



BULK TRANSPORT OPERATIONS MANUAL



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1 INTRODUCTION

This Operations Manual contains important information concerning the policies of Bulk Transport Solutions Pty Ltd (BTS) regarding, statutory regulations, safety awareness, company image and other issues affecting you and your workplace environment both as a BTS employee and subcontractor. As part of your company induction you will be introduced to the BTS Occupational, Health, Safety and Rehabilitation (WHS&R), Environmental and Quality Management Systems. All these system require all employees and subcontractors to comply with operating procedures designed to maintain the required levels of customer service in accordance with all BTS policies.

2 PURPOSE

BTS aims to provide a safe and healthy working environment and safe systems of work.

This Operations Manual outlines the procedures that are used by BTS to comply with the NSW Work Health & Safety Act 2011 and the National Heavy Vehicle Law.

This Operations Manual applies to ALL persons engaged by or working for BTS as an employee or subcontractor.

This Operations Manual does not specify prescriptive driving hours.

3 POLICIES

3.1 OCCUPATIONAL HEALTH & SAFETY POLICY

The occupational health and safety goal of Bulk Transport Solutions Pty Ltd (BTS) is the prevention of any work related injury or illness to our employees, subcontractors, customers and the general public. To achieve this goal we will ensure that management, supervisory, personnel and subcontractors are suitably trained in health and safety management. All BTS personnel and subcontractors are expected to be committed to our goal as health and safety in the workplace is a shared responsibility.

The BTS integrated management system was established with particular focus on achieving best practice in occupational health and safety management. All personnel are trained to use our management system to ensure they identify risk associated with work activities and implement suitable control measures as a priority. BTS will secure best practice in health and safety to ensure the welfare of all persons during the provision of our services by:

- Ensuring excellent leadership is demonstrated at all times;
- Regularly consulting with employees and subcontractors on health and safety issues;
- Providing and maintaining safe plant and equipment suitable for their intended purpose;
- Clearly defining responsibilities and accountabilities for all our employees and subcontractors;
- Providing adequate information on site, training and supervision;
- Applicable licencing, registration and certification requirements are complied with;
- Implementing strategies for the safe handling, storage and transport of hazardous products;
- Allocating necessary resources and support to all our operations;
- Identifying potential safety hazards and implementing suitable control measures;
- Developing health and safety awareness amongst all our employees and subcontractors;
- Regularly monitoring and auditing our health and safety performance;
- Identifying corrective actions to improve our health and safety performance; and
- Establishing measurable targets to quantify our health and safety performance.

All personnel working on BTS operations are required to acknowledge their individual obligations and responsibilities with respect to health and safety issues. In addition, all personnel are encouraged to recognise their collective responsibilities to ensure they contribute to health and safety in a positive manner for others in the workplace. Specific information relating to health and safety will be made available and communicated to all personnel.

BTS provides this Occupational Health and Safety Policy to all our personnel, subcontractors and customers as a statement of the company's commitment to achieve our health and safety goal.

A handwritten signature in black ink, appearing to read 'Ricci Camilleri', is written over a light blue horizontal line.

Ricci Camilleri
Managing Director
OH&S Management Coordinator

3.2 ENVIRONMENTAL POLICY

The environmental goal of Bulk Transport Solutions Pty Ltd (BTS) is the prevention of any incident that would adversely impact the local environment where we conduct our operations. To achieve this goal we ensure that management, supervisory, personnel and subcontractors are suitably trained in environmental management. BTS will always maintain a commitment to providing its services in a sustainable manner with all personnel and subcontractors expected to be committed to our goal as environmental care is a shared responsibility.

BTS is committed to the protection and conservation of the environment. This commitment is both a fundamental component of the practical and sustainable manner in which we conduct our operations. To uphold this commitment BTS will:

- Conduct activities in an environmentally responsible and competent manner;
- Develop environmental awareness within the company;
- Continually improve our environmental performance;
- Comply with all legislation and guidelines as stipulated by regulatory authorities;
- Encourage recycling when conducting projects;
- Utilise new technologies to operate in a sustainable fashion;
- Encourage our suppliers to achieve a high level of environmental performance;
- Periodically review project specific environmental objectives and targets;
- Promptly implement preventative and corrective actions when identified; and
- Mitigate the potential for pollution or other adverse environmental impact.

The BTS integrated management system was established with particular focus on achieving best practice in environmental management. All personnel and subcontractors will be trained in and use this system to ensure that BTS meets its environmental goal. They will achieve this by identifying environmental risk associated with work activities and implementing suitable control measures as a priority. Specific information relating to the environment will be made available and communicated to all personnel who are required to acknowledge their individual environmental obligations.

BTS provides this Environmental Policy to all our personnel, subcontractors and customers as a statement of the company's commitment to achieve our environmental goal.

A handwritten signature in black ink, appearing to read 'Ricci Camilleri', is positioned above the printed name and title.

Ricci Camilleri
Managing Director
Environmental Management Coordinator

3.3 QUALITY POLICY

Bulk Transport Solutions Pty Ltd (BTS) will operate its business in a manner that consistently meets or exceeds the quality standards set by affected stakeholders such as customers, industry regulators and the communities within which our operations are conducted. Our approach to quality extends to working with suppliers to ensure delivery of required products and services. BTS works to ISO 9001 standards and integrates our quality philosophy into our company culture. The elements in our quality system are based on the requirements of ISO 9001 Australian Standards to ensure that a high level of quality is our core focus be it handling material, information or people.

BTS adopts a best practice system for the document management that enables auditing of documents from creation to withdrawal. This ensures good quality control over the currency and adequacy of published documents. BTS' implementation of good records management practices will ensure business is conducted in an orderly, efficient and accountable manner and supports compliance with statutory obligations.

BTS is committed to continuously improving the quality of the services provided and will always:

- identify the changing needs and expectations of our customers;
- maintain processes and procedures which ensure these changes are accommodated;
- provide services on time and at the lowest cost;
- provide an employment environment where continuous improvement is encouraged; and
- train all personnel and subcontractors to act in accordance with the requirements of this policy.

The success of BTS will be measured against the degree to which our customers and stakeholders are satisfied with the quality of our work produced. BTS provides this Quality Policy to all personnel, subcontractors and customers as a statement of commitment to achieve our quality assurance goal.

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Ricci Camilleri
Managing Director
Quality Management Coordinator

3.4 REHABILITATION & RETURN TO WORK POLICY

Bulk Transport Solutions Pty Ltd (BTS) recognises that there are substantial benefits to be gained from rehabilitation principles and practices and is committed to implementing them at this workplace. BTS recognises that the *Workers' Compensation and Rehabilitation Act 2003* and the *Workers' Compensation and Rehabilitation Regulation 2003* provide the legislative support for workplace rehabilitation activities.

