**Gastech Australia Pty Ltd**

**HSE Management System Overview**

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| **Rev Number** | **Summary of Revision** | **Signed (Director)** | **Date** |
| **Rev 0** | **Overview** |  |  |
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**Procedure 4.1**

***Committed to HSE”***

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# 1. PURPOSE

Gastech HSE System is compliant with the requirements of AS/NZS 4801-2001

This Health Safety and Environment Management (HSE) Overview has been developed to give direction on how Gastech will achieve its HSE policy objectives and those of its clients.

The objective of this HSE Overview is to ensure that incidents are avoided through identification of hazards, risk assessment and control of risk to a level which is as low as reasonably practicable.

This Overview details strategies which are used to effectively implement and improve the overall HSE Management System and maintain the required HSE culture throughout the organisation, so effective implementation and continual improvement in HSE management can be achieved.

# 2. SCOPE

The scope of this Overview applies to all Gastech employees and is applicable whilst working at Gastech premises, and at client premises and operations, unless directed by the client to follow their HSE Management System requirements. Generally, this Overview addresses:

* Management commitment to HSE and management review of performance
* Establishment of annual objectives, targets and key performance indicators for the Gastech organisation and employees
* Processes for identification of hazards and assessment of risk associated with Gastech activities and for mitigation of risk to a level which is as low as reasonable practicable
* Competency requirements for employees
* Support processes for effective implementation, audit and continual improvement of the Gastech HSE Management System
* Maintenance of records to enable data to be analysed and to ensure transparency for audit purposes
* The process of inspections and audits to ensure that compliance with HSE requirements is achieved and the HSE Management System continually improved

Further detail is provided in OHSE Management System Documentation which is referenced throughout this Plan. Compliance with the system is reviewed on a regular basis through audits and inspections. Required improvements in the system are made as required as a result of:

* Audits and inspections
* Changes in legislative requirements
* Lessons learned from internal and external sources

This Overview and HSE System Procedures are reviewed annually or when changes are required.

**HSE Policy**

The Aim of Gastech is to achieve the highest attainable level of occupational safety health and environment working conditions for its employees, contractors, visitors and other persons throughout all areas of its activities. At Gastech, all people have a responsibility for implementing this Policy by striving to achieve zero tolerance towards hazards, incidents and accidents.

In order to achieve this, Gastech shall:

* demonstrate leadership and commitment through all its managers and supervisors
* provide and maintain a safe work environment, including work conditions, practices and procedures for all employees and persons who come into contact with Gastech workshops and office facilities
* develop awareness throughout by initial and ongoing education, training and supervision of -Gastech staff
* take all practicable steps to eliminate hazards within the workplace through hazard identification, risk assessment and control and monitoring to ensure continuing effectiveness
* comply with all applicable safety, health and environment statutory requirements as a minimum at Gastech facilities and those of the client
* establish measurable objectives and targets to ensure continued improvement aimed at elimination of work related injury and illness
* involve all Gastech staff in occupational safety, health and environment management through consultation and by contributing to identifying hazards and assessing and controlling risks as well as reviewing safety, health and environment performance
* ensure that all incidents are reported, recorded and root causes identified, and where injury or illness occurs, help our people to achieve full recovery through prompt treatment and injury management
* allocate appropriate resources to meet the commitments of this Policy

Employees also have a duty to take care for their own health and safety and of others affected by their actions at work. In order to achieve this, each individual employee must:

* not wilfully interfere with or misuse items or facilities provided in the interests of safety and health of Gastech employees
* report hazards and accidents in accordance with agreed Gastech Procedures This signed statement of Policy will be displayed at all relevant work locations.
* *Signed: Date:*

# 3. ORGANISATIONAL STRUCTURE

# 4. RESPONSIBILITIES

## 4.1 Directors

The Directors of Gastech ensure processes are established and resources provided for managing HSE through the Gastech HSE Management System

* demonstrate visible leadership and commitment to HSE and the environment and the goal of zero incidents
* monitor compliance with HSE requirements and make improvements as required to reduce risk and achieve continual improvement in HSE Management
* review audit reports provided by internal and external sources and take appropriate actions as required to address non-compliances and to maintain continual improvement in the HSE management system

