

Oatley RSL Sub-Branch Inc. – Sub-Contractor Management Procedure

Purpose

The purpose of this Sub-Contractor Management Procedure is to ensure the highest standards of Work Health and Safety (WHS) compliance when engaging external contractors and suppliers who provide goods and services to the Oatley RSL Sub-Branch Inc., or work on its properties and infrastructure. This procedure aims to protect the safety of all personnel, visitors, and stakeholders, aligning with relevant Australian legislative requirements, including the NSW Work Health and Safety Act 2011, NSW Work Health and Safety Regulations 2017, and applicable codes of practice.

Scope

This policy applies to all external contractors and suppliers engaged directly by the Oatley RSL Sub-Branch Inc. or through its property lessees, for activities conducted on or around the Sub-Branch properties and infrastructure. It covers the entire lifecycle of contractor engagement — from selection through to project completion and review.

Policy Statement

The Oatley RSL Sub-Branch Inc. is committed to providing a safe and healthy environment for all RSL Members, workers, contractors, visitors, and community members. We recognise our legal and moral obligations to manage contractor activities in accordance with the NSW Work Health and Safety Act 2011, the NSW Work Health and Safety Regulations 2017, and other relevant legislation and standards. We will ensure all contractors meet our high safety standards and regulatory requirements before undertaking work.

Responsibilities

Management and Supervisors

- The following responsibilities lie with the Lessee if the contractors are engaged by the Lessee on behalf of the Oatley RSL Sub-Branch and or the contractors/suppliers are paid for by the Oatley RSL Sub-Branch Inc but not directly engaged by the Oatley RSL Sub-Branch Inc.
- Incorporate explicit WHS clauses into all contractor agreements, emphasising legislative obligations and safety requirements.

- Effectively communicate site-specific risks and safety procedures to contractors prior to work commencement.
- Ensure contractors provide current Certificates of Insurance (including public liability and workers' compensation), relevant qualifications, licences, and a detailed risk management plan.
- Conduct thorough assessments of contractors' safety management systems and procedures before approval. Keep records of this assessment.
- Monitor and review contractor safety performance regularly, including at project completion and during annual reviews.
- Ensure appropriate training and supervision are provided to contractors and their personnel.
- Maintain records of contractor assessments, incident reports, and safety documentation.
- Ensure contractors participate in pre-start meetings and safety inductions, including site-specific hazards and control measures.

Contractors and Suppliers

- Comply with all relevant WHS legislation, regulations, codes of practice, and this policy.
- Conduct risk assessments and implement appropriate control measures in accordance with approved safe work practices.
- Provide valid current licences, certificates, and insurance documentation prior to commencement.
- Attend safety meetings and participate in site inductions and ongoing safety reviews.
- Report hazards, incidents, or injuries promptly to the Oatley RSL Sub-Branch Inc. management.
- Cooperate in safety audits, inspections, and performance reviews.
- Ensure use of personal protective equipment (PPE) and adherence to safety protocols at all times.

Procedure for Engaging Contractors

1. Assessment and Selection:

- Execute a formal assessment using the Subcontractor Assessment Form (Supplier – Contractor Prequalification Checklist OSB-WHS-004).
- Obtain and review documentation including:
 - WHS Management System information.
 - Safe Work Method Statements (SWMS) or Safe Operating Procedures (SOPs)/Job Safety Analysis (JSA).
 - Licences and qualification certificates.
 - Current Public Liability and Workers' Compensation Insurance Certificates.
 - Relevant training records.
- Verify the contractor's compliance with Australian Standards and relevant legislation. The above must be completed prior to the formal engagement of the Supplier-Contractor. Contractors/Suppliers engaged by the Oatley RSL Community Club (Lessee) on behalf of the Oatley RSL Sub-Branch Inc can conduct the Assessment and Selection process using either this policy and the Oatley RSL Sub-Branch Inc Supplier – Contractor Prequalification Checklist or via the Lessee's own internal process and procedure. Copies of the assessment and review must be provided to the Oatley RSL Sub-Branch board prior to engagement of the Supplier/contractor and written approval must be provided by a board member of the Oatley RSL Sub-Branch Inc prior to formal engagement of the Supplier/Contractor.

