

# Workplace Health & Safety Manual



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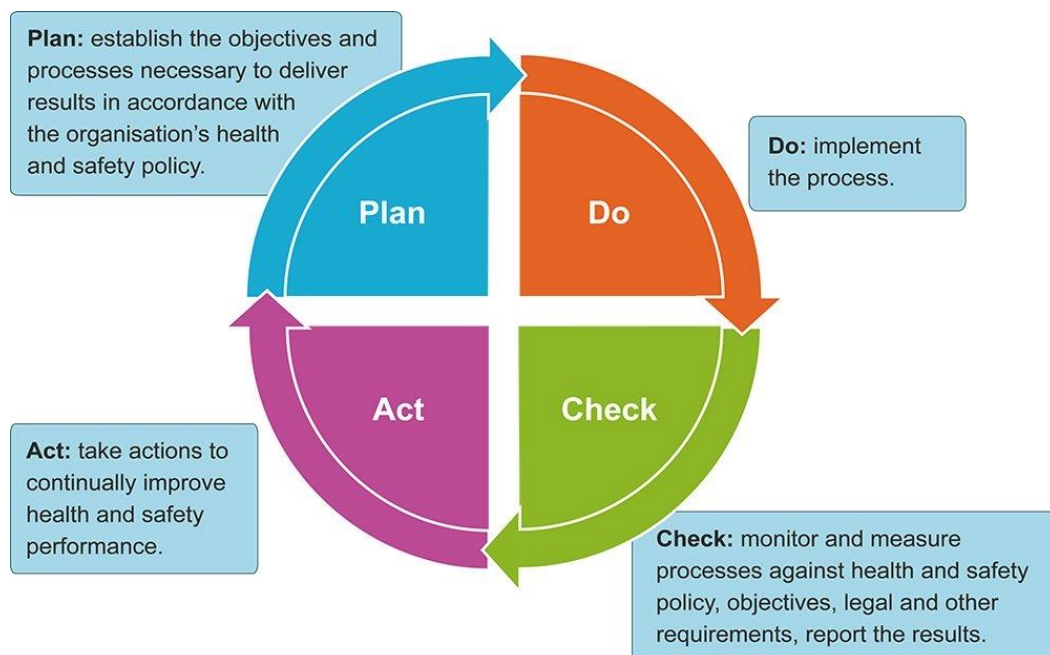
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Authorisation			
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## 1. Purpose of the WHS Manual

The purpose of the DeMartini Fletcher Property (DMF) Workplace Health & Safety (WHS) Manual is to provide the business with a clear process for the management and delivery of a safe workplace, without exposing workers to an unacceptable level of risk. The Manual shall also provide interested stakeholders (internal and external) with a background and insight into the business's ability to achieve these intended outcomes.

This manual clearly articulates the Plan, Do, Check & Act (PDCA) approach used by DMF to manage a range of concerns that could impact on the organisation's objectives.



