Safety Management System

813 Wallgrove Road, Horsley Park

DHL Supply Chain (Australia) Pty Ltd
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DHL Supply Chain (Australia) Pty Ltd

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Abbreviations

Abbreviation	Description
ADG	Australian Dangerous Goods Code
AS	Australian Standard
CBD	Central Business District
DGs	Dangerous Goods
ERP	Emergency Response Plan
FAI	First Aid Injury
HIPAP	Hazardous Industry Planning Advisory Paper
KPI	Key Performance Indicator
LTI	Lost Time Injury
QA	Quality Assurance
RDC	Retail Distribution Centre
SMP	Safety Management Plan
SMS	Safety Management System
SMSS	Storage Mode Sprinkler System
SOP	Standard Operating Procedure
SWMS	Safe Work Method Statement
WHS	Work Health and Safety

1.0 Introduction

This document describes the Safety Management System (SMS) for the operation of the Charter Hall facility located at 813 Wallgrove Road, Horsley Park, NSW. This SMS has been developed for the purposes of managing the safety of the operations conducted by site personnel and contractors or other staff visiting the site.

1.1 Structure of the Safety Management System

The SMS has been developed to match the safety management requirements of the operations at site. This SMS has the following three main components:

1. Policy and Objectives
2. Safety Management Core System
3. Procedures

The Safety Management core system comprises the following:

- Scope
- Summary of operations, hazards and safety
- Management structure
- Accountabilities and responsibilities
- Performance standards
- Safety assurance process
- Training philosophy
- SMS documentation integrity
- SMS review and basis for continuing SMS improvement
- Relationship to safety policy, environmental policy and quality assurance (QA) policy
- Management of change and control of facility modifications
- A list of supporting procedures

1.2 Reference Documents

This Safety Management System has been developed in accordance with the Hazardous Industry Planning Advisory Paper (HIPAP) No. 9 "Safety Management", issued by The Department of Planning and Environment (Ref. [1]). This and other relevant documents are referenced throughout this SMS description and are listed in the References Section.

2.0 Policy and Objectives

A number of corporate policies that are used to set the direction of safety and environmental requirements within the organisation. These are listed throughout this document.

The site operates a number of methods for communicating policy requirements to staff and employees. A site safety committee is formed under the WHS Regulations 2017 (Ref. [2]), to communicate between management and employees. A site safety committee procedure has been developed and shall be followed to ensure communication between management and employees is maintained and policy requirements are communicated to all employees.

Policies shall also be posted on site safety noticeboards and the safety committee members shall draw attention of employees to the noticeboards as part of regular toolbox meetings.

A key factor in any organisation is how the corporate policies are implemented. The policies are implemented at the site using the Key Performance Indicator (KPI) approach. In summary, each position shall be allocated a number of KPIs, which are assessed and reported as part of the position incumbent's performance review.

Performance reviews are conducted every 12 months, at which time the KPIs are assessed against the targets. Staff and employees are then held responsible for implementing the KPIs. Application of SMS elements, meeting maintenance, operations and safety targets are all included within KPIs.

The Safety, Environmental and QA policies and objectives are described in:

- WH&S Policy
- DHL Global Environment Policy
- Fit for Work Policy (Drugs and Alcohol)

Policies shall be reviewed by management biennially (once every 2 years) or as required.

3.0 Scope and Purpose

This SMS covers the DHL facility located at 813 Wallgrove Road, Horsley Park. This SMS provides a management framework for:

- Safely undertaking potentially hazardous activities
- Minimising the likelihood of incidents
- Managing occupational health and safety
- Assisting in protecting people, property and the biophysical environment from normal operations as well as abnormal deviations

The site will store and handle a range of goods including dangerous and non-dangerous goods. In order to ensure the storage and handling activities at the site are effectively managed, it is necessary to provide appropriate controls, procedures and practices that will minimise the potential for harm as a result of hazardous incidents that may occur at the site.

In order to provide the appropriate controls, procedures and practices, the operator has used its knowledge of logistics to identify hazards and risks in the development of this SMS which will be applied globally at the site.

The SMS references or specifies all safety related procedures, responsibilities and policies along with details of mechanisms for ensuring adherence to procedures. As such, the SMS is the controlling document for all operations on-site and associated transport activities involving hazardous materials.

The policy and supporting procedures that form parts of this SMS are listed in **Section 14.0.** A list of procedures and work instructions are listed in **Section 14.1** to assist users of this document to locate the appropriate controls, procedures or practices.

1) The SMS is an integral part of the overall management system at the site and complements other management systems and the quality system controlling such aspects as goods storage and handling processes, environmental protection, marketing and finance, and human resources.

4.0 Site Description

4.1 Site Location

The site is located at 813 Wallgrove Road, Horsley Park which is approximately 43 km west of the Sydney Central Business District (CBD). **Figure 4-1** shows the regional location of the site in relation to the Sydney CBD. Provided in **Figure 4-2** is the layout of the site in Horsley Park.