2. Approval and Induction:

- The review and approval of Suppliers/Contractors will be carried out by a trained board member of the Oatley RSL Sub-Branch Inc and the supplied documentation will be filed and stored electronically by the Oatley RSL Sub-Branch Inc Board for a period of 5 years. Contractors engaged by Oatley RSL Community Club (Lessee) should have these documents also

filed with the Oatley RSL Community Club admin staff for a period of 5 years.

- Upon successful assessment, approve the contractor for engagement.
- Conduct a site-specific safety induction, including hazards, risk controls, and emergency procedures. This can be conducted verbally by the Oatley RSL Community Club shift manager/s if the contractor is engaged by Oatley RSL Community club on behalf of Oatley RSL Sub-Branch Inc.
- Record contractor details on the Approved Contractor Register.
- Include contractors in pre-start meetings and safety briefings.

3. Contractor Engagement and Supervision:

- Ensure contractors understand their WHS responsibilities. If engaged by the Oatley RSL Community Club (lessee) on behalf of the Oatley RSL Sub-Branch Inc, the engaging staff member from the Lessee is to ensure that this occurs.
- Assign a responsible supervisor or manager to oversee contractor activities. This can be done by the Oatley RSL Community Club shift manager/s if the contractor is engaged by Oatley RSL Community club on behalf of Oatley RSL Sub-Branch Inc
- Monitor ongoing safety performance and compliance during the project.
- Document all safety-related communications and incidents.

4. Review and Reassessment:

- Conduct a safety performance review at project completion.
- Reassess annually for ongoing contractor approval.
- Remove contractors from the Approved Contractor Register if performance is unsatisfactory or in breach of safety standards.
- These reviews can be conducted (in-house/independently) by the Oatley RSL Community Club if the contractor is engaged by Oatley RSL Community club on behalf of Oatley RSL Sub-Branch Inc on an annual basis in accordance with the Oatley RSL Community Club's WHS management procedures.
- Contractors/Suppliers engaged by the Oatley RSL Community Club (Lessee) on behalf of the Oatley RSL Sub-Branch Inc, can be reviewed and assessed/reassessed by the Lessee utilizing the Lessee's internal policies and procedures, copies of the review/reassessment must be provided to

the Oatley RSL Sub-Branch Inc on completion of the review/Reassessment.

Legal and Regulatory Framework

This policy adheres to relevant Australian legislation including, but not limited to:

- **NSW Work Health and Safety Act 2011**
- **NSW Work Health and Safety Regulations 2017**
- **Model Work Health and Safety Australian Standards**
- **Workplace Health and Safety (WHS) Codes of Practice**

These regulations impose duties on the Oatley RSL Sub-Branch Inc. as a host organisation, notably the obligation to ensure, so far as is reasonably practicable, that the workplace is safe and without risks to health. Contractors are also directly responsible for complying with their legal WHS duties.

Failure to Comply

Failure to adhere to the requirements of this procedure will result in immediate disqualification and removal from the property.

If a subcontractor fails to comply with the agreed WHS requirements, an issue resolution and non-conformance process will be activated.

All work in relation to that activity is to cease until the relevant Manager is satisfied that adequate risk controls are in place to avoid risk of injury.

The Manager will continue to follow up and review the contractor and if the non-compliance continues, the Manager (in consultation with WHS representative) will decide on the appropriate action including the following measures:

- Termination of a contract and failure of not being awarded any further contract work due to the contractor's poor WHS performance, including one-off instances or continuous breaches of WHS requirements.
- Informing all workers of the removal from the Approved Contractor Register.
- All records relating to contractor's performance should be kept for a period of 5 years.

Contractors sub-contracting work out

Where an approved contractor uses their own subcontractors, Oatley RSL Sub-Branch Inc will ensure that their contractor has a process in place to ensure the subcontractor has an appropriate safety system that is aligned to the safety requirements of the work to be conducted.

Oatley RSL Sub-Branch Inc will also ensure that verification of the subcontractor and contractor's system elements have been appropriately reviewed.

Audit Records

- **SUPPLIER – CONTRACTOR PRE-QUALIFICATION CHECKLIST - Doc OSB-WHS-Doc-004**