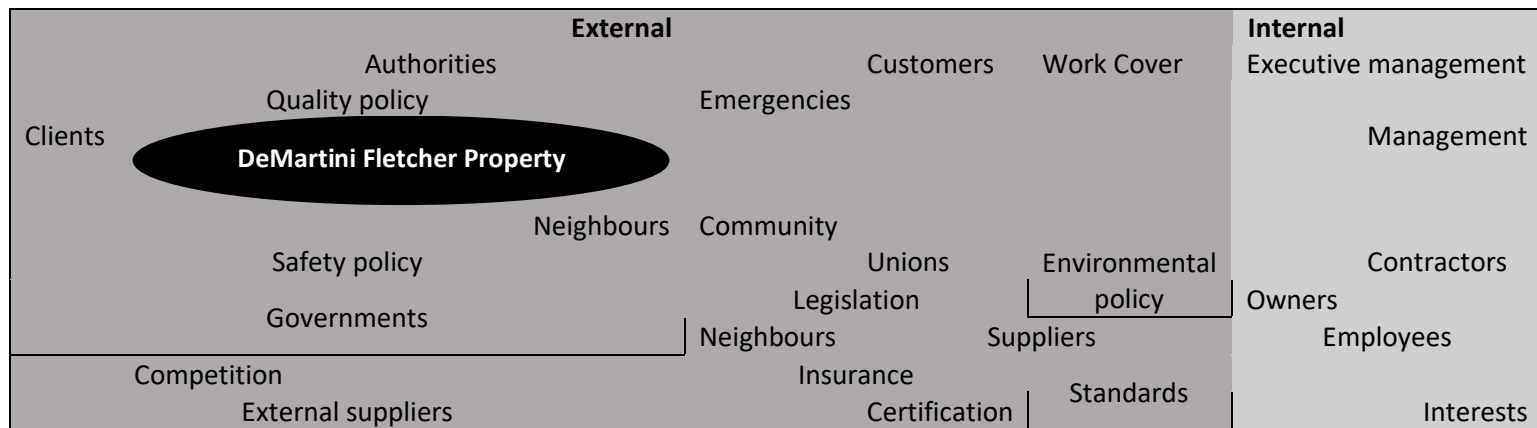
These concerns could include:

- Internal and external issues
- Needs and expectations of interested parties
- Legislative changes
- Other issues effecting intended outcomes

Applying the PDCA model, can then assist the business in meeting the requirements of WHS legislation as well as broader business objectives. DMF will continue to monitor and review the changing needs and expectations of all interested parties. This manual is available to interested parties and others upon request.

## 2. Scope of the WHS Manual

In determining the scope of the Manual, several internal and external topics and boundaries are considered. This identification of topic and boundaries helps the business in identifying a scope. These can be displayed in the illustration below.



Prior to engaging in any tender process, DMF considers the above topics during the planning and pre-planning stages. The relevant Site and Development Managers will determine the extent of control or influence the topic has on the project and wider business.

## 3. Organisational Overview

DMF is a design-led and community focussed development group that specialises in key commercial markets across Queensland, delivering exceptional results and experiences for clients and investors. The business operates with 2 primary extensions:

### **DeMartini Fletcher Property**

The property extension operates out of Level 10, 46 Edward Street Brisbane and is the base of all operations. The main functions include property management, acquisition, and leasing. The secondary function is to project manage property refurbs, maintenance and fit-outs.

DeMartini Fletcher Property does outsource some building works for developments, however, only engages contractors that align with our values, systems and qualify via the onboarding process. All outputs of the operation are subject to the risk mitigation strategy outlined in this Manual.

### **DMF Construct**

The construction extension is responsible undertaking all construction, maintenance, and fit-out activities. Whenever DMF is assigned as a Principal Contractor, DMF Construct is appointed and responsible for maintaining the site **until handover/ the date of Practical completion.**

## 4. Work, Health & Safety Policy

**DeMartini Fletcher Property** are committed to maintaining safe and healthy workplaces and ensuring the wellbeing of workers and others affected by our work is given priority status across all our projects and operations at all times.

We see health and safety as everyone's responsibility and will endeavour to maintain a positive safety culture with transparent and open system of communication between our clients, company staff, contractors and their workers to ensure that risks and hazards at our workplaces are managed effectively in a conscious effort to achieve zero or minimal harm to people and the environment.

We believe that health and safety should be considered across the entire life cycle of our projects from design and planning, through to occupancy and ongoing use. For this reason, we always strive to engage closely with our clients and stakeholders over health and safety matters and to monitor our performance through regular interviews, client feedback, effective risk management, audits and inspections.

The objectives of our safety policy are:

- To achieve an accident-free workplace
- To make health and safety an integral part of every managerial and supervisory decision
- To ensure health and safety is considered in all planning and work activities
- To involve our workers in the decision-making process through regular communication, consultation, and training
- To provide a continuous programme of education and learning to ensure that our workers work in the safest possible manner
- To identify and control all possible hazards in the workplace through hazard identification and risk analysis
- To ensure all potential accidents/incidents are controlled and prevented
- To provide effective injury management and rehabilitation for all employees

Our focus is on continuous improvement, and our policy is to elicit the same level of commitment from our clients and contractors to health and safety values and zero harm. We take pride in having health and safety as one of our core values and will not compromise the welfare of others in the delivery of our products and services.