Figure 4-1: Site Location

4.2 Adjacent Land Uses

The land is located in an industrial area surrounded by the following land uses, which are adjacent to the site:

- North – Undeveloped land
- South – Undeveloped land
- East – Undeveloped land
- West – Undeveloped land

4.3 Site Description

The warehouse will store a range of DGs in retail packages and the facility will be designed to comply with AS/NZS 3833:2007 (Ref. [4]). Specifically, the facility will comply with the Retail Distribution Centre (RDC) section of the standard which accounts for the reduced risk posed by packages stored in restricted small volumes.

Hours of operation will be 6 am to 10 pm, Monday to Friday with two shifts per day. The morning shift will have approximately 50-60 staff, the afternoon shift will have between 10-20 staff.

The warehouse will be protected by a bespoke automatic sprinkler system involving both ceiling mounted and in-rack sprinklers depending on commodities stored. The sprinklers which will activate upon fire detection which will suppress and control any fire that may occur. The warehouse will be naturally ventilated for occupation purposes which will provide adequate ventilation flow for preventing accumulation of any vapours released from packages in storage as required by AS/NZS 3833:2007 (Ref. [4]).

All DG products will be protected by base building specified Storage Mode Sprinkler System (SMSS) sprinklers, also known as an Early Suppression Fast Response (ESFR) sprinkler system. The flammable liquids storage area and the aerosols will be protected by Scheme-A in-rack sprinkler system designed according to AS 2118.1:2017 (Ref. [5]). All DG areas will be protected by hose reel coverage in addition to hydrant coverage.

The whole site will be capable of containing at least 90 minutes of potentially contaminated fire water as required by AS/NZS 3833:2007 (Ref. [4]) and the NSW "*Best Practice Guidelines for Contaminated Water and Retention Systems*" (Ref. [6]). The water will be contained via isolation of the stormwater system which is performed by the actuation of a penstock valve upon fire detection.

The site will be subject to a hazardous area classification per AS/NZS 60079.10.1:2022 (Ref. [6]) and any electrical equipment within the hazardous zone will be compliant per AS/NZS 60079.14:2022 (Ref. [8]) to minimise the potential for ignition of flammable vapours which may be released during storage.

4.4 Quantities of Dangerous Goods Stored and Handled

The dangerous goods stored at the warehouse are for various customers and may fluctuate with customer requirements. The classes and quantities to be approved in the facility are summarised **Table 4-1**. The proposed DG storage locations are shown in **Figure 4-2.**

Table 4-1: Maximum Classes and Quantities of Dangerous Goods Stored

Class	Description	Packing Group	Quantity (kg)
2.1	Flammable gases (aerosols)	n/a	100,000 / 25,000*
3	Flammable liquids	II & III	84,000
5.1	Oxidising agents	II & III	50,000
8	Corrosive substances	II & III	300,000
9	Miscellaneous DGs	III	100,000

*Note: This refers to the quantity of propellant within the aerosols and not the total package weight. The propellant content within the cannisters is typically around 25% of product weight.

4.5 Aggregate Quantity Ratio

Where more than one class of dangerous goods are stored and handled at the site an AQR exists. This ratio is calculated using **Equation 3-1:**

$$AQR = \frac{q_x}{Q_x} + \frac{q_y}{Q_y} + [\ldots] + \frac{q_n}{Q_n}$$ **Equation 3-1**

Where:

x,y […] and n are the dangerous goods present

q_x, q_y, […] and q_n is the total quantity of dangerous goods x, y, […] and n present.

Q_x, Q_y, […] and Q_n is the individual threshold quantity for each dangerous good of x, y, […] and n

Where the ratio AQR exceeds a value of 1, the site would be considered a Major Hazard Facility (MHF). The threshold quantity for each class is taken from Schedule 15 of the Work Health and Safety (WHS) Regulation 2017 (Ref. [2]). These are summarised in **Table 4-2** noting Class 8, is not subject to MHF legislation.

Table 4-2: Major Hazard Facility Thresholds

Class	Packing Group	Threshold (tonnes)	Storage (tonnes)
2.1	n/a	200	25.0
3	II & III	50,000	84
5.1	II & III	200	50
8	II & III	Not subject to MHF	300
9	III	Not subject to MHF	100

A review of the thresholds and the commodities and packing groups listed in **Table 4-2** indicates only Class 2.1, 3, 5.1, and 6.1 are assessable against the MHF thresholds. Therefore, substituting the storage masses into **Equation 3-1** the AQR is calculated as follows:

$$AQR = \frac{25.0}{200} + \frac{84}{50000} + \frac{50}{200} = 0.377$$

The AQR is less than 1; hence, the facility would not be classified as an MHF.

Figure 4-2: Site Layout

5.0 Organisation Structure

5.1 Management Structure

The warehouse management reports to the corporate management team which is displayed in **Figure 5-1**. The structure has been developed with accountabilities and responsibilities in mind, based on the straightforward nature of facility operations.