## 4.2 Managers

The Managers at Gastech must:

* lead by example and ensure that sound HSE work practices and procedures are followed and exposure to hazards avoided
* ensure that all personal protective equipment is available and used properly
* communicate and consult about workplace hazards that may affect their health and safety or threaten the environment
* provide HSE reports to the Director as required
* monitor implementation of Gastech procedures
* provide HSE support and advice to employees and contractors as required
* organise HSE training for employees and contractors as required
* participate as required in client HSE activities
* ensure that necessary steps are promptly taken to prevent incidents
* ensure that work environments are maintained in a safe, healthy and environmentally responsible manner
* ensure compliance with client HSE requirements when on site
* ensure all hazards are identified, assessed and appropriate controls implemented on all projects

## 4.3 Supervisors

The Supervisors at Gastech must:

* ensure Gastech procedures are implemented properly
* participate as required in client HSE activities
* demonstrate and communicate HSE behaviour on an ongoing basis
* ensure that all HSE incidents are reported
* ensure that necessary steps are promptly taken to prevent incidents
* ensure that work environments are maintained in a safe, healthy and environmentally responsible manner
* ensure compliance with client HSE requirements when on site
* ensure all hazards are identified, assessed and appropriate controls implemented on all projects
* provide HSE support and advice to employees as required
* lead by example and ensure that sound HSE work practices and procedures are followed and exposure to hazards avoided
* ensure that all personal protective equipment is available and used properly
* communicate and consult about workplace hazards that may affect their health and safety or threaten the environment

## 4.4 Employees

All employees :

* ensure that sound HSE work practices and procedures are followed and exposure to hazards is avoided
* ensure all personal protective equipment is used properly
* ensure all hazards are identified, assessed and appropriate controls implemented on all projects
* communicate and consult about workplace hazards that may affect their health and safety or threaten the environment
* attend HSE Meetings at Gastech or on client sites as required
* attend HSE training as required by Gastech or client
* participate as required in client HSE activities
* demonstrate and communicate HSE behaviour on an ongoing basis
* ensure that all HSE incidents are reported
* ensure that necessary steps are promptly taken to prevent incidents
* ensure that work environments are maintained in a safe, healthy and environmentally responsible manner
* ensure compliance with client HSE requirements when on site

# 5. OBJECTIVES AND TARGETS

Gastech must continually develop and conduct a process to prioritise its HSE issues. As a minimum, the prioritisation process must include the following information:

* Commitments and values of Gastech HSE Policy
* Legal and other requirements identified through legal and other assessments
* Financial, operational and business requirements of the organisation
* Potential concerns of management staff and customers
* Objectives and annual targets established by Gastech Management

Organisation HSE objectives must be established for all HSE issues determined to be priorities through the prioritisation process described above.

* Targets, roles, responsibilities and descriptions for carrying out HSE objectives shall be documented and incorporated into Gastech Management Objectives annually
* Time frames shall be assigned for all HSE objectives and targets
* HSE objectives and targets must be approved by Gastech Management
* Performance toward achieving and continued appropriateness of HSE objectives and targets must be reviewed and updated by Management and delegated staff

As part of the normal performance review the company will:

* undertake full reviews on any regulatory or operational change that has the potential to introduce new requirements, hazards or risks to the organisation
* communicate objectives and targets to all those responsible for achieving the objectives including employees, contractors and organisation management
* Document all objectives and targets. As a minimum, the documentation shall include:
* results of the Gastech prioritisation process
* names and titles of the personnel that developed the objectives and targets

record(s) of the identified objectives and targets and the period over which they apply

# 6. COMMUNICATION & CONSULTATION

## 6.1 Meetings

Gastech is committed to maintaining a strong communicative and consultative culture.