BTS experience has shown that workplace rehabilitation assists the healing process and helps restore the worker's normal function sooner. Workplace rehabilitation includes early provision of timely and adequate services, including suitable duties programs, and aims to:

- maintain injured or ill workers at work or;
- ensure the worker's earliest possible return to work or;
- maximise the worker's independent functioning and;
- provide for durable employment.

This policy has been developed as a joint worker-management agreement.

BTS is committed to:

- Providing a safe and healthy work environment, but in the event of an injury or an illness, making sure workplace rehabilitation is started as soon as possible in accordance with medical advice;
- Ensuring appropriate suitable duties are made available to injured or ill workers to facilitate their safe and early return to work. These duties must be consistent with the current medical certificate and will be time limited;
- Respecting the confidential nature of medical and rehabilitation information and ensuring there will be both verbal and written confidentiality;
- Ensuring all workers are aware that, in the event of injury or illness, they will be consulted to ensure a structured and safe return to work that will not disadvantage them;
- Complying with legislative obligations with respect to the standard for rehabilitation;
- Adopting a multidisciplinary approach to rehabilitation as required;
- Reviewing this policy and procedures at least every three years to ensure it continues to meet legislative requirements and the needs of all parties.

Workplace rehabilitation procedures have been developed to support this policy. The procedures define key terms, describe key roles and outline steps in the return to work process. A copy of the procedures is attached to this policy.

The aim of this BTS rehabilitation policy is to ensure:

- that a culture of acceptance for workplace rehabilitation exists;
- we have a process to support an early safe return of any worker who has an injury/illness;
- the position of the rehabilitation and return to work coordinator is adequately resourced; and
- adequate storage is provided for rehabilitation files to maintain confidentiality of this information.

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Ricci Camilleri
Managing Director
Rehabilitation and Return to Work Coordinator

3.5 DRUG & ALCOHOL POLICY

Bulk Transport Solutions Pty Ltd (BTS) does not permit employees or subcontractors to possess drugs on a work site or work vehicle other than prescription medication.

When taking prescribed medication, advice should be sought from each individual's doctor or pharmacist to ensure the medication will not affect their ability to perform their work duties. All employees and sub-contractors should advise their manager when taking any medication.

As alcohol remains in the body for several hours, it is suggested that employees and sub-contractors do not consume alcohol for at least eight hours before commencing work. BTS policy is for all employees and sub-contractors to have a zero blood alcohol level whilst working on site or driving a vehicle. Where a BTS manager or a BTS client's supervisor suspects a BTS employee or sub-contractor is under the influence of alcohol or drugs, the BTS manager will request that person to undergo testing by an approved doctor.

A handwritten signature in black ink, appearing to read 'Ricci Camilleri', is positioned above the printed name.

Ricci Camilleri
Managing Director

3.6 SMOKING POLICY

The objective of Bulk Transport Solutions' smoke free policy is to eliminate employee exposure to environmental tobacco smoke throughout the Company's workplaces, thus providing a healthier work environment and ensuring risks to all employees, contractors and visitors are minimised.

The inhalation of environmental tobacco smoke is a health risk.

The following areas are designated smoke free work environments and smoking is not permitted at any time by any person, including customers, contractors and visitors:

- All premises within a building or structure;
- All company vehicles;
- All areas where smoking could lead to risk of fire, explosion or damage.

Total smoking bans apply in some businesses for example, where risk assessments indicate the need.

Sites that choose to establish outdoor designated smoking areas shall ensure they are adequately delineated, a suitable distance from non-smoking areas, well ventilated and contain posted versions of this policy.

BTS employees and subcontractors must comply with any customer's policy whilst on the customer's site.

Information and support is available to any employee who wishes to undertake a smoking cessation program.

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Ricci Camilleri
Managing Director

3.7 FATIGUE MANAGEMENT POLICY

Bulk Transport Solutions Pty Ltd (BTS) will provide a fatigue management framework designed to ensure that all employees are fit for duty at all times. This framework will provide adequate opportunity for rest and recovery between days of work, shifts or trips to ensure performance is not impaired by fatigue.

BTS will use appropriate risk assessment tools (such as employee and sub-contractors, management education training programs) to measure, mitigate and monitor the risks associated with fatigue. In addition, mitigation strategies will be reviewed and audited to ensure compliance with Occupational Health and Safety requirements.

The BTS Fatigue Management Policy is designed to provide:

- Input from employee representatives, sub-contractors, and independent professionals;
- Appropriate management of risks associated with fatigue;
- Both employer, employee and sub-contractor responsibilities to ensure legal and OH&S compliance;
- Objective assessment of planned and actual rosters to identify and manage work-related fatigue issues;
- Induction, training and education designed to assist managers, employees and their families and sub-contractors in addressing fatigue.

BTS management, employees and sub-contractors have a shared responsibility to avoid fatigue related performance impairment:

- Employees and sub-contractors will ensure that, in the context of the performance required, their driver rosters allow adequate breaks for recovery between shifts;
- Individuals have a duty of care to ensure adequate sleep is obtained between shifts and out of hours activities do not cause fatigue or impair performance. When this is not the case, drivers have a further responsibility to report the matter to their supervisor/manager;
- At no time should drivers put themselves or others at risk.

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Ricci Camilleri
Managing Director

3.8 SEAT BELT POLICY

Bulk Transport Solutions (BTS) is committed to achieving high standards of safety at all its work locations, including all company and subcontractor vehicles. It is therefore BTS policy that all employees, contractors and others working for BTS wear seat belts when driving or travelling in vehicles on public and private roads, including off road and mobile equipment, heavy vehicles, forklift trucks, light commercials and sedans. Visitors to BTS client's sites are also required to comply with this policy. This rule does not apply when reversing at slow speed in confined areas.

Where seat belts are not currently fitted to a BTS vehicle or subcontractor engaged by BTS, the manufacturer's standard seat belt is to be fitted at the earliest opportunity.

BTS staff are not to enter into any agreement to hire, lease or purchase vehicles that are not fitted with appropriate seat belts. Vehicles that are provided without seatbelts will be returned to the supplier.

It is in a driver's interest to wear a seat belt, therefore, BTS policy goes beyond the minimum legal requirement and uniformly requires that all employees wear a seat belt when driving or travelling in a vehicle, regardless of the State / Territory or the type of vehicle.

Ensuring a safe workplace benefits everyone and safe workplaces can only be achieved when everyone participates and is committed, involved and contributing to improving safety.