The final responsibility for all management functions at the site resides with the Managing Director who delegates to the Integrated Operation manager who further delegates to Site Operations Manager(s). The Site Operations Manager oversees the individual team leaders at the warehouse.

5.2 Roles and Responsibilities

The roles and responsibilities over personnel in the hierarchy are described below:

- Managing Director: Has the overall responsibility for Safety Management System.
- Directors: Have the overall responsibility to provide a safe workplace and will ensure adequate resources are provided.
- Managers: Have a responsibility in their area on control of communication, implementation, carry out inspections, ensure risks are controlled or eliminated, monitoring and training.
- Supervisors, coordinators & team leaders: Have the responsibility to communicate, implement, monitor, identify and report all risk within their area of control.
- Employees: Have a responsibility to report any incident or hazards, obey instructions relating to their health and safety whilst at work, assist in the identification of hazards and assessment of risks and provide feedback as required.
- Contractors are inducted to facilities and are governed by the Contractor Safety Management Procedure.

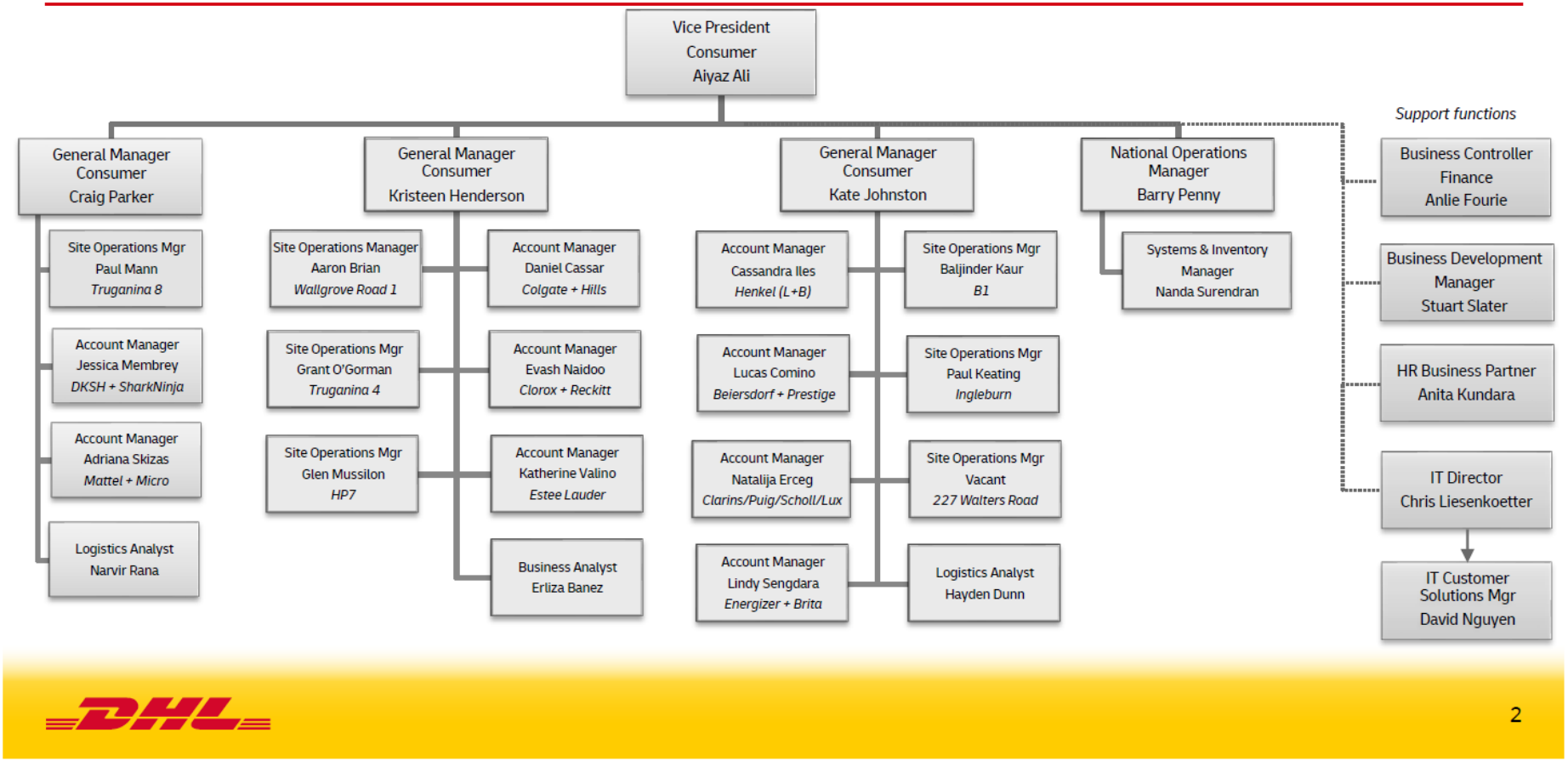

Figure 5-1: Corporate Management Structure

6.0 Accountabilities and Responsibilities

As indicated in **Section 5.0**, the Site Manager has authority to delegate certain responsibilities and has therefore allocated the responsibility for various SMS policies and procedures to the team leaders indicated in **Table 6-1**. All policies and procedures not indicated in this table are the responsibility of Site Manager.