Whilst on site, Gastech employees and contractors will hold weekly toolbox meetings to provide an open forum for discussions on:

* close out of HSE action items arising from previous meetings
* upcoming work activities, hazards and controls
* changes in HSE legislation/Codes of Practice etc
* any relevant HSE Alerts
* HSE issues on site
* changes to workflow
* review of Job Hazard Analysis and Permits to Work

Daily pre-start meetings will be held on site and will include:

* upcoming work activities, hazards and controls (on-the-job and the surrounding work environment)
* any high risk work expected to be undertaken and relevant key controls
* review of Job Hazard Analysis and Permits to Work

Meetings will be held monthly by a Gastech Director and will include areas such as:

* considering and making recommendations on HSE Policy issues
* considering and making recommendations on all issues which are unable to be resolved at HSE Toolbox Meetings
* keeping itself informed on new HSE standards and legislation applicable to Gastech, taking action to comply with new, applicable regulations
* regularly reviewing HSE performance reports and actions for improvements in HSE management and, where necessary, making decisions and approving funding to correct issues and ensuring continual improvement in HSE management

## 6.2 HSE Issue Resolution

Where any Gastech personnel encounters what they believe to be a hazard or are involved in work which they consider unsafe, they must immediately report their concerns to the Supervisor who will in turn follow the Issue Resolution process. Issues must be resolved as soon as possible.

## 6.3 HSE Alerts

HSE Alerts are used to ensure a good level of communication is available and maintained between Gastech employees, and clients on any HSE matters concerning each party.

## 6.4 Notice Boards

Notice boards are used to communicate all key HSE information to all Gastech employees and minutes of meeting and external safety alerts.

# 7. HAZARD MANAGEMENT

Effective hazard identification is an important first step in any risk management process. Hazards must be identified for all work carried out and the degree of risk associated with each hazard assessed for acceptability using the Risk Matrix.

Hazard identification tools at include:

* Audits - carried out by the Director and an external specialist to confirm compliance with the HSE System and identify areas for improvement
* Inspections - carried out Supervisory personnel
* HAZID Reviews - conducted before commencement or supply of equipment and parts if deemed a requirement.

Job Hazard Analysis - carried out by supervisory before commencement of specific tasks

Other Risk Assessment processes must be utilised as necessary, including Safe Work Procedures, Hazard and Operability Studies (HAZOP), Failure Mode Effects and Critical Analysis

## 7.1 HAZID Reviews

HAZID Reviews are used to identify hazards associated with projects before commencement, or for review of risk associated with equipment and spares to be provided to clients. A suitably competent person must develop a project/Job specific Hazard and Risk Register for each project using the Hazard Identification Checklist tool.

## 

## 7.2 Job Hazard Analysis (JHA)

A Job Hazard Analysis will be undertaken by competent personnel before the commencement of high risk or hazardous activities or when conditions on or around the job change.

JHAs include:

* a description of the equipment used in the work activity
* any qualifications and/or training required to enable people to do the work safely
* a listing of the legislation and relevant Codes of Practice that apply to the workplace
* the job steps involved in the activity
* the identified hazards arising from the job steps
* the risk related to the identified hazards
* the level of risk before risk treatment (Inherent Risk)
* the safety measures to be implemented to reduce the risk to ALARP
* the level of risk after risk treatment (Residual Risk)
* a listing of ‘persons responsible’ set against the control measures

Take 5 is a process utilised by Gastech for smaller, less hazardous tasks where a full Job Hazard Analysis is not required.

The process for Take 5 is to:

* Stop and think
* Observe the work area and surrounds
* Think through the task before you start
* Check what else is happening in the area
* Identify what could go wrong
* Eliminate or control the hazard

## 7.3 Safe Work Procedures

Safe Work Procedures are developed at Gastech to provide step-by-step mandatory requirements for routine work. The process for developing Safe Work Procedures requires:

* discussion on tasks, taking into account data available and previous lessons learned
* identification of key steps in the task from start to finish
* identification of hazards associated with each step and risk associated with each step
* documentation of hazard control measures into each work step to ensure the task can be conducted safely and in an environmentally acceptable manner

Discussions and decisions are then documented in a standard format.

A consolidated listing of tasks which require Safe Work Procedures must first be developed.

The listing must be developed by a team of people with relevant expertise. The size and composition of the Teams will be dependent on the nature and complexity of the task for which the Procedure is being developed.

