



# Safety Risk Management Procedure

# **Brief description**

This Procedure describes the methodologies used at GPC for the management of activity risks to assist in identifying hazards that may exist in the work methods and the work environment, assessing the risk associated with those hazards and provision for documenting the risk mitigation measures (controls) before work can commence – PORT, Job Safety Analysis (JSA), Formal Risk Assessment, Safe Work Method Statements and Safe Work Instruction.

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# **1** Terms and definitions

Terms that are capitalised and not otherwise defined in this Procedure are defined in the GPC Corporate Glossary Instruction (as listed in Appendix 1 – Related documents).

"Complex task" means a task that involves application of more than one Procedure (e.g. a hot work in a confined space, crane lift with barricaded exclusion zone) or a task that has various job steps which would make use of a PORT impractical in identifying all the hazards and controls effectively.

"Routine task" means a task performed at least once every three months.

"Safe Work Instruction (SWI)" means a document that provides instructions on how to safely carry out a task and/or use equipment. It is a quality controlled document that is written with stakeholder input and approved by the document owner and specifies how a task is to be carried out and the risk controls required. It is underpinned by a risk assessment.

"**SWMS**" means a Safe Work Method Statement. A SWMS is a document that sets out the high risk construction work activities to be carried out at a workplace, the hazards arising from these activities and the measures to be put in place to control the risks.

"Visitor" means a person who is wishing is gain access to GPC sites for the purposes of a tour or meeting with GPC personnel. A Visitor is not permitted to undertake work at any time during their visit.

# 2 Introduction

#### 2.1 Purpose

This Procedure describes the main methodologies used at GPC for the management of activity risks to assist in identifying hazards, assessing the risk associated with those hazards and provision for documenting the risk mitigation measures (controls) before work can commence – PORT, JSA, SWMS and Safe Work Instruction. These safety risk management tools apply equally for identifying hazards and risk associated with health, safety, environment, security (including cybersecurity), regulatory compliance, financial impact, GPC reputation, cargo handling / service delivery, marine operations and project delivery.

#### 2.2 Scope

This Procedure applies to all tasks undertaken by GPC Workers.

Contractors and port users shall have their own safety management / risk management tools appropriate to their risk exposure and apply them whilst they are operating on GPC owned and operated sites.

Visitors are not permitted to undertake 'work' as such and are required to follow the directions given by their GPC Representative or host whilst they are on site.

#### 2.3 Objectives

The objective of this Procedure is to:

- provide a consistent approach for how and when to identify hazards and assess risks associated with a task and the work environment prior to undertaking a task and throughout the duration of the task;
- define when a safe system of work is required to be documented prior to undertaking a task; and

ensure all Workers follow a process to identify hazards and assess the risk associated with those hazards and mitigate those risks to ensure individual safety, the safety of others and to protect property and the environment from damage or harm.

# 3 Roles and responsibilities

Role	Responsibilities
CEO	To ensure that GPC complies with its obligations by:
	<ul> <li>ensuring appropriate systems and resources are available to suitably manage hazards and risks</li> </ul>
	<ul> <li>reviewing and authorising JSAs / SWIs within their risk authorisation level</li> </ul>
	<ul> <li>conducting interactions and audits to monitor quality of risk identification and management</li> </ul>
	<ul> <li>coaching Employees on effective risk management as required</li> </ul>
Executive General Manager	To ensure that GPC complies with its obligations by:
	<ul> <li>reviewing and authorising JSAs / SWIs within their risk authorisation level</li> </ul>
	<ul> <li>conducting interactions and audits to monitor quality of risk identification and management</li> </ul>
	<ul> <li>coaching Employees on effective risk management as required</li> </ul>
Managers	To ensure that GPC complies with its obligations by:
	<ul> <li>conducting interactions and audits to monitor quality of risk identification and management</li> </ul>
	<ul> <li>coaching Employees on effective risk management as required</li> </ul>
Superintendent	To ensure that GPC complies with its obligations by:
	<ul> <li>enabling additional controls for Workers when required</li> </ul>
	<ul> <li>following up on temporary controls identified with hazard notifications or work orders</li> </ul>
	<ul> <li>conducting interactions and audits to monitor quality of risk identification and management</li> </ul>
	<ul> <li>coaching Employees on effective risk management as required</li> </ul>
Supervisors	To ensure that GPC complies with its obligations by:

	<ul> <li>reviewing compliance with, and the quality of, SWIs, SWMSs, JSAs and PORTs of Employees in their control</li> </ul>
	<ul> <li>coaching Employees on effective risk management as required</li> </ul>
	<ul> <li>enabling additional controls for Employees when required</li> </ul>
	<ul> <li>following up on temporary controls identified with hazard notifications or work orders</li> </ul>
	<ul> <li>ensuring reviewed JSA's and SWIs are updated into the library</li> </ul>
	<ul> <li>approving JSAs as per the GPC authorisation and escalation table within the Enterprise Risk Management Procedure</li> </ul>
	<ul> <li>ensuring signed PORTs, JSAs &amp; SWIs are attached to SAI360 for related incidents</li> </ul>
	<ul> <li>ensuring Employees are trained in the GPC Safety Risk Management course</li> </ul>
	<ul> <li>conducting interactions and audits to monitor quality of risk identification and management</li> </ul>
GPC Contract Supervisors	To ensure that GPC complies with its obligations by:
	<ul> <li>reviewing contractor Risk Assessments for Contractors in their control</li> </ul>
	<ul> <li>reviewing safety risk management tools of Contractors they engage</li> </ul>
	<ul> <li>conducting relevant consulting, cooperating and coordinating activities to inform Contractors of operational risks or risks from simultaneous operations</li> </ul>
	<ul> <li>conducting interactions and audits to monitor quality of risk identification and management</li> </ul>
Safety and Environment	To ensure that GPC complies with its obligations by:
	<ul> <li>providing coaching on the application of the Procedure</li> </ul>
	<ul> <li>monitoring effectiveness of this process through regular audits</li> </ul>
GPC Employees	To ensure that GPC complies with its obligations by:
	<ul> <li>applying the relevant risk assessment process as per this Procedure</li> </ul>

	<ul><li>taking reasonable care for their own safety</li><li>complying with this Procedure</li></ul>
Contractors and port users	<ul> <li>To ensure that GPC complies with its obligations by:</li> <li>ensuring they are applying their companies Safety Risk Management system</li> </ul>

# 4 Safety Risk Management

#### 4.1 Tools

The primary tools for facilitating the risk management activities within this Procedure are outlined in Table 1. In addition to these, a formal risk assessment tool is available to conduct higher level risk assessments. This tool is more commonly used for underpinning management procedures or facilitating project risk assessments.

Equivalent tools can be utilised by contractors in accordance with section 4.6.

GPC Procedures support the risk management tools by providing overarching systems of work and guidelines for high risk activities, operational work hazards and legal obligations. JSAs and Safe Work Instructions link and highlight specific controls from the Procedures in terms of their application to tasks.

Table 1 Risk management tools for task-based application

	PORT	JSA	Safe Work Instruction	Safe Work Method Statement
Intent	<ul> <li>Assess 'on the job' conditions to identify any hazards that are relevant to the work in that particular work environment at that particular point in time</li> <li>Assess any changes that occur throughout task</li> </ul>	<ul> <li>Describes the task step-by-step, identifying the hazards in each step and the controls required to make it safe</li> <li>Risk assessment for each hazard before and after controls</li> </ul>	<ul> <li>Describes how to complete a task while highlighting associated hazards and controls required</li> </ul>	<ul> <li>Identify work is high risk construction work and identify the hazards, risks and control measures to be implemented</li> <li>Describe how control measures will be implemented, monitored and reviewed</li> <li>Requirement for high risk construction work under Work Health and Safety ("WHS") Legislation</li> </ul>