Table 6-1: Safety Management Responsibilities

Subject	Responsibility carried by
Environmental, Health and Safety Policy	Site Management
Quality Assurance Policy	Site Management
Maintenance of the SMS	WHS Team
Safety Documentation	WHS Team
Operational Procedures	Site Management
Maintenance Procedures	Site Management

7.0 Hazard Identification

The hazard identification is conducted at two levels;

- Identification of hazards and risk using Internal resources, and
- Identification of hazards and risks using external resources.

These are discussed in the following sections.

7.1 Identification of Hazards and Risks Using Internal Resources

Internal hazards and risks will be managed by several standard operating procedures (SOP). These include:

- Health and Safety Committee (Quality Board)
- Management of Change
- Induction
- Toolbox Talks
- Contractor Selection
- Inspection Checklists
- Permit to work
- Accident, Incident Reporting and Recording
- Risk Assessment
- Dangerous Goods

The site has an extensive list of procedures; hence, not all procedures can be incorporated into this document, nor is it beneficial to isolate specific procedures. To assist users to identify procedures or instructions, a detailed list of procedures and work instructions have been provided in **Section 14.0**.

7.1.1 Health and Safety Committee

The health and safety committee shall be used as a forum to discuss the following items to ensure continuity of site safety for all personnel and contractors or visitors to the site:

- To act as a forum for discussion of all concerns related to site safety and general health issues
- Monitor compliance programs with relevant Acts, Regulations and Codes of Practice
- Approve safety controls such as work permits, standard operating procedures and accident report procedures
- Monitor general standards of safety to identify hazardous practices or conditions
- Consider reports and statistics relating to accidents and time lost to recommend improvements
- Identify and discuss occupation health and safety training requirements of all personnel
- Provide timely reports to all levels of the organisation

7.1.2 Management of Change

The management of change SOP shall be used to strictly control the introduction, modification or deletion of plant, substances and systems of work at the site. The site has a defined list of activities which is applicable to operation line (i.e. warehousing/training) and manages change based on policies specific to those operations. The purpose of these specific procedures is to manage the change associated with the specific activities.

This management of change is achieved by the following:

- A written description of the proposal to identify:
  - Potential health, safety and environmental issues including emergency management and security issues,
  - Other systems affected,
  - Regulatory requirements,
  - Risk assessment requirements,
  - Competency training requirements, and
  - Where appropriate regulatory approvals are to be obtained.
- Risk assessment must be considered, and arrangements made for formal risk control documentations relating to:
  - Design,
  - Manufacture,
  - Install/Erect,
  - Environment,
  - Plant,
  - Dangerous goods,
  - Hazardous substances,
  - Hazardous atmospheres,
  - Manual handling,
  - Confined Spaces,
  - Noise, and
  - Other as identified.
- Circulation of proposal for review and notation, and
- Review by affected personnel.

7.1.3 Toolbox talks & Team Meetings

Toolbox talks occur monthly with warehouse management and warehouse staff. The procedures for managing and documenting the toolbox meetings are DHL.AU.WHS.002 and 003. Informal team safety meetings occur as required.

The site WHS committee meets at a minimum of once per month with a set agenda and formal minute taking.

7.1.4 Induction

Site hazards and risks shall be managed to new staff, contractors and visitors by completion of a site induction. Depending on the personnel dictates the level of induction required. There are three levels of induction (visitor, contractor and employee). Personnel required to complete a site induction are:

- Permanent/Casual employees,
- Contractors, and
- Visitors.

7.1.5 Contractor Selection

The hazard and risks of selecting an appropriate contractor are managed by using the Contractor Management Procedure (DHL.AU.WHS.400). These SOPs ensure that Contractors at the site have adequate internal safety management systems:

- Provide the SMS checklist to contractor or contractor organisation
- Review results using contractor assessment guide
- Provide advice and assistance if appropriate
- Approve Contractor
- Conduct contractor site induction
- Complete contractor induction register
- File all contractor documentation

7.1.6 Inspection Checklists

Risks of damage or deterioration of plant or equipment are managed at the site inspections, audits, etc which occur at a minimum of once a quarter. The procedure is documented in DHL.AU.WHS. 104, 105 and checklist in DHL.AU.WHS.Form.100

Site management are to conduct quarterly inspections of the site depending on the equipment/use and defined inspection frequency. In addition, the WHS team shall complete audits and inspections independently of the site team (on a yearly basis).