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Ricci Camilleri
Managing Director

3.9 CHAIN OF RESPONSIBILITY POLICY

BULK TRANSPORT SOLUTIONS (BTS) does acknowledge that, there are vast external influences within the logistic and transport industry which we conduct or provide our services too. The company is guided by our objectives and responds to the supplier and clients expectations, always maintaining our involvement with other parties. Management is to complete training to ensure the required responsibilities are known and are adhered with by all staff and workers. Individual responsibilities are to be communicated to all relevant staff and workers within the business during the induction process.

Our commitment is to work aligned with the client's needs and other parties, focusing on improvement, whilst ensuring compliance to applicable CoR Law. All key elements are included, which demonstrates the company's preparedness by conducting ongoing internal Performance Management reviews and defining accountability.

AIMS AND OBJECTIVES

BTS endeavors to achieve the following-

- Complying with, applicable law, statutory requirements, regulations, codes and standards, customer/supplier needs and best practice;
- Communicating the obligations of the roles and responsibilities for management, workers and responsible parties in the supply chain and how these hold common responsibilities;
- Providing the necessary awareness, ongoing training, review, monitoring and commitment of directions taken or committed by managers and workers in their control;
- Ongoing review of internal practices that have influence on possible non-conformity of the HVNL.

Managers and Workers also have responsibility, which will include-

- Having knowledge of the strategies being applied by management internal and externally, to assess that processes implemented are affective;
- Ensuring our management team and workers are trained in the awareness of Mass, Dimensions, Fatigue, Alcohol and other Drugs, Load Restraint, Speeding, Standards and day to day commercial requirements of the industry we operate within;
- Internal reporting to be assessed vertically within the business by conducting performance reviews on all stakeholders;
- All persons directly employed or in control or can influence operation processes involving, are to be monitored and assessed to ensure ongoing conformance remains;
- Internal and external communication is undertaken regularly to demonstrate awareness and observations are being investigated and if required, these are to be addressed.

IMPLEMENTATION AND REVIEW

In fulfilling these aims and objectives, the team at **BULK TRANSPORT SOLUTIONS (BTS)** is responsible and committed to regular consultation with workers, clients and stakeholders. To ensure that Policy operates effectively and that documentation and data is periodically reviewed and conforms to the expectations of management.

A handwritten signature in black ink, appearing to read 'Ricci Camilleri', written over a light blue horizontal line.

Ricci Camilleri
Managing Director

4 CONTACT DETAILS

COMPANY	ADDRESS	CONTACT DETAILS
Bulk Transport Solutions Pty Ltd ABN 54 142 248 520	Unit 1, 103 Sargents Road Minchinbury NSW 2770 PO Box 4031 St Mary's East NSW 2760	Phone: 1300 337 477 Mobile: 0401 280 404 ricci@bulktransportsolutions.com.au www.bulktransportsolutions.com.au

4.1 EMERGENCY CONTACT INFORMATION

FIRE	000	or 112 from mobile phone
AMBULANCE	000	or 112 from mobile phone
POLICE	000	or 112 from mobile phone

Poisons Information Centre	Emergency		131 126
NSW Department of Environment, Conservation, Climate Change & Water (NSW DECCW) i.e. EPA	Pollution Incidents Line		131 555 or (02) 9995 5555
WorkCover Authority	Switchboard Dangerous Goods Line		131 050 or (02) 4321 5000
Sydney Water – Sewerage	24 hour	Emergency	132 090
Sydney Water – Water	24 hour	Emergency	132 090
Sydney Water Community Relations	24 hour	Switchboard	132 092
Integral Energy	Emergency	24 hour emergency	131 003
Energy Australia	Emergency	24 hour emergency	131 388
AGL (Gas)	Emergency	24 hour gas emergency	131 245
Telstra	Cable damage	Cable damage hotline	132 203
Syringe Management	Syringe Hotline		1800 633 353

5 APPLICABLE REGULATIONS, STANDARDS AND CODES OF PRACTICE

BTS will carry out bulk transport operations in accordance with applicable codes of practice, guidelines and standards including the following:

- National Occupational Health and Safety Commission Code of Practice for the Safe Removal of Asbestos, NOHSC: 2002 (2005);
- National Occupational Health & Safety Commission, "Synthetic Mineral Fibres, National Standard [NOHSC: 1004(1990)] and National Code of Practice [NOHSC: 2006(1990)];
- Guide to Working with Asbestos (NSW WorkCover) March 2003;
- AS/NZS 1715-1994 Selection and use of Respiratory Devices; and
- AS/NZS 1716 -2003 Respiratory Protective Devices;
- Dangerous Goods Act (1975) and Regulations (1999);
- NSW Environmentally Hazardous Chemicals Act (1985);
- ANZECC "Polychlorinated biphenyls Management Plan November 1996;
- Environmentally Hazardous Chemicals Act, 1985: "Chemical Control Order in Relation to Materials and Wastes containing Polychlorinated Biphenyls (PCB), June 1997;
- Australian and New Zealand Environment Conservation Council, "*Polychlorinated Biphenyls Management Plan, November 1996*"; and
- ANZECC (1997) Identification of PCB – Containing Capacitors, Information Booklet for Electricians and Electrical Contractors.

6 APPLICABLE STATUTORY ACTS AND MANAGEMENT GUIDELINES

BTS will carry out all bulk transport operations in accordance with all applicable legislation including the following:

- *NSW Environmental Guidelines: Assessment, Classification & Management of Liquid and Non-liquid Wastes 2008* as published by the NSW Department of Environment, Climate Change and Water (NSW DECCW) consisting of Part 1 (Classifying Waste), Part 2 (Immobilisation of Waste), Part 3 (Waste Containing Radioactive Material) and Part 4 (Acid Sulfate Soils);
- The Protection of the Environment Operations Act 1997 (the POEO Act);
- The Protection of the Environment Operations Regulation 1996 (Waste Regulation);
- *The Protection of the Environment Operations* (Excavated Natural Materials Exemption 2008);
- NSW DECCW *Waste and Environment Levy* (Operational Guidance Notes);
- NSW DECCW Waste Transport and Storage;
- NSW DECCW Waste Avoidance and Resource Recovery;
- NSW DECCW Waste Tracking Arrangements;
- *The Acid Sulfate Soils Management Guidelines* as published by the Acid Sulfate Soils Management Advisory Committee (ASSMAC), NSW Agriculture;
- *The Acid Sulfate Soils Assessment Guidelines* as published by the Acid Sulfate Soils Management Advisory Committee (ASSMAC), NSW Agriculture;
- *The Acid Sulfate Soils Drainage Management Guidelines* and *The Acid Sulfate Soils Remediation Guidelines* as published by the Department of Land and Water Conservation, NSW. and the NSW Department of Urban Affairs and Planning;
- The National Environment Protection (Assessment of Site Contamination) Measure 1999 (NEPM) as published by the National Environment Protection Council;
- *The Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2000* as published by the Australian and New Zealand Environment and Conservation Council and the Agriculture and Resource Management Council of Australia (ANZECC / ARMCANZ); and
- Soil and Construction, Managing Urban Stormwater (Volume 1, Landcom 4th edition 2004).