	PORT	JSA	Safe Work Instruction	Safe Work Method Statement
Use for	<ul> <li>Very low risk and non- Complex tasks</li> <li>Prior to tasks supported by a Safe Work Instruction or JSA</li> </ul>	<ul> <li>Low risk and above tasks (including tasks identified as high risk in the Decision Making Tool in Appendix 2)</li> <li>Complex tasks</li> <li>New tasks</li> </ul>	<ul> <li>Complex tasks with set standard work methodology</li> <li>Routine tasks</li> </ul>	High risk construction work per WHS Legislation
Who	<ul> <li>As an individual or group</li> <li>All parties discuss the identified hazards and agree on controls</li> <li>Each person to complete their own PORT or one is written for all the group to sign onto</li> </ul>	<ul> <li>As a group of any size</li> <li>Workers familiar with task must develop</li> <li>All parties discuss the identified hazards and agree on controls</li> <li>Everyone in the group must sign onto the JSA prior to the task</li> </ul>	<ul> <li>Written by a Subject Matter Expert ("SME") or stakeholder group and approved by a leader depending on risk level</li> <li>Workers read, understand and comply with the Safe Work Instruction</li> </ul>	<ul> <li>Contractors may prepare a SWMS</li> <li>For Contractors         <ul> <li>GPC Contract Supervisor ensures that a SWMS is prepared before the proposed work starts</li> </ul> </li> <li>Workers familiar with the task are involved with the development of the SWMS</li> <li>Workers ensure that the SWMS is reviewed and revised if necessary</li> <li>Workers carry out the work in accordance with the SWMS</li> <li>NOTE – GPC's JSA template covers requirements of SWMS</li> </ul>
Where is it kept when performing task associated	• On the job	<ul> <li>Readily accessible and available for review</li> <li>If working under a Safe Work</li> </ul>	Unless a formal training package exists, the Safe Work Instruction is to be readily accessible and available for	Readily accessible and available for review

PORT	JSA	Safe Work Instruction	Safe Work Method Statement
	Instruction or formal training package, do not need to refer to JSA	Workers to refer to	

#### 4.2 PORT Process

The intent of the PORT is to identify the hazards that are relevant to the work in that particular work environment at that particular point in time. It is to assess the 'on the job' conditions and to monitor conditions as they change. There are useful prompts provided in the PORT Pocket Book to support Workers through the process such as a list of damaging energies.

When on the job site, the Worker or work group must observe the work environment and consider the task at hand. The work group must discuss the identified hazards and agree on control measures required. Identified hazards and controls must be documented in the PORT prior to starting work. Where hazards are already identified on the JSA or within the SWI, workers do not need to duplicate these onto the PORT.

The completed PORT must be kept on the job site for the duration of the task.

A process of when to use a PORT is provided in Appendix 2:  $\ensuremath{\mathsf{PORT}}$  / JSA decision making tool.

#### (a) Review of the PORT during the task

Throughout the task, conditions may change that may render your original controls ineffective or new hazards are introduced that need to be controlled.

Key triggers for stopping work and reviewing the PORT includes, but is not limited to:

- change of conditions i.e. wind direction, rain, adjacent work groups etc.
- long break (generally >1hr) i.e. crib breaks, shift change etc.
- work scope changes i.e. check your isolation covers any additional scope etc.

#### (b) What to do with your PORT at the end of the task

If you have identified hazards in your PORT that require permanent risk controls to be put in place, communicate this to your Supervisor for follow up. The follow up may include raising a work order or a hazard notification.

If there was an incident associated with the task, the person responsible to investigate must attach the PORT to the incident record in SAI360.

#### (c) Tasks that do not require a PORT

The following tasks have been formally risk assessed as very low risk and are deemed exempt from requiring a PORT. They include:

- general office duties;
- walking in non-operational areas;

- driving a light vehicle in 'normal' conditions; and
- daily checks on light vehicles including: pre-starts, re-fuelling and housekeeping.

The Risk Assessment – PORT Exemption is available to review.

Transit (walking) to a task in an operational area may also be excluded from requiring a PORT if the area is very low risk and access is on a regular basis (e.g. designated walkways, stairways and the like).

#### 4.3 JSA Process

A Job Safety Analysis ("**JSA**") is developed for new tasks, low risk or above tasks (including tasks identified as high risk in the Decision Making Tool in Appendix 2), Complex tasks or to underpin a Safe Work Instruction. The JSA template provides the means for identifying inherent hazards associated with each step of a particular task, assessing the risk associated with each of the identified hazards and providing for risk controls to be listed to mitigate the risk to an acceptable level. The implementation of controls shall be facilitated by the Worker, work team or Leader prior to starting work. When working under a JSA, Workers must ensure they have reviewed and signed the JSA prior to the task.

Appendix 2 details the process for the application of a JSA.

The GPC JSA template is designed to capture all the required elements of a Safe Work Method Statement ("**SWMS**") for high risk construction work. Any high risk construction work must be identified on the JSA as well as control implementation, review and monitoring requirements.