Managing Director	Signature	Date
John De Martini		

## 5. Environmental Policy

**DeMartini Fletcher Property** is committed to continual improvement of our environmental management system and ensuring our operations are conducted in a manner that prevents pollution, preserves natural resources and conserves all heritages. We are focused on pursuing our corporate responsibility to minimise impact to land, water, air, flora and fauna. To achieve our environmental corporate responsibilities, we are committed to ensuring our operations:

- Comply with environmental legislative, contractual and regulatory requirements
- Maintain a management system and integrate environmental considerations into business and decision-making processes
- Investigate, report and respond to all environmental incidents and implement corrective actions to prevent recurrence
- Demonstrate appropriate leadership in our field of construction and encourage clients to make informed decisions with respect to projects that include a green building focus
- Reinforce to employees and contractors their environmental obligations through our programs of induction, education and training
- Cause managers and supervisors to be responsible and accountable for the environmental performance of their operations and activities
- Document, regularly review and assess processes, procedures, objectives, targets and the environmental impacts of our operations
- Communicate our policy to employees, contractors and other stakeholders including the public

We are committed to responding to the daily environmental challenges that we encounter in our business and hope to contribute to the foundation of an environmentally sustainable future for our community and future generations.

Managing Director	Signature	Date
John De Martini		

## 6. Organisational Roles & Responsibilities

The Managing Director shall ensure that the responsibilities and authorities for relevant roles are assigned, communicated, and understood at all levels and are maintained as documented information. Workers at each level shall assume responsibility for those aspects of the Manual over which they have control.

For all Principal Contracting projects, the Site Manager will be in control of the site under the guidance of the DMF Construct site specific Workplace Health & Safety Management Plan (WHSMP). It is the Site Managers responsibility to ensure that all workers, visitors and contractors conform to the requirements of the WHSMP.

For all property servicing, maintenance and management, the **Facilities Manager** will oversee all requirements. This includes property handovers, subcontractor onboarding & work provisions, leasing agreements, finances and audits / inspections.

## 7. Leadership & Commitment

The **WHS Committee** of DMF takes full responsibility for the effectiveness of the Manual and its integration into all facets of the business. This intention is clearly communicated through various policy statements, procedural documents, processes, and behaviours.

This commitment helps ensure for the prevention of work-related injury and ill health, the provision of safe and healthy workplaces and activities, protection of the environment, maintaining customer satisfaction and the effectiveness of the Manual.

Supporting this accountability and commitment are a range of processes and behaviours actively demonstrated by Management, including:

- Communicating intentions of the Manual and key documents such as the WHS policies
- Participate in reviewing the Manual annually to validate it is relevant and continually improving
- Promoting the use of the process approach and risk-based thinking through mechanisms such as internal training programs, toolbox talks, staff meetings, reviews and strategic planning
- Ensure that proper physical and financial resources are made available to continuously implement, manage, and improve the Manual
- Supporting other relevant management roles to demonstrate their leadership as it applies to their area of responsibility

DMF will remain focused on customer satisfaction, achieved through open communications with clients during the planning and delivery of projects – especially requests and deadlines.

## 8. Planning

DMF will undertake planning of all operations in a manner that:

- Ensures compliance with all applicable legislation, codes, standards, and expectations
- Maps out goals, objectives, targets, implementation, and review processes
- Ensures goals are SMART (i.e., Specific, Measurable, Attainable, Relevant & Timely)
- Meet the needs of customers and other interested parties