7 ORGANISATIONAL STRUCTURE

Bulk Transport Solutions is an Australian Proprietary Company. Bulk Transport Solutions office is located at 1/103 Sargents Road, Minchinbury NSW 2770. The sole office holder is BTS' Managing Director Ricci Alan Camilleri born on 24 December 1976. Ricci is supported by his wife Kylee Camilleri in an administrative role.

8 RESPONSIBILITIES

8.1 MANAGING DIRECTOR

Ricci Camilleri is the Managing Director of BTS. He is responsible for:

- The implementation of the Health & Safety Policy, Fatigue Management Policy, Drug and Alcohol Policy and the Return to Work Policy;
- Defining responsibilities of personnel responsible and qualified for OHS&R matters;
- Identification of system verification requirements and allocation of human, technical and financial resources adequate to meet those needs;
- To ensure that safe working practices and procedures are implemented and adhered to;
- Managing compliance with OHS&R legislation, regulations, standards and codes;
- Acquiring and disseminating OHS&R information;
- Investigating incidents and accidents and initiating corrective (preventative) actions;
- The development and implementation of emergency procedures;
- Ensuring compliance with safe working rules;
- To ensure that safe working practices and procedures are implemented and adhered to;
- To support and assist with the rehabilitation of employees who have been injured at work, by encouraging their early return to normality through work based rehabilitation programs;
- To encourage reporting of all incidents and mishaps as well as accidents and injuries. Ensure the appropriate forms are completed and investigate all reported events;
- Reporting accidents to the insurer;
- To ensure that plant and equipment is maintained in a safe condition, with guards and safety devices in place and a regular program of maintenance established.

8.2 SCHEDULER / ALLOCATOR

Schedulers are responsible for:

- Verifying that drivers can legally deliver the load before scheduling the journey;
- Monitoring drivers daily worksheets, to ensure that the drivers are complying with their work/rest requirements, Pre-trip checks and Fitness for Duty Declarations;
- Complying with WHS, Fatigue and other management procedures with knowledge of CoR.

8.3 SALES MANAGERS

Sales Managers are responsible for:

- Ensuring that all work that is engaged through the Sub-contractors is done so in line with BTS safe working practices and procedures and aligned with the BTS Subcontractor Engagement (section 9) and the BTS Subcontractor Management procedure (section 9.1);
- Ensuring that all Subcontractors that are engaged by BTS have completed all documents that exist as part of BTS' Subcontractor Engagement procedure and provided all supporting documents to ensure that they are acknowledged as an "Approved Subcontractor" prior to any works being conducted on behalf of BTS. Once a Subcontractor has been approved to provide Transport Services to BTS, the Sales Manager will enter them into the [BTS Approved Subcontractor Register](#);
- Ensuring all Subcontractors are issued with the required documentation and/or information to fulfil the project/job/load safely and compliantly with regard to WHS, CoR or EPA obligations or client expectations, and that all documentation such as signed SWMS, SOP's, Management Plans and Risk Assessments are reviewed and retained as evidence of consultation with subcontractors and workers.
- Ensuring all subcontractors are issued with the appropriate instruction and information necessary to safely carry out any high-risk work such as contaminated loads and materials handling assessment sheets, and that all instructed procedures and protective equipment is made available and followed as outlined.
- Within the BTS Organisational Structure the Sales Manager also plays a supporting role to the Scheduler and will perform some scheduling duties from time to time as and when required.

8.4 DRIVERS

Drivers are responsible for:

- Ensuring that they are fit for work free from alcohol or drugs;
- They are rested prior to starting work;
- Monitoring their own performance and taking regular periods of rest to avoid continuing to work when tired;
- Providing BTS with copies of their current Heavy Vehicle Drivers Licence and immediately notifying the BTS Scheduler of any changes to their licence i.e. Suspension, Cancellation, Loss of Licence etc.

Scheduler of any changes to their licence i.e. Suspension, Cancellation, Loss of Licence etc.

- Providing BTS with an up to date Medical, stating the drivers fitness to drive a Heavy Vehicle;
- Inspecting their vehicle prior to start-up and reporting any mechanical failures.

8.5 EMPLOYEES

a) Each BTS employee is responsible for:

- Conducting work according to established safe practices and procedures, to protect themselves as well as fellow workers from injury;
- Ensuring they utilise stipulated Personal Protection Equipment (PPE) when working;
- Reporting (formally) all incidents;
- Assisting in incident investigations and audits as needed;
- Identifying and reporting safety hazards and correcting those that they can without endangering themselves or others.

8.6 SUBCONTRACTORS

- a) BTS subcontractors shall abide by all the company's policies and procedures and applicable Commonwealth, State and local safety rules and regulations in order to prevent injury to persons or damage to property.
- b) In addition, subcontractors shall:
 - Ensure job/machine specific operating procedures and safety process are in place;
 - Ensure all their employees are trained in those specific job/machine procedures and process;
 - Perform all work in a safe manner;
 - Provide appropriate safety equipment for their employees to perform their specific job functions (PPE etc);
 - Report all incidents and injuries, regardless of severity, immediately to their Supervisor or Manager;
 - Hold pre-job safety meetings to discuss hazards pertinent to the job at hand and the measures to be taken to mitigate those hazards.
- c) BTS Subcontractors are required to forward all documentation and records as reasonably requested by BTS, as outlined throughout the subcontractor engagement process and ongoing commercial relationship, to ensure BTS Subcontractors are implementing and maintaining satisfactory systems and procedures relevant to WHS, CoR and Environmental obligations.

9 SUBCONTRACTOR ENGAGEMENT

As part of BTS' Subcontractor Engagement procedure, all subcontractors are expected to complete and return the [BTS Subcontractor & Supplier Registration Questionnaire](#) along with all supporting documents and records as requested within the [Standard Forms](#). Once these documents have been reviewed by BTS Management and the subcontractor has been assessed, BTS will then issue a [BTS Transport Services Agreement](#) form be sent to the subcontractor and signed and returned to BTS.