Safe Work Procedures must be developed on the basis of:

* Knowledge of requirements
* Observations
* Job Hazard Analysis (JHA) or other risk assessment techniques

There is a close link between development of JHA and the requirement to formalise JHAs into Safe Work Procedures. Specific criteria for this are provided in the  *Procedure for Job Safety Analysis and Take 5*. Where Safe Work Procedures are developed based on a documented JHA, the development team must ensure that additional technical and hazard control information is included as required, as Safe Work Procedures are generally required to be more thorough and formal in nature.

# 8. INSPECTIONS & AUDITS

Formal Audits and Inspections will be undertaken on a regular basis to assist in identification of deficiencies and hazards at head office, the workshop and on site as well as Gastech systems and processes.The Inspections and Audits schedule can be seen below:

|  |  |  |  |
| --- | --- | --- | --- |
| **Formal Inspections** | **Frequency** | **Responsibility** | **Submit completed forms to:** |
| **Office** | Monthly | Office Administrator | Director |
| **Workshop** | Monthly | Supervisor | Director |
| **Hazard Reporting** | Ongoing | All | Supervisor/Directors |
| **HSE Systems Audit** | yearly | External | Director |

In addition to the processes listed above, Hazard Report Cards must also be used by any employee, on a day-to-day basis to record any observed hazards that are encountered in the workplace.

All actions arising from completed Audits, Inspections and Hazard Identification and reports must be entered into the Gastech HSE Action Register to enable close out of action items to be tracked and verified.

# 9. HSE TRAINING

A Training Matrix has been developed for Gastech which identifies and summarises training needs.

A Consolidated Training and Competency Register shall be maintained at Gastech and must include a record of competencies and certification requirements for all employees and contractors to undertake specific tasks and operated specific equipment.

Inductions must be undertaken by all employees working for or on behalf of Gastech and must address the following areas:

* Location of facilities
* Gastech HSE Policies and HSE Management System
* Duty of Care and Legislation
* Office safety (as relevant)
* Key hazards and controls
* Hazardous substance/MSDS requirements
* Standard and specialised PPE requirements
* Incident and hazard reporting
* JSA review (as relevant)
* Verification of qualifications/competencies
* Dispute resolution
* Emergency Procedures, evacuation and first aid

Gastech employees must also attend client inductions as stipulated by the client.

Other training which may be identified as being required outside of inductions, such as Job Safety Analysis, Safety Leadership or Safe Work at Height must be scheduled accordingly, taking into consideration that specific training may need to be undertaken before particular work can commence.

Gastech also encourages requests for HSE training over and above the programmed training provided.

# 10. INCIDENT & INJURY MANAGEMENT

Gastech employees must ensure that incidents are reported and investigated in a timely manner, and to ensure that unsafe acts, unsafe conditions, root causes and required risk mitigation measures are identified.

Procedural processes must be followed for initial response, incident classifications, internal and external incident notification and incident investigation.

Root Cause Analysis is a key aspect of Incident and Injury Management and is required to determine root causes and contributing factors related to moderate and serious incidents. The results of Root Cause Analysis must be communicated to the Gastech workforces, and entered into the HSE Database to assist in prevention of recurrence.

# 11. FITNESS FOR WORK

General strategies to ensure that all Gastech employees are fit for work and capable of working in a safe manner include:

* Long term Gastech employees must attend a pre-employment medical and be assessed as fit for work before they commence work for Gastech

* Drug and alcohol testing for all employees before commencement of employment and before engagement
* Random drug and alcohol testing during the course of employment or engagement
* Compliance with client fitness for work requirements

Fatigue Management is also a key objective at and a number of measures have been established to ensure fatigue is not a contributing factor to incidents.

The following guide applies to management of fatigue at Gastech:

* Working hours should not exceed 14hrs in any 24hr period
* More than 10 consecutive hours rest is required in any 24hr period inclusive of driving time, meal breaks and leisure time
* Onshore personnel should work no more than 13 consecutive shifts before a 24hr break

# 12. EMERGENCY RESPONSE

Gastech is committed to effective response to emergency events at its own and client premises. The overall process for emergency response is provided below:



Any Gastech employee can make notification of an emergency. All emergencies must first be immediately communicated to all employees and contractors who may be at risk from the emergency. This must be done before any attempt is made to control an emergency.