7.1.7 Accident, Incident Reporting and Recording

The accident, incident, near miss investigation reporting SOPs are available (specifically DHL.AU.WHS.100, 101 and 103). This documentation shall be used to ensure appropriate recording of documentation that results in a comprehensive and timely review of all incidents and near misses and to facilitate risk assessment and risk control measures. This is achieved by:

- Assessing incident in consultation with affected people
- Notify, if appropriate using states regulator incident reporting documentation
- Complete internal accident, incident, near miss investigation report
- Use observations, recommendations and actions as appropriate
- Conduct risk assessments as appropriate

- Use risk ranking guidelines as appropriate
- Implement risk control review for future

Results of investigations and accident/incident causes shall be identified, and the results used to update controls, procedures and practises. This will minimise the likelihood of repeat occurrences.

7.1.8 Risk Assessment

Risk assessments shall be conducted at the site and used to assess the risks of new equipment, products or vehicles at the site (DHL.AU.WHS.103). The procedure is summarised below:

- Supplier
  - Provide all hazard and risk information to the person whom the plant is supplied
- Employer
  - Complete a hazard identification of the equipment prior to placing equipment into service; and
  - Eliminate or reduce risks as far as practicable.
- Equipment Register
  - Develop an equipment register; and
  - Incorporate the risks associated with the operation of each piece of equipment at the site (risk register).
- Risk Assessment
  - Assemble an experienced group of operators and staff and conduct an assessment of the equipment, products or vehicles focusing on how an injury or accident may occur during operations;
- Observations, Recommendations and Actions
  - Using the risk assessment and the risk ranking matrix (shown in **Figure 7-1**) assign a risk ranking to each identified item and set a priority for action.

	Consequence				
Likelihood	Insignificant 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
A (almost certain)	S	S	H	H	H
B (likely)	M	S	S	H	H
C (moderate)	L	M	S	H	H
D (unlikely)	L	L	M	S	H
E (rare)	L	L	M	S	S

H	High Risk – Requires both hardware and procedures to mitigate
S	Significant Risk – Review hardware requirements and develop new procedures
M	Moderate Risk – review existing procedures for adequacy, additional procedures where required
L	Low Risk – Managed mainly with existing procedures

Consequence		Consequence Description			
Score	Indicator	Operations/ Maintenance	Financial	Safety	Environment
1	Insignificant	Short duration down time – adequate redundancy, process unaffected	Less than $5k damage	First Aid Injury (FAI), no lost time	Localised spill contained in a bund or in the immediate spill area Fugitive emissions
2	Minor	Downtime – managed without affecting process (e.g. recycle within the plant)	$5k to $100k damage	Medical Treatment Injury, no lost time	Spill contained in site Short term emissions
3	Moderate	Major non-critical equipment failure	$100k to $1M damage	Lost Time Injury or illness (LTI)	Spill escapes to stormwater or groundwater system Some complaints received over environmental issue
4	Major	Critical equipment failure Structural failure Failure to meet license conditions	$1M to $10M damage	Permanent Disability	Major spill to the stormwater system Prosecution from air emissions Numerous neighbour complaints
5	Catastrophic	Extended downtime causing loss of asset Explosion/Major Fire	More than $10M damage	Fatality	Large media coverage of environmental incident Fines from DPE

Likelihood Indicator		Likelihood Description
Score	Indicator	
A	Almost Certain	Has occurred many times, repeated occurrence
B	Likely	Occurs annually, has happened & will re-occur
C	Occasional	Has occurred once in the past, may occur some time
D	Unlikely	Has occurred in organisation at other sites, but not at this site, <10% chance of happening during the plant's life
E	Rare	Has not occurred at in the organisation but has occurred in the industry, has the potential to occur, <1% chance of happening but only in exceptional circumstances

Figure 7-1: Risk Matrix from Risk Ranking Guidelines

- Hazards and Control Measures Summary
  - Summarise all hazards and implement control measures; and

- Include in the next toolbox talk.

- Risk Control Review
  - Conduct a review of processes, equipment and procedures on a regular basis (annually) to ensure that risk controls applied are in place; and
  - Update the site risk assessment register to document reviews and any changes that may occur. Refer to management of change SOP for additional guidance.

- Safe Work Method Statement (SWMS)
  - SWMS shall be conducted for all tasks performed at the site including but not limited to;
    - Working at heights;
    - Manual handling;
    - Materials handling;
    - Maintenance (including hot work or confined space work); and
    - Product transport and storage.

7.1.9 Dangerous Goods

Risks and hazards associated with the storage of dangerous goods (DGs) and hazardous materials shall be managed by using the DG documentation forms and procedures located on the site intranet system (DHL.AU.WHS.301 and 302).

The procedures and forms ensure that all relevant documentation is recorded for DGs and hazardous materials stored at the site. Where required, a suitably qualified external consultant may be required to assist in managing DG compliance.

In addition, the procedures and forms include how to safely store, handle and despatch DGs at the site to ensure compliance with Work, Health and Safety Regulations and the Australian Dangerous Goods Code for transport of Dangerous Goods by Road and Rail (Ref. [9]).

The facility is categorised as a manifest site under the provisions of WHS Regulations 2017, Schedule 11 (Ref. [10]). As a manifest site it is necessary to notify SafeWork NSW of the types and quantities of DGs stored and handled at the site. This shall be performed using the SafeWork notification form available on the SafeWork website www.safework.nsw.gov.au.