### 8.1. Risk Management

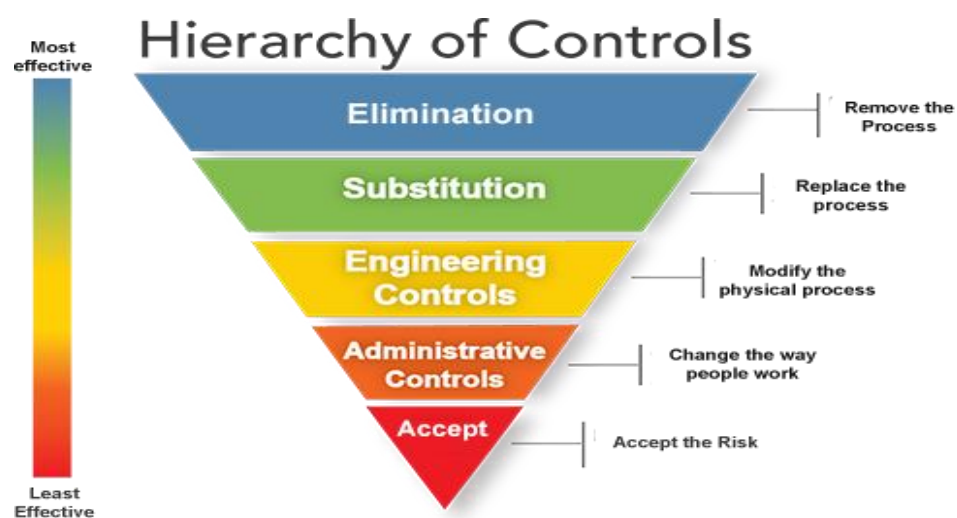
DMF adopts a risk management procedure which pro-actively identifies anything that could harm the business. Risk management is a key component of the Manual and involved two fundamental safety activities:

1. Identifying hazards
2. Assessing risks and mitigating their potential for harm

The risk management procedure is embedded into the Manual and general day-to-day business activities. This procedure outlines the identification of hazards, risk assessment processes and control options.

**WHS Committee** is required to ensure that key risk requirements and tools are routinely used across all facets of the business:

- WHSMP / Construction Management Plan (CMP) / Environmental Management Plan (EMP)
- Tools such as hierarchy of control and risk matrix (see below)
- Staff training
- Reporting mechanisms
- Communication forums such as staff meetings, toolbox talks, reviews
- Safety promotion throughout the organization to continually improve safety culture



All project specific risk management requirements are stipulated within the WHSMP.



## **8.2. Compliance**

Compliance with relevant legislation, standards and codes remains an on-going priority and objective of DMF. Key elements of the compliance strategy include:

- Identification of relevant legislation that applies to operational and non-operational facets of the business
- Understanding of the legislation and how this practically applies to the business
- An auditing schedule of all Principal Contracting projects
- Reporting of non-compliances and their immediate rectification
- Consultation mechanisms to review and promote compliance issues

## **8.3. Environment**

An important value of DMF is the on-going care of the environment. We must ensure that any business activities do not adversely affect the environment or surrounding parties. To mitigate any adverse environmental impact from our construction projects, a site specific EMP is implemented.

## **8.4. Project Risk**

For tendered projects, the following planning considerations are required for the applicable Development / Site Managers:

- Outlining the objectives of the project
- Development of project plans for the works and associated documentation (this includes scope of works, construction programmer, resources, equipment and budget considerations)
- Changes to project design
- Approval and implementation processes to ensure all projects and services meet the intended outcomes
- Review and assess the capability of contractors, clients and other interested parties
- Identifying specific legislation / codes / obligations that must be complied with

All site specific risks for the project are outlined within the WHSMP.

## **8.5. Support**

DMF will maintain sufficient resources to implement, maintain and continually improve operations via the Manual. Resources are maintained at both Management and operational levels and will also be supplemented by external consultants as required.

### 8.6. PPE

DMF staff will adhere to any mandatory project specific PPE requirements when visiting a site. **DMF will provide PPE to staff for use as required during normal day-to-day activities.**

## 9. Communication & Consultation

Communication and consultation is a critical process throughout all operations conducted by DMF. The business maintains an open-door-policy to ensure communication and consultation is available to all staff. Some key communication topics relevant to the Manual include:

- legal and compliance requirements
- Communication forums such as meetings and toolbox talks
- contractor and contractor requirements and interests
- project plan requirements
- changes to processes / plans / projects / legislation etc.
- key elements of the IMS

The table below summarises key communication mechanisms between Managers, front line staff and other specialists.

