JSEA Form.**

See attached.