Where changes to the storage and handling of DGs occurs, the storage profile shall be reviewed against the acknowledgment of notification of DGs on premises issued by SafeWork to determine whether a DG notification update is required. In the event that a DG notification update is required SafeWork shall be notified using the form available on the SafeWork website.

A copy of the acknowledgment of notification of DGs on premises shall be posted at the main entrance area (reception).

7.2 Identification of Hazards and Risks Using External Resources

Identification of hazards and risks using external resources shall be conducted by qualified and experienced consultants in the relevant fields to be assessed. As hazardous chemicals are stored, the studies will be updated once every 5 years as per Clause 352 of the WHS Regulations 2017 (or as indicated below, Ref. [2]) or if any change occurs at the site which may alter the risk profile of the facility. The following studies have been completed for the site:

- Fire engineering report,

- Preliminary hazard analysis,
- Fire safety study, and
- Hazardous Area Classification.

8.0 Safety Goals and Performance Standards

8.1 Safety Goals

The safety goals for the operations the facility are as follows:

Goal 1: To eliminate or minimise hazards on site.

Goal 2: To prevent the realisation of a hazard.

Goal 3: To prevent escalation of an accident event on site and off site.

Goal 4: To minimise exposure of personnel to hazards.

Goal 5: To ensure personnel can reach a place of safety in any credible accident event.

Safety goals shall be reviewed as part of the SMS annual audit and review.

8.2 Performance Standards

The safety goals are achieved through performance of personnel and equipment to a set of defined standards. Each position at the site is allocated Key Performance Indicators (KPIs) which are monitored at a local, regional, and global level for the specific position. KPIs are reviewed as part of the performance review as part of each position and personnel are measured on their achievement of their KPIs.

Career path and remuneration form part of the KPI rewards program which provides the incentive for personnel to achieve KPI objectives.

8.3 Performance Standards for Personnel

For work at the facility, all personnel and contractors shall follow relevant Operational and Maintenance Procedures as specified on the intranet system for specific tasks and operations applicable to each personnel role.

9.0 Safety Assurance

A Business Management and Quality Assurance System is adopted for the site which is available on the intranet which is set at an agency level. A detailed list of procedures and work instructions has been provided in **Section 14.0**.

The programme ensures that the Safety and Environment effectiveness is tested and updated regularly. The following elements are key components of the system.

9.1 Compliance Assurance Audits (Including Unsafe Acts Auditing)

In general, internal audits are conducted on an annual basis although some SOPs may require that specific items may be audited with a higher frequency.

The audits are conducted in accordance with the Safety Assurance Programme at the site. A site inspection shall be conducted and each point on the checklist audited (checklists are provided as part of the audit programme). A report shall be formulated with action and follow up points listed. An action completion date shall also be included on the checklist. The audits shall involve input from procedures or documentation developed for the site as shown in **Section 14.0** which may include:

- Health and Safety Committee (Quality Board),
- Management of Change,
- Toolbox Talks,
- Induction,
- Contractor Selection,
- Inspection Checklists,
- Accident, Incident Reporting and Recording,
- Plant Safety, and
- Dangerous Goods.

A corrective action report shall be developed for all actions identified from, for example, audits, accident/incidents reviews, WHS Committee Meetings or other identified actions as a result of general site inspections/reports.

Management shall review the corrective action report on a weekly basis to monitor progress to ensure progress and action completion. The site WHS Committee shall also monitor and review the corrective action report items to ensure progress continues for all corrective actions.

9.2 Safety Meetings (Consultation and Communication)

The site employs over 20 personnel and therefore is subject the safety committee requirements of the WH&S Act (2011) and the associated Regulations (2017, Ref. [2]). A site WHS safety committee has been established to represent the employees on site, this committee meets with a frequency aim of minimum monthly schedule to discuss safety issues that may have risen between meetings. Urgent safety matters may be brought directly to the attention of the site manager as required. Meetings will use minutes from the toolbox meetings as a basis for discussion.

9.3 Fire and Emergency Drills

The drills are conducted bi-annually. All staff members are involved in a review of the contents of the Emergency Response Plan (ERP), their location and responsibility. Practical exercises in fire extinguisher (dry powder) and fire hose reel handling (including foam hose reels) are carried out. Alarm location, activation and evacuation exercises are performed.

9.4 Emergency Response (Adjacent Tenants)

Site personnel are to seek confirmation of adjacent tenancy details to ensure they are notified and aware of site operations and DG storages. Site personnel are to update Emergency Response Plan with adjacent tenancy contact details such that adjacent tenant can be notified in the event of an emergency at the site.

9.5 Auditing

9.5.1 Internal

An annual audit of the SMS shall be conducted by Management. The intent of this audit is to confirm the continual effectiveness of the SMS by reviewing key and crucial inputs and outputs to the safety management process. Examples to be included within the SMS review are:

- Corrective action reports e.g. audit reports, checklists, inspections, etc.,
- Progress of actions (i.e. status of corrective actions report),
- Actual performance against performance targets and levels,
- Accident and incident investigations,
- Inspection and testing results e.g. fire safety systems,
- Compliance with legislative requirements, and
- Status of training and training progress for staff and employees.