BTS is aware that some subcontractors may not have in place all of the items being requested of them and as such, request that these companies, at a minimum supply the following documents as and when requested by BTS:

- Provide BTS with all supporting documents regarding driver competency, licences, current RMS driving record (where applicable), current Medical stating Fitness to Operate a Heavy Vehicle and any other supporting documents as and when requested by BTS.
- Some sub-contractors where requested may need to provide copies of their Daily Worksheets and or Work Diary pages for review by BTS to ensure compliance with HVNL and their work/rest requirements.
- A Heavy Vehicle Driver Assessment will need to be conducted at least every 3 years for owner drivers and will also be part of the [BTS Subcontractor & Supplier Registration Questionnaire](#).

These companies who are unable to supply the documents and records being asked of them, may need to be inducted into the BTS Transport Operations System to become compliant, with some ongoing training required. BTS may request that further records be supplied by the subcontractors periodically and as Industry legislation requires.

9.1 SUBCONTRACTOR MANAGEMENT PROCEDURE

PURPOSE

For the external engagement of heavy vehicles by **BTS**, including:

- Low Loader
- B-Double
- Truck and Dog Trailer
- Semi-tipper
- Fuel Truck
- Water Cart
- Other heavy vehicle types as required.

This Procedure reflects the complex regulatory framework associated with the use of heavy vehicles as listed in “References” below. It addresses each of these requirements by identifying tasks and assigning responsibility so that the Chain of Responsibility obligations are effectively achieved throughout the process.

DEFINITIONS

Sales Manager: *is the BTS person who has been nominated to control the engagement and management of Subcontractors.*

Allocator: *is the BTS person who requires the Subcontractor’s service and usually directs and controls the Subcontractor.*

LEGISLATION AND REFERENCES

WHS

Work Health & Safety (WHS) Act 2011
Work Health & Safety (WHS) Regulation 2011

Road Transport

Interstate Road Transport Act 1985
Roads Act 1993
Road Transport (Vehicle Registration) Regulation 2007
Road Transport (Driver Licensing) Act 1998
Road Transport (Safety and Traffic Management) Regulation 1999
Road Transport (General) Act 2005
Road Transport (General) Regulation, 2005
Road Transport Act, 2013
Heavy Vehicle National Law (HVNL)

ACTIONS

General

Within the BTS business structure, personnel may have a need to engage an external transport Subcontractor (heavy vehicle and Driver). This Procedure shall be applied in all circumstances although the Managing Director has authority to make determinations in special cases.

Also the Sales Manager provides a selection and engagement service to all businesses that ensures full compliance with regulatory requirements.

Before being used for any work, the engagement of a transport Subcontractor shall be approved by the Sales Manager.

Selection

Subcontractors that have been assessed by BTS as being suitable for engagement are listed on the Transport Subcontractor Database that is maintained by the Sales Manager. They may already be signed to a period contract to facilitate engagement.

Prequalified Subcontractors can be contacted to confirm capability, availability and price.

For a Subcontractor that is not prequalified a capability assessment shall be done before considering it further or offering any work.

Assessment

Form [BTS Subcontractor & Supplier Registration Questionnaire](#), shall be completed by the person considering the Subcontractor for work (**Allocator**). All mandatory requirements that are highlighted on the form must be satisfactorily addressed and evidence provided before a Subcontractor can be recommended for work.

Completing the form in full and satisfactorily addressing all requirements enables the Subcontractor to be prequalified for a period up to 12 months, so negating the need for further assessment in that time.

Where an assessment shows some deficiencies, a Subcontractor may still be considered by adopting BTS' system to cover the gap. Records of additional training in the relevant parts of BTS' system given to the Subcontractor shall be kept in the BTS Approved Subcontractor Register.

Prequalification

Prequalification of a transport Subcontractor is done following a recommendation by the Allocator and approval by the Sales Manager, or the Managing Director.

Early assessment and prequalification gives BTS ready access to a pool of Subcontractors whose capability is known and business details have been registered in BTS' financial system. The Sales Manager may offer prequalified Subcontractors the option of a period contract to facilitate future engagements.

Prequalification applies for a period up to 12 months but this is at the discretion of the Sales Manager having regard to the Subcontractor's assessment and the risks that exist in the type of work. Re-assessment shall be arranged by the Sales Manager and done before renewing a Subcontractor's prequalification.

Engagement

Only Subcontractors who have been satisfactorily assessed or are currently prequalified shall be considered for work.

Engagement of a transport Subcontractor that is not prequalified shall be approved by the relevant Sales Manager on form [BTS Subcontractor & Supplier Registration Questionnaire](#).

Particular attention shall be given to ensuring that the Subcontractor understands the work and the risk controls that apply. A written record of the instructions given to the Subcontractor shall be kept by the Allocator.

Once a Subcontractor has completed and returned the [BTS Subcontractor & Supplier Registration Questionnaire](#), and BTS have deemed the Subcontractor compliant BTS will then provide the [BTS Transport Services Agreement](#) to be populated, signed and returned to BTS to finalise the engagement. Upon receiving all of the above-mentioned documents BTS shall populate and upload all relevant Subcontractor information into the [BTS Approved Subcontractor Register](#). This information shall be monitored by BTS internally to ensure that critical items such as Vehicle Registration Expiry dates and Certificate of Currency expiry dates are managed.

Depending on the level of compliance demonstrated, prequalified subcontractors will be engaged as either Managed Subcontractors or Qualified Subcontractors.

■ **Managed Subcontractor** – company policies/procedures/management system does not fully meet BTS standard, and therefore the operator must work under the BTS Management System. This is only suitable for smaller operators with less than 5 trucks/drivers where BTS is comfortable to manage themselves. This category of subcontractor need to be treated as if they are direct employees of BTS.

■ **Qualified Subcontractor** - company policies/procedures/management system is considered robust and acceptable. BTS is comfortable the company can demonstrate it is complying to WHS and CoR obligations. Monthly declarations and an annual audit are to be conducted to confirm continued acceptance.

There are three options for engagement:

1. A prequalified Subcontractor that is on a current period contract may be engaged immediately by any authorised person subject to the terms of their contract.
2. Before beginning any work a prequalified or satisfactorily assessed Subcontractor can be offered a job specific contract. In particular, this applies to work that has special requirements outside the normal scope or shows a high level of risk.
3. Urgent, one-off engagements, may be done by Purchase Order subject to:
 - a satisfactory assessment
 - approval by the relevant Managing Director
 - acceptance of standard contract terms and conditions
 - close supervision by the BTS Allocator.

Use and Monitoring

Work done by a transport Subcontractor shall be directed and monitored by the BTS Allocator.