WHS		
Alerts	SWMS	Inductions
JSA's	Notice boards	Emails
Handovers	SOP's	Safety management plans
General Business		
Emails	Office meetings	Reports
Presentations	Feedback	Inspections
Investigations	Management reviews	Committee meetings

### **DeMartini Fletcher Property**

- Monthly management meetings
- Fortnightly project progress meetings
- Other meetings as required

### **DMF Construct**

- Inductions
- Pre-start meetings
- Toolbox meetings
- Outcome of audits / inspections
- Other meetings as required

## 10. Documentation

DMF maintains separate documentation systems for each extension of the business. This is to ensure that all operations maintain compliance and have targeted risk mitigation strategies. The following list specifies the documents required:

### **Construction Projects**

- WHSMP / CMP / EMP
- Various forms, registers, and checklists
- SWMS
- Plans / drawings

### **Fit-Outs**

- Various forms, registers, and checklists
- SWMS
- Plans / drawings

### **Maintenance & Repairs**

- SOP's
- Report forms
- Checklists
- Plans / drawings

### **Property Management**

- Lease agreements
- Handover forms
- Plans / drawings

## 11. Contractor Management

DMF ensures that all contractors engaged to undertake works are vetted prior to commencement. With contractors representing DMF, it is pivotal that they are held to the required standard. All works are separated into either a general or construction category. All documentation must be submitted to DMF with sufficient time to be reviewed.

### **General Works**

These are any repair, maintenance or fit outs works that are not performed on a construction project. The contractor engaged must supply a safe system of work which could include a plan, SMWS, SOP or other methodology. They must also have any applicable registers such as electrical, SDS, licence, etc.

## Construction Works

These are any works that are undertaken on a construction project with DMF Construct as the Principal Contractor. All high-risk works, as stipulated by WHS legislation, are required to have a SWMS. All other works must be under the guidance of a SWMS, SOP or other methodology. The Site Manager will review and approve all SWMS, SOP's and methodologies prior to work commencing.

Contractors must also provide the Site Manager with any applicable registers, licenses, competencies, plans, etc. with all specifics detailed within the WHSMP.

### **11.1. Property contractor onboarding**

All contractors who undertake work on a property managed by DMF must first go through the onboarding procedure. This includes the contractor submitting the following for review and approval:

- WHS documentation (methodology such as SWMS or SOP's)
- Certificates of currency (Public Liability and other insurance)
- Applicable licences

DMF will request a Certificate of Currency to confirm public liability cover for the contractor to ensure that if the contractor causes property damage or is involved in an event resulting in litigation between the employer business and another party, or the contractor themselves.

The Certificate of Currency is a document that confirms a current policy is in place as of the date of issue and lists the details of the insurance policy. It is often required by Third parties to provide evidence that you have the appropriate cover for the asset or business.

DMF records all of this information in the *005 DMFP Contractor Register* which includes all approvals and expiry dates. Once approved, contractors will have their documentation reviewed on an annual basis which will include re-submitting the above to ensure everything is current.

To assist contractors, DMF will provide our *004 Contractor Self-Assessment Checklist* which will detail what items will be required for their onboarding submission.

Specifically for high-risk work requiring SWMS, DMF will utilise the *003 SWMS Review Checklist* to validate submitted documents. DMF will also utilise third-party WHS consultants to review documentation as required.

DMF will also require a kick-off meeting for contractors who are undertaking any specialised or inherently high risk (e.g. permit works such as roof access) to ensure the methodology is adequate.

## 12. Tenancy Leasing WHS Arrangements

Once a property has been acquired or finished construction, DMF will arrange for a leasing agreement to be developed. This will include outlining all tenant and DMF landlord responsibilities / obligations.