9.5.2 Contractor Audits

Those contractors who regularly work at the site will undergo regular auditing of their SMS and Safety Management Plans (SMPs) according to the contractor selection SOP (DHL.AU.WHS.400). They will also be required to submit results of annual safety records to indicate their effectiveness in reducing and maintaining adequate workplace safety.

New contractors will have to submit an SMP and SWMS before they are contracted to work at the site. Their safety record at other facilities will also be reviewed prior to commencement of work at the facility.

Contractors will be required to work under the conditions stipulated in the Contractor Induction.

9.5.3 Site Audits

It is the responsibility of the owner of the facility to ensure that safety is maintained within the facility. This will be verified by an audit conducted by site personnel of the site reporting systems, SMS, ERP, SOPs and other onsite documentation important for the safe operation and management of the facility.

An audit report shall be developed identifying any areas requiring corrective action or improvements which can be made to the operation of the facility to ensure the continued safe operation of the facility for all personnel working within the warehouse.

9.6 Inspection and Testing of Safety Critical Systems

9.6.1 Inspection and Testing

Safety related equipment requires regular inspection and testing (e.g. fire extinguishers, hose reels, sprinklers, fire pumps, etc.). The maintenance and inspection programme established at the site includes the testing of all safety equipment as part of the scheduled maintenance programme. The basis of the inspection will be provided in the Workplace Safety Inspection SOP (DHL.AU.WHS.104).

The maintenance manual contains the relevant details for recommended testing of safety

9.6.2 Keeping of Records

The site operates an electronic stock control system based on barcodes and the reading and recording of these codes into a central database. Stock control is managed by read in/read out codes on each package/pallet which tracks movement of goods within the facility and for delivery/despatch. All stock-controlled records are maintained within the site database.

All inspection and testing will be recorded, and trends will be established such that an analysis may be conducted to aid in the easy identification of equipment that is indicating problems. Alarming trends will be brought to the attention of the Site Manager for address.

The modification control procedure includes the process for establishing new equipment on the master schedule.

10.0 Personnel Training

The objective of training is that all employees are competent to meet the safety and risk exposures of their duties.

Educational, trade or professional qualifications along with personal attributes and appropriate work experience are the criteria for all work positions. Qualifications, experience and aptitude are the key factors in the selection of staff at the site.

Contractors are responsible for the selection of their employees under their own Safety Management Systems. However, the control of contractors on site and the specific training (e.g. induction) will be performed for each contractor working at the facility as per the induction SOP (DHL.AU.WHS.400).

There are three different categories of safety training which apply:

- General induction and safety management (Visitors);
- Site specific induction (Contractors and employees); and
- Emergency response (Contractors and employees).

Employees are encouraged to undergo training relevant to operations at site. Training records are maintained in a training register and held on file. General training (and refresher training) in the above systems will be conducted on an annual cycle.

The induction training, which is provided in accordance with the Induction Procedure safety policy and objectives and the Safety Management System. The Safety Induction Checklist is used to ensure all details are effectively covered in the induction training.

11.0 SMS Documentation Integrity

To ensure the Safety Management System remains current and retains its integrity and to facilitate continuous improvement, this SMS in its entirety will be audited and reviewed biennially (once every two years) (i.e. internal audit).

This will be performed by the Site Manager and WHS team, who will conduct audits of selected components of each section of the SMS to identify the effectiveness of the SMS application. These audits will be performed annually as part of the site hazard audit.

In addition, an external hazard audit will be conducted to assess the effectiveness of the SMS system and associated SOPs at the site.

11.1 SMS Document and Data Control

A document control system is implemented at the site and is operated through the intranet. The information and records management system is a single source location for all controlled documents within the Facility.

The document control system requires all documents to be current and issued by the section manager (e.g. human resources, maintenance, operations etc.). Documents shall contain the issuing section, issue date and reference number and the next review date. This will ensure employees are provided with the most current documents.

12.0 Relationship of the SMS to Other Systems

This SMS maintains close links to other systems in operation at the site. These are:

- Business Management System, and
- Quality Management System.

The above systems are part of the Quality Assurance System which applies the principles of RC 14001 (Ref. [11]) which combines the Responsible Care initiatives along with the elements of ISO 14001 (Ref. [12]). This approach is required to ensure customers receive the appropriate products as ordered and that the products are delivered with the required quality.

13.0 Management of Change

Proposed changes which may affect the safety of employees, adjacent facilities, or safety performance of the facility, are thoroughly assessed prior to implementation and all necessary modifications to safety systems (and related documentation) are incorporated in the implementation process.

All modifications to plant and equipment (e.g. racking, forklifts, pallet jacks etc.), including additions and deletions, but excluding "replacement in kind" are considered to be "changes". Changes also include modifications to procedures, to systems and to the organisation that may affect operational safety.