Workers involved in the relevant task are responsible for the development of JSA's. When developing a JSA the Original Equipment Manufacturer ("**OEM**") manuals (where relevant) should be consulted to understand recommended tasks steps and controls. Authorisation of the JSA is based on the residual risk as detailed in the Risk Authorisation and Escalation table within the Enterprise Risk Management Procedure.

#### 4.4 Safe Work Instruction process

A Safe Work Instruction ("**SWI**") provides instructions on how to carry out a task and / or use equipment. A SWI is generally used for a Routine task (performed more than three monthly). It is a quality controlled document that is written with stakeholder input, approved by the document owner (relevant Leader pending risk level) and is published and accessible on Neptune. A SWI specifies how a task is to be carried out and the risk controls required. It is underpinned by a JSA / formal risk assessment to ensure that all hazards associated with each step are considered and agreed controls are included in the SWI.

Appendix 2 details the process for the application of a SWI.

Supervisors are responsible for the development of SWIs, however can delegate to Workers familiar with the task. A cross section of Workers familiar with the task must be a part of development and any review.

Workers must read, understand, sign-on and comply with the SWI and the SWI must be reviewed as per the agreed timeframe. SWIs shall be reviewed for currency by the document owner and re-signed by Workers based on a frequency determined by the 'after controls' risk rating:

- Annually for an extreme risk outcome;
- Every two years for a high risk outcome;
- Every three years for a medium risk outcome;

- Every four years for a low risk outcome; and
- Every five years for a very low risk outcome.

Certain circumstances may warrant a SWI to have a training package developed. Operating a Dozer is an example of when a SWI will underpin a training package. The Competency to Operate Procedure provides further details on what SWIs require a training package.

#### 4.5 JSA / SWI Registers

All JSAs/SWIs will be stored within the relevant department register as outlined below that are accessible via Neptune.

Where Employees have been required to create a new JSA or make updates to an existing JSA, the Supervisor must review the content to ensure it is of satisfactory quality. If the residual risk is below Medium, the Supervisor can approve the new JSA or amendments once satisfied. If the residual risk is Medium or above, the Supervisor must escalate to the relevant authority level for approval. On completion of the task, the JSA must be handed in and the Supervisor/work group must arrange for the JSA to be typed up and formatted as required. The JSA must be saved in e-Docs under file path 8/10/5/1 as either a new document (for new JSA's) or as a new version (for updated JSA's). New JSA's must be updated into the work group's JSA/SWI Register for future reference. Existing registers include:

- Production JSA / SWI Register
- Earthworks JSA / SWI Register
- Maintenance JSA / SWI Register
- Building Trades JSA / SWI Register
- Marina JSA / SWI Register
- Parks and Recreation JSA / SWI Register
- Port Alma JSA / SWI Register
- Port of Bundaberg JSA / SWI Register

All existing and new JSA / SWI Registers will be added to the 'Safety Document Library' on Neptune.

Where applicable, work packs are to be updated to attach new or amended JSAs / SWIs to job lists. If there is a SWI, the underpinning JSA does not need to be part of the work pack.

A summary of the JSA process for new and updated JSA's is provided in Appendix 3.

Supervisors shall ensure that revised JSA's and SWIs are updated in the register and made available on Neptune.

#### 4.6 Contractor requirements for Task Risk Management

In accordance with the Health, Safety and Environment ("**HSE**") Management of Contractors Procedure, contractors are permitted to use their own pre-task hazard/risk assessment process as outlined in their safety risk management system. The GPC Contract Supervisor, where appropriate, must consult, cooperate and coordinate with the relevant Contractor to inform of any operational risks or risks arising from simultaneous operations.

### 4.7 Monitoring for quality assurance and compliance

Leaders must monitor Workers under their control to ensure that completed risk assessments are of a satisfactory quality and that this Procedure is being complied with. Monitoring shall occur through on the job interactions, planned task audits and reviews of completed risk assessments.

Where quality or compliance non-conformances are identified, leaders must follow up with adequate coaching and/or performance management.

#### 4.8 Training requirements

All GPC Workers (including Contractors embedded within a team) complete Enterprise Risk Management Corporate Mandatory Training as well as Safety Risk Management training.

PORT and JSA training is available to Contractors who have been instructed by their GPC Representatives to attend. Example would be where Contractors are under the direction of GPC.