Truck movements on work sites are described in the Nominated Site Inductions and Procedures and should be read in conjunction with this section. The specific site inductions i.e. Boral, Holcim, Hanson etc. outline the obligations that apply to transport Subcontractors including compliance with the following:

- Driver and vehicle compliance records
- Site induction
- Awareness of risks
- Briefing in SWMS
- Site communication methods
- Site contact person
- Incident and emergency response
- Access & egress
- Load / unload details
- Time constraints
- Spill kit in vehicle

On work sites monitoring is done by the Site Supervisor and Non-compliance by any Subcontractor is communicated to BTS.

Monitoring of road transport operations is done by the Allocator for compliance with:

- Road rules
 - intercept report
 - traffic infringement
 - complaints from clients or public
- Fatigue Management, which may involve monitoring of;
 - Standard Hours
 - Basic Fatigue Management
 - Advanced Fatigue Management
 - timesheet
 - Work Diary pages
- Work schedules
 - direct communication with Driver and client
 - Work Diary pages

and records are kept on the Subcontractor file.

A Subcontractor may be requested to submit a [Monthly Subcontractor Declaration](#) to BTS to ensure ongoing compliance management and that Chain of Responsibility and WHS requirements are being fulfilled.

REVIEW AND AUTHORISATION

Performance Assessment

A review of the Subcontractors work performed may be conducted at the conclusion of each subcontract, i.e. annually for a period Subcontract. The report may be discussed with the Subcontractor particularly where there are deficiencies and shall include approval to retain or de-register the Subcontractor from BTS' prequalification list.

Subcontract Close

Final statements will be required to close the Subcontract and approve final payment. The Allocator should carefully examine a Subcontractor's final claim to make sure that all items are included and confirm satisfactory performance with the Site Supervisor.

The WHS Management Coordinator or nominee is responsible for the maintenance and review of this procedure.

The distribution of this procedure is only permitted, after the Managing Director has reviewed and authorised it.

Reviewed by:	Position	Signature	Date
Anne Bostock	Sales Manager		16/06/2017
Authorised by:	Position	Signature	Date
Ricci Camilleri	Managing Director		16/06/2017

ASSOCIATED DOCUMENTS AND PROCEDURES

**10
DOCU
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CONT
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TITLE	Document reference No.	Date reviewed
Subcontractor & Supplier Registration Questionnaire	Ver. 7.2	Feb 2017
Transport Services Agreement	Ver. 2.0	July 2016
Subcontractor Monthly Declaration	Ver. 1.1	Sep 2016

- a) The BTS Managing Director is responsible for ensuring that controls are in place to ensure that the organisation is using the most current version of all documents;
- b) Each document shall have a unique title and its revision date;
- c) Details of each revision to this document shall be recorded on the Amendment Register;
- d) Each copy of this document shall be given a unique copy number. The copy number and the person to whom the manual is.

11 CONSULTATION

- a) BTS recognises that the involvement of workers is essential in managing fatigue and identifying potential hazards that can be eliminated, or minimised, before injuries occur;
- b) Tool Box Talks will be used to help the Managing Director and other BTS supervisor staff manage safety and fatigue, to provide a forum for workers to have their say about safety issues and to help ensure safety awareness is maintained throughout the company;
- c) Where required specific safety issues will be raised, accidents reviewed, Safe Work Method Statement developed and presented for evaluation and familiarisation or safety alerts discussed;
- d) Records of Tool Box Talks shall be made on the Tool Box record. Refer Appendix.

12 TRAINING

- a) All employees shall be inducted upon joining BTS. This will entail staff being given a copy of this manual and having the contents explained by a member of management. Once the employee is conversant with the contents of the manuals they will sign off on the Driver Register, Medical and Licence Matrix. Refer Appendix.
- b) BTS is committed to ensuring that all staff including drivers are competent to perform their tasks, including:
 - Fatigue management and health issues;
 - Road rules and the relevant statutory legislation;
 - Safe work practices;
 - Company and work site inductions.

13 LICENCES

- a) All drivers shall hold current and valid driver's licences and where required, forklift/crane licences;
- b) Drivers must inform the Managing Director if their licence has been withdrawn for speeding, accumulated demerit points or any other reason;
- c) Licence details shall be recorded on the Driver Register, Medical and Licence Matrix. Refer Appendix;
- d) A record of individual training and competency will be maintained. Refer Appendix.

14 FATIGUE MANAGEMENT

14.1 MONITORING DRIVER HEALTH & SAFETY

14.1.1 HEALTH ASSESSMENTS

- a) BTS will ensure that drivers are fit and healthy for work by implementing the following:
 - Drivers shall undergo appropriate medical assessments every year;
 - Lifestyle information/counselling is available to assist drivers presenting in a fit state and to promote health management.
- b) Medicals shall be recorded on the Driver Register, Medical and Licence Matrix. Refer Appendix.

14.1.2 FITNESS FOR WORK

- a) Drivers are required to report to work well rested, physically able and mentally alert to perform their duties. The Managing Director must be advised if a driver is unfit for work.

14.2 SCHEDULING

- a) BTS will ensure that all driver rosters are prepared having due regard to the Fatigue Management regulations. Consideration shall be given to the following:
 - Keeping schedules as regular and predictable as possible;
 - Allowing for non-driving duties;
 - Building in time to allow drivers to meet normal living requirements and commitments;
 - Planning trips to allow as much sleep at night as possible;
 - Building in time to adjust from a return from a break or from day to night driving;
 - Scheduling trips to allow for adequate rest breaks;
 - Scheduling trips within working time limits and allowing for possible delays;
 - Driver to be given time to plan for long shifts;
 - Consideration is given to increased risk factors between 1am and 6am;
 - Drivers should have at least two 24-hour periods of rest in every 14 days;
 - Drivers need to take at least six hours rest in any twenty four-hour period.
- b) To assist in achieving compliance with the above, a Fatigue risk assessment shall be carried out. Refer Risk Assessments in Appendix.
- c) The Fatigue Risk Assessment shall be reviewed at least every 12 months or when new equipment, routes or processes are introduced. The Risk Assessment shall be signed and dated as evidence of the review.

14.3 DRIVING HOURS

- a) The following are the regulated driving hours for vehicles above 12 tonnes GVM:

IN ANY PERIOD OF:	A DRIVER MUST NOT DRIVE AND WORK FOR MORE THAN A TOTAL OF:	AND MUST HAVE A REST PERIOD OF NO LESS THAN:
5 hours and 30 minutes	5 hours	30 minutes, either in one period or as two periods of 15 minutes each
24 hours (any period of 24 hours)	14 hours (maximum 12 hours driving)	10 hours, including one continuous period of 6 hours. (These continuous rest periods must be taken away from the vehicle unless the vehicle is fitted with an approved sleeper berth.)
168 hours (1 week)	72 hours	96 hours, including one continuous period of 24 hours. (Must be taken away from vehicle.)