Small and apparently insignificant changes (such a change of gasket material or small process changes) can contribute to an accident. Similarly, organisational or procedural changes (to emergency procedures, for example) can negate an arrangement that is in place to minimise escalation of an incident.

It is fundamental that the implication of change at the facility or equipment, technical and functional integrity is always considered. It is also important that the changes are recorded in engineering documents in a mutually consistent manner.

Control and management of changes to hardware and procedures are carried out using a "Change Request Procedure".

Upon changes in adjacent tenancy, new tenants should be informed of site emergency procedure and included within emergency training, as outlined in the Emergency Response Plan.

The Site Manager is responsible for ensuring that changes are appropriately considered and rejected or are approved and recorded before they are implemented.

14.0 Supplementary Documentation

14.1 List of Supporting Procedures and Documents

A set of procedures has been developed and other documents that form the core elements of the SMS. These are listed in **Table 14-1**.

Table 14-1: List of Policies and Procedures

Item	Topic	QMS Documents	WHS
1	Management of Change Procedure	DHL.AU.WHS.109	
2	Induction Procedure	DHL.AU.WHS.908 DHL.AU.WHS.Form.407 DHL.AU.WHS.Form.912	
3	Toolbox Talk Procedure	DHL.AU.WHS.003	A list of toolbox talk topics are provided for each month of the year. These topics are covered in the scheduled monthly Toolbox talks. In addition there are regular ad hoc toolbox talks to address/prevent incidents. Signed attendance registers are kept for each toolbox talk.
4	Contractor Selection Procedure	DHL.AU.WHS.400	
5	Inspection Checklists (Auditing)	DHL.AU.WHS.104 DHL.AU.WHS.Form.100 DHL.AU.WHS.Form.406	
6	Permit to Work Procedure	DHL.AU.WHS.543 DHL.AU.WHS.Form.501 DHL.AU.WHS.Form.509 DHL.AU.WHS.Form.513	
7	Accident, Incident Reporting and Recording Procedure	DHL.AU.WHS.100	
8	Risk Assessment Procedure	DHL.AU.WHS.103	
9	Dangerous Goods SOP/procedures	DHL.AU.WHS.302	
10	Quality assurance procedures	Nil.	
11	Scheduled maintenance procedures	DHL.AU.WHS.Form.528	
12	Training Procedures	DHL.AU.WHS.908	

Item	Topic	QMS Documents	WHS
13	Environmental, Health and Safety	DHL.AU.WHS.531 DHL.AU.WHS.803	
14	Quality assurance	Nil.	
15	Maintenance of the Safety Management System	DHL.AU.WHS.701	
16	Safety Documentation	DHL.AU.WHS.002 DHL.AU.WHS.004 DHL.AU.WHS.104 DHL.AU.WHS.506	
17	Operational Procedures	DHL.AU.WHS.Form.810	
18	Maintenance Procedures	DHL.AU.WHS.202 DHL.AU.WHS.808 DHL.AU.WHS.811 DHL.AU.WHS.Form.810	
19	Organisation structure image	Nil.	

15.0 References

[1] Department of Planning, “Hazardous Industry Planning Advisory Paper No. 9 - Safety Management System Guidelines,” Department of Planning, Sydney, 2011.

[2] SafeWork NSW, “Work Health and Safety Regulation,” SafeWork NSW, Lisarow, 2017.

[3] Standards Australia, AS 1940:2017 - Storage and Handling of Flammable and Combustible Liquids, Sydney: Standards Australia, 2017.

[4] Standards Australia, “AS 2118.1:2017 - Automatic Fire Sprinkler Systems General Systems,” Standards Australia, Sydney, 2017.

[5] Standards Australia, “AS/NZS 3833:2007 - Storage and Handling of Mixed Classes of Dangerous Goods, in Packages and Intermediate Bulk Containers,” Standards Australia, Sydney, 2007.

[6] NSW Department of Planning, “Best Practice Guidelines for Contaminated Water Retention and Treatment Systems,” NSW Department of Planning, Sydney, 1994.

[7] Standards Australia, AS/NZS 60079.10.1:2009 - Explosive Atmospheres Part 10.1: Classification of Areas, Explosive Gas Atmospheres, Sydney: Standards Association of Australia, 2009.

[8] Standards Australia, AS/NZS 60079.14:2017 - Explosive Atmospheres Part 14: Electrical Installations, Design, Selection and Erection, Sydney: Standards Australia, 2017.

[9] Road Safety Council, The Australian Code for the Transport of Dangerous Goods by Road and Rail Edition 7.4, Canberra: Road Safety Council, 2016.

[10] NSW WorkCover, “Work Health and Safety Regulation,” NSW WorkCover, Lisarow, 2011.

[11] NSF International, “RC 14001 - Environmental Management Systems,” NSF International, 2015.

[12] Standards Australia, “ISO 14000 Series - Environmental Management Systems,” Standards Australia, Sydney.