Emergency Response roles and contact details are listed below:

|  |  |  |  |
| --- | --- | --- | --- |
| **ER Role** | **Title** | **PhopneName** | **Phone** |
| Emergency Coordinator 1 | Director |  |  |
| Emergency Coordinator (if 1 is not available) | Director |  |  |
|  |  |  |  |
| Communication Controller/Muster Area Marshal | Warehouse/Workshop Supervisor |  |  |

Potential emergency events at Gastech have been identified as fire, or personnel injury or fatality. Emergency Response for each event is addressed in the relevant procedure.

Employees and contractors at Gastech receive training in:

* basic fire prevention and fire response techniques
* senior and basic First Aid (selected employees only)

At least one emergency exercise per year must be conducted to ensure continual improvement in overall response.

A review of the effectiveness of emergency response at Gastech is carried out as soon as practicable following any emergency event or exercise. The ‘Debrief Group’ have the responsibility to discuss the adequacy of overall response and to implement changes to the EP and associated activities where required.

# 13. HSE COMPLIANCE REGISTER

There are a number of legal HSE obligations which relate to Gastech activities. HSE obligations related to Gastech activities must be recorded on a HSE Compliance Register. These key obligations must be known, communicated and recorded in user-friendly format so that measures can be taken by Gastech to ensure that obligations are met.

The Register must be revised, as required, to reflect jurisdiction specific and project specific requirements. The following examples are provided for guidance:

* HSE Acts
* HSE Regulations
* Approved and applicable Standards and Codes of Practice related to HSE
* Relevant contractual obligations – HSE related clauses
* Joint venture agreements – HSE related clauses
* Nationally and internationally recognised conventions etc

The above includes obligations administered by the commonwealth, states and country specific jurisdictions.

Gastech also maintains access to external document data bases such as SIA Global.

Gastech also subscribes to various other organisations which provide tracking and update notification services for changes in HSE obligations as they occur. When changes in obligations do occur, old versions and obligations must be removed from the system.

# 14. EQUIPMENT EVALUATION

All equipment supplied to clients by Gastech must not be supplied until it is confirmed that equipment can be operated in a safe manner in the environment it is required to operate.

The overall process to confirm this requires equipment specifications and related risk study results undertaken by the supplier to be provided so that they can be assessed against the conditions in which equipment is required to operate. Where changes to equipment or equipment components are changed these changes must also be notified and assessed to confirm there has been no change in risk profile. The process for HSE evaluation of equipment can be seen below:Specifications for equipment must be provided by suppliers and additional information may be required by Gastech or the client to confirm the equipment is suitable for the environment it is required to work under.It is the responsibility of the client to provide sufficient and accurate information to Gastech, and for Gastech and the supplier to provide equipment which is suitable.

# 15. MANAGEMENT OF CHANGE

Any individual or group that has the capacity to implement a change at Gastech must ensure that it is not carried out before review and approval in full compliance with the relevant Procedure.

All changes which have the potential to increase risk must be captured and assessed for risk before they are made. Where applicable, changes must be made in full consultation and with the involvement and approval of Gastech clients.

A preliminary review is conducted of any suggested change to assess and confirm the feasibility of, and justification for the change. A formal review and approval may be deemed necessary in which changes can be rejected, approved, or approved with modifications. When fully approved, implementation of the change must be properly managed by verifying that each mitigation action has achieved its intended objective.

# 

# 16. CONTINUAL IMPROVEMENT

There are a variety of processes used at Gastech to collect information and data related to HSE performance. HSE data can arise from such things as incident reports and HSE inspection reports.

Data from these processes must be collated and reviewed, and reports developed, so that areas worthy of note and areas where improvements are required are known and reported to senior personnel and the workforce.

Provision of regular reporting also ensures that senior personnel are able to track overall HSE performance and gives assurance that HSE performance is being assessed and properly managed.

HSE data and trend reporting must be carried out at Gastech on a monthly and quarterly basis.

Monthly HSE Reports provide a basic review of key areas inclusive of:

* Incidents for the month and classifications
* Number of HSE inspections performed and by who (against KPIs)
* No of Hazard Reports
* Number of Tool Box Meetings held
* Number of inspections undertaken
* Number of JHA reviewed