DMF will ensure that all properties handed over are compliant with all building standards, guidelines and codes.

To fulfill DMF's emergency management obligations, all handed over common areas will have compliant:

- Evacuation plans
- Fire hose reels
- Fire extinguishers
- Emergency exits with signage
- Emergency lighting
- Testing of evacuation alarms
- Outlets for services to be connected
- DMF emergency contact number

For tenants to fulfill their emergency management WHS obligations as a PCBU, they must have:

- Additional fire extinguishers
- First aid kits
- Emergency evacuation plans specific to their tenancy

DMF will provide all new tenants with a *Handover Information Pack* which will clearly outline the obligations listed above and all DMF expectations. The pack will also include any applicable auditing / inspection schedules.

### 13. Glossary

Term	Definition
Audit	The process of assessing a workplace and identifying any hazards that may put employees at risk. The audit can either be an informal walk around or a formal planned inspection, however in both cases, it is a documented process and demonstrates why safety is important in the workplace
CMP	Construction Management Plan
Code of Practice	The model Code of Practice Codes of practice are practical guides to achieving the standards of health, safety and welfare required under the WHS Act and the WHS Regulations in a jurisdiction. To have legal effect in a jurisdiction a model Code of Practice must be approved as a code of practice in that jurisdiction. Courts may regard an approved code of practice as evidence of what is known about a hazard, risk or control and may rely on the code in determining what is reasonably practicable in the circumstances to which the code relates.
Compliance	Complying with Workplace Health and Safety laws and regulations involves taking steps to ensure that everybody who works or enters your workplace is as safe as they possibly can be.
EMP	Environmental Management Plan

Hazard	A situation or thing that has the potential to harm a person.
Hierarchy of Control	The hierarchy of risk control shows ways of controlling risks, ranked from the highest level of protection and reliability to the lowest.
HRW	High-risk work
WHSMP	Workplace Health & Safety Management Plan
IMS	An Integrated Management System (IMS) combines all related components of a business into one system for easier management and operations of Occupational Health & Safety.
Injury Management	As a workplace-managed process incorporating the employer and medical management team, from the time of injury to facilitate an efficient maintenance in or return to suitable employment. Effective injury management provides physical, psychological and financial benefits to employees.
JSA	Job Safety Analysis
PCBU	Person conducting a business or undertaking. The model WHS Act places the primary duty of care on the PCBU. The term PCBU is an umbrella concept used to capture all types of working arrangements or structures. A PCBU can be a: company; unincorporated body or association; sole trader or self-employed person. Individuals who are in a partnership

	that is conducting a business will individually and collectively be a PCBU.
Principal Contractor	A Principal Contractor is defined under the Work Health and Safety Regulation 2011 (s293) as: A person conducting a business or undertaking that commissions building and construction work, is the principal contractor for the building and construction work.
Risk	The possibility that harm (death, injury or illness) might occur when exposed to a hazard.
Risk analysis	A comprehensive review of your workplace to identify anything that may cause harm. Hazards can include tasks, applications, tools and environmental conditions. In other words, hazards are anything that has the potential to cause harm. The risk is then the likelihood of that harm occurring
SDS	Safety Data Sheet
Stakeholder	<p>They might include:</p> <ul style="list-style-type: none"> <li>• Managers</li> <li>• Clients</li> <li>• Employees</li> <li>• OHS Committees</li> <li>• Members of the public</li> <li>• Government organisations</li> <li>• Unions</li> </ul>
SWMS	Safe Work Method Statement



WHS	Work health and safety
Worker	Any person who carries out work for a PCBU, including work as an employee, contractor, subcontractor, self-employed person, outworker, apprentice or trainee, work experience student, employee of a labour hire company placed with a 'host employer' and volunteers.
Workplace	Any place where work is carried out for a business or undertaking and includes any place where a worker goes, or is likely to be, while at work. This may include offices, factories, shops, construction sites, vehicles, ships, aircraft or other mobile structures on land or water.