# 5 Appendices

#### 5.1 Appendix 1 – Related documents

#### (a) Legislation and regulation

Key relevant legislation and regulation, as amended from time to time, includes but is not limited to:

Туре	Legislation/regulation
State Acts	Work Health and Safety Act 2011 (Qld)
	Work Health and Safety Regulations 2011 (Qld)
	How to manage work health and safety risks – Code of Practice
Other	Australian Standard AS/NZS ISO 31000:2009: Risk management – Principles and guidelines

#### (b) Gladstone Ports Corporation documents

The following documents relate to this Procedure:

Туре	Document number and title
Tier 1: Policy	#365624 Safety Policy
	#1412364 Enterprise Risk and Resilience Policy
Tier 2: Standard/Strategy	#854303 Safety Management Framework Standard
	#829152 Enterprise Risk Management Standard
	#934182 Learning and Development Standard

Туре	Document number and title
<b>Tier 3:</b> Specification/ Procedure/Plan	#936233 Enterprise Risk Management Procedure
	#1119504 HSE Management of Contractors Procedure
	#1606001 Competency to Operate Procedure
<b>Tier 4:</b> Instruction/Form/ Template/Checklist	#120673 Template – Job Safety Analysis (JSA)
	#1640654 Template – Safe Work Instruction (SWI)
	#1478721 Template – PORT Pocket Book
	#1478730 Template – PORT Pocket Book – Damaging Energy Prompt Card
	#1569283 Template – A4 Page PORT with JSA/PORT decision making flowchart
	#1458717 – PORT/JSA decision making tool basic
	#1252624 Formal Safety Risk Assessment Template
	#1621179 GPC Corporate Glossary Instruction
Other	#1472775 Risk Assessment – PORT Exemption
	#1425748 Presentation – Safety Risk Management Training (PORT / JSA)
	#1535071 Production JSA / SWI Register
	#1635132 Earthworks JSA/SWI Register
	#1458564 Maintenance JSA / SWI Register
	#1562231 Marina JSA / SWI Register
	#1539120 Parks and Recreation JSA / SWI Register
	#1765045 Port Alma JSA / SWI Register
	#1763248 Port of Bundaberg JSA / SWI Register
	#1792185 Building Trades JSA / SWI Register



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- Rigging - Dogging - Crane operations - Tree clearing (Earthworks) - Spills to land or water - Dust emissions - Pest management / biosecurity

- Daily checks for light vehicles including: pre-starts, re-fuelling and house keeping

# 5.3 Appendix 3 – JSA process for new and updated JSA's



# 5.4 Appendix 4 – Revision history

Revision date	Revision description	Author	Endorsed by	Approved by
15/03/2019	Document created	Tony Young, Safety Manager	Rowen Winsor, People Community and Sustainability General Manager	Tony Young, Safety Manager
08/04/2019	Minor amendment to PORT exclusions	Tony Young, Safety Manager	Rowen Winsor, People Community and Sustainability General Manager	Tony Young, Safety Manager
24/07/2019	Minor amendments to low and very low risk references	Tony Young, Safety Manager	Rowen Winsor, People Community and Sustainability General Manager	Tony Young, Safety Manager
04/08/2020	Legal review by HSF. Changes to Safe Work Instruction, JSA and PORT requirements and leader's responsibilities for monitoring for quality assurance.	Kirsty Iszlaub, Acting Safety Specialist – Systems and Projects	Rowen Winsor, People Community and Sustainability General Manager	Tony Young, Safety Manager
07/11/2022	Simplification of Procedure to provide better clarity. v10 published	Kirsty Iszlaub, Safety and Training Specialist - Systems	Tony Young, Safety and Training Manager	Richard Haward, Executive General Manager Safety & ESG
06/02/2023	Clarification of intent / application of PORT. JSA and SWI following workforce feedback sessions.	Kirsty Iszlaub, Safety and Training Specialist - Systems	Tony Young, Safety and Training Manager	Richard Haward, Executive General Manager Safety & ESG
14/02/2023	Updates to flow chart, signing of JSAs and	Kirsty Iszlaub, Safety and	Tony Young, Safety and	Richard Haward, Executive

Revision date	Revision description	Author	Endorsed by	Approved by
	location of JSAs/SWIs per leader feedback v12 published	Training Specialist - Systems	Training Manager	General Manager Safety & ESG