14.4 RISK ASSESSMENTS

- a) A risk assessment will be carried out initially for fatigue and for regular trips, and for each new route/task or when an operating factor varies.
- b) Risk assessments for regular trips will be repeated as part of the review of this fatigue management system. Refer Appendix.

14.5 LOG BOOKS/DRIVERS TIME SHEETS

- a) In addition to regulatory requirements regarding National Driver Log Books, each driver shall keep a record of their daily work schedules.
- b) A Time Sheet shall be completed by drivers and retained by management for a period of 5 years. Refer Appendix.

14.6 JOURNEY PLANS

- a) If a journey will exceed 500 kilometres to transport freight by means of a heavy truck (whether by means of a single journey or a series of journeys) more than 500 km, including any part of the journey or journeys, where no freight is transported because the heavy truck is being driven to collect freight or to return to base after transporting freight) the driver must complete a “Journey Plan”. The “Journey Plan” records driving, working and rest times. If the driver travels beyond a 100 km radius a National Driver Log Book will also need to be completed. Refer Appendix.

14.7 VEHICLE STANDARDS

- a) BTS will ensure vehicle standards meet the regulatory requirements. In addition BTS will:
- Provide vehicles and other accommodation with appropriate facilities for rest. Schedulers must ensure that vehicles used for long haul trips have appropriate sleeping facilities in accordance with Australian Standards or that other appropriate accommodation is provided along the way;
 - Provide air conditioned vehicles where possible;
 - Provide a working environment that meets Australian Standards for seating and sleeping accommodation;
 - Provide appropriate, comfortable sleeper berths in vehicles.

15 VEHICLE MAINTENANCE & INSPECTIONS

15.1 PRE-START INSPECTIONS

- a) Drivers shall inspect their vehicle prior to start-up using the Pre-start Inspection Checklist – Refer Appendix. A copy of the form shall be kept for a period of 5 years.

15.2 MAINTENANCE

- a) Drivers shall report any vehicle faults using the Mechanical Repairs Request sheet – Refer Appendix. The form shall be given to the workshop supervisor who will then schedule the repairs;
- b) Company vehicles (prime movers and trailers) will be serviced/maintained in accordance with manufacturer's recommendations by a qualified mechanic;
- c) Service and inspection records shall be kept for a period of 5 years;
- d) A copy of the maintenance work that was carried on the Mechanical Repairs form is to be left in the driver's cabin.

16 MASS AND DIMENSION LIMITS

- a) Gross vehicle mass shall be verified at a weighbridge by using on vehicle mass measurement equipment or by use of gauges on loading equipment.

17 LOAD RESTRAINT

- a) Load shall be restrained in accordance with the National Load Restraint Guide.
- b) Drivers should ensure that all restraint equipment is in a serviceable condition prior to commencing a trip. Loads should be checked frequently on the journey to ensure adequate restraint. Loose restraint equipment on the trailers shall not be left unrestrained on trailers.
- c) A safety check must be done at each driver rest stop, checking at least the following:
 - Tyres
 - Couplings
 - Lights
 - Oil or water leaks
 - Load and load restraint.

18 SAFETY

18.1 HAZARD IDENTIFICATION AND REPORTING

- a) All BTS employees and subcontractors have a responsibility under the OH&S Act 2000 to identify, report, and where able, rectify hazards in the work environment;
- b) If a hazard is identified that cannot be immediately rectified, the manager should be informed, so that action can be taken to control or eliminate the hazard.

18.2 RISK ASSESSMENTS

- a) The WHS Regulation 2011, specifies that Risk assessments should be undertaken for all processes, equipment and tasks at your place of work.
- b) A risk assessment shall be carried out using the Risk Assessment form – Refer Appendix.
- c) The following matrix shall be used to assess risks Items in *(Red)* relate to fatigue:

CONSEQUENCES		LIKELIHOOD	
1	Fatality or permanent disability AND/OR damage in excess of \$500k AND/OR a loss of more than 24 hours of production. <i>(Very high level of fatigue causing serious impairment and or leading to sleep.)</i>	A	Common. (Fatigue is expected to occur in most circumstances.)
2	A major injury AND/OR damage between \$100k and \$500k AND/OR between 8hrs and 24 hours lost production. <i>(High level of fatigue causing significant impairment.)</i>	B	Has Happened. (Fatigue will probably occur in most circumstance.)
3	A medical treated injury AND/OR damage between \$50k and \$100k AND/OR between 4 hours to 8hrs lost production. <i>(Medium level of fatigue will cause moderate level of impairment.)</i>	C	Could Happen. (Fatigue should occur at some time.)
4	A first aid treatment AND/Or \$5k to \$50k damage AND/OR 1 hour to 4 hours lost production <i>(Low levels of fatigue not affecting activity.)</i>	D	Not likely to happen. (Fatigue could occur at some time.)
5	A near hit AND/OR damage under \$5k AND/OR 1 hour delay. <i>(No affect on activity.)</i>	E	Practically impossible. (Fatigue may occur only in exceptional circumstance.)

	A	B	C	D	E
1	1	2	4	7	11
2	3	5	8	12	16
3	6	9	13	17	20
4	10	14	18	21	23
5	15	19	22	24	25

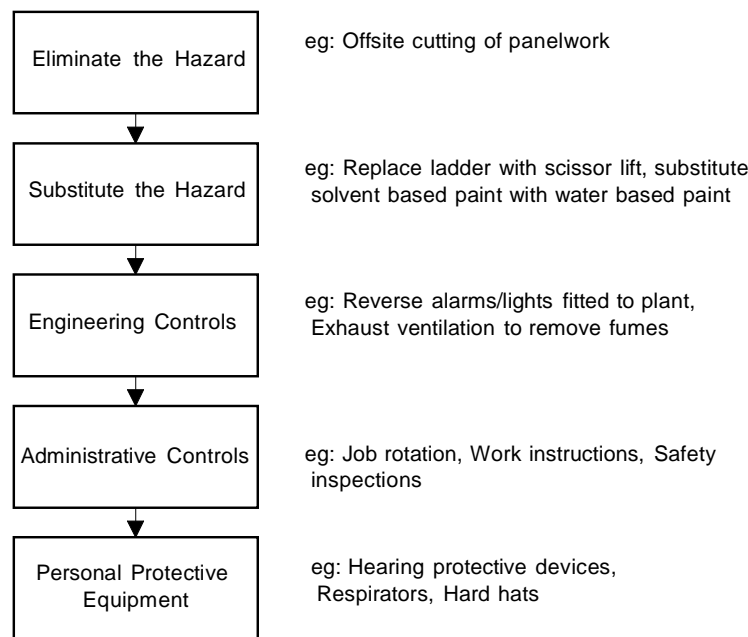
HIGH = 1 - 10

MEDIUM = 11 - 15

LOW = 16 - 25

18.3 CONTROLS

- a) Once a hazard has been identified, the company shall take the actions necessary to eliminate or control the risk;
- b) Control measures, in accordance with the risk management Hierarchy of Controls (i.e. eliminate, substitute, reduce, isolate, protect), shall be implemented, to effectively manage identified and assessed risks;
- c) Hierarchy of Controls:



18.4 SAFE WORK METHOD STATEMENTS

- a) The preparation of a Safe Work Method Statement (SWMS) involves identifying potential hazards, assessing their risk and recording how to eliminate, or minimize, the risk to worker safety;
- b) Safe Work Methods shall include:
 - The name of the company;
 - A description of the work activity or task to be undertaken;
 - The date the SWMS was developed;
 - The name and signature of the person who developed the SWMS;
 - The job steps involved in doing the work;
 - The controls that will be put in place to eliminate or minimise the potential hazards identified;
 - The name of the person/s responsible for ensuring that the control/s is in place.
- c) Safe Work Methods Statements shall be developed for all high or medium risk activities identified using the Risk Assessment Matrix above. Refer to sample Safe Work Methods Statement Appendix;
- d) Staff shall be trained in the applicable Safe Work Methods Statement. Records of training shall be kept for 5 years after the person ceases employment with BTS.

18.5 PERSONAL PROTECTIVE EQUIPMENT

- a) Personal Protective Equipment (PPE) can include company issued clothing, steel capped safety boots, high visibility clothing/vests, safety glasses, hard hats and hearing protection;
- b) All PPE shall be maintained in accordance with the appropriate Australian Standard, and replaced on an as needs basis;
- c) A record of PPE issued to staff shall be recorded on the PPE Issue Register – Refer Appendix.

19 INSURANCES & VEHICLE REGISTRATION

- a) BTS shall ensure that the following insurances are maintained:
 - Vehicle Insurance
 - Public Liability
 - Sickness & Accident Insurance
 - Workers Compensation or Income Protection
- b) All vehicles (prime mover and trailers) shall be registered in accordance with the relevant legislation.

20 INCIDENTS AND ACCIDENTS

- a) All incidents and accidents shall be reported to the Managing Director;
- b) The Managing Director shall complete an Incident Report. - Refer Appendix;
- c) All incidents and accidents must be investigated and the appropriate corrective and preventive action recorded;
- d) Where required by regulations, incidents shall be reported by the Managing Director to the appropriate authorities, including NSW WorkCover;
- e) All injuries will be reported to the Managing Director. Injuries will be recorded in the Injury Register. Refer Appendix.

21 DISCIPLINARY ACTION

21.1 SERIOUS MISCONDUCT

- a) Committing any of the following acts shall constitute a justifiable reason for dismissal by the BTS Managing Director:
- Conduct endangering life, safety or health of others, or failure to observe safe working;
 - Reporting to work under the influence of intoxicating liquor or non – prescription drugs;
 - Alcohol or drug taking at work, including driving under the influence;
 - Harassment, victimisation and bullying of other persons in the workplace;
 - Failure to observe mandatory environmental work practices, including deliberately washing out trucks off-site in public, and away from agreed locations;
 - Falsifying personal or company records, including counterfeiting any company form or forging a signature thereon;
 - Tampering with equipment including engine monitoring devices or speed limiting equipment;
 - Refusal to follow the reasonable instructions of company officers or supervisors, or refusal to accept assigned work;
 - The carrying of unauthorised passengers in the workplace;
 - Stealing company or customer property;
 - Physical assault of another person in the workplace, or during work time.

21.2 INVESTIGATION

- a) All events of serious misconduct or alleged serious misconduct shall be investigated in accordance with the following:
- Upon observation or notification of an allegation of serious misconduct, the employee or sub-contractor will be suspended, pending investigation of the incident. The Managing Director will be advised of the suspension and pending investigation;
 - An appropriate investigator, or Disciplinary Committee will be appointed. A thorough investigation of the circumstances surrounding the conduct of the employee/sub-contractor will be undertaken immediately, or as soon as practicable. The investigation will require taking signed and dated statements from witnesses;
 - The employee or sub-contractor will be advised of the investigation results and given the opportunity to reply to any allegations;
 - BTS will make a decision based on the results of the investigation and the employee/sub-contractor's response;
 - Where misconduct is proven, a decision on the degree of disciplinary action will be made. Where serious misconduct is proven, termination of employment should be anticipated. Suspension will be lifted if there is no proof of misconduct.

22 INTERNAL REVIEWS/AUDITS

- a) BTS shall review/audit its compliance with this manual at least twice per year using the Audit Checklist. - Refer Appendix;
- b) Any issues arising from the audit shall be rectified and evidence of their rectification recorded on the Audit Checklist.

23 RECORDS

- a) BTS will keep copies of all records for at least 5 years. Or in the case of personnel records, until 5 years after the employee ceases employment with the company;
- b) Records shall be made available to BTS clients when requested.

APPENDICES

APPENDIX 1	FORMS:	PAGE
	Tool Box Record	
	Driver Register, Medical & Licence Matrix	
	Driver Training/Competency Record	
	Fatigue Risk Assessment	
	Fatigue Safe Work Method	
	Time Sheet	
	Journey Plan	
	Pre-Start Inspection Checklist	
	Mechanical Repairs Request sheet	
	Risk Assessment form	
	Safe Work Method Statement	
	PPE Issue Register	
	Incident Report form	
	Injury Register	
	Audit Checklist	
	Site Specific Environmental Analysis (Risk Identification and Control)	
	Risk Monitoring Record	
	Landscaping & Construction Materials	
	Identification of Environmental Aspects for Projects	
	Environmental Inspection Checklist	
	Site Safety / Environmental Checklist	
	Incident Report	
 APPENDIX 2	 MANAGEMENT PLANS & SYSTEMS TABLES OF CONTENTS:	
	Occupational, Health, Safety and Rehabilitation	
	Environmental	
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 APPENDIX 3	 INSURANCES:	
	Public Liability	
	Workers Compensation	