



# Safety Culture Procedure

## Brief description

This Procedure provides the framework to enable the identification of safety behaviours that align or misalign with GPC's expectations and legislative duties and obligations.

### Document information

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### Document accountability

Role	Position
Owner	Executive General Manager Safety and ESG
Custodian	Safety Manager

Approved by **Executive General Manager Safety and ESG on 28/05/2024**

If you require any further information, please contact the Custodian.

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## Contents

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<b>1</b>	<b>Terms and definitions</b>	<b>3</b>
<b>2</b>	<b>Introduction</b>	<b>3</b>
2.1	Purpose	3
2.2	Scope	3
2.3	Objectives	3
<b>3</b>	<b>GPC Safety Culture Procedure</b>	<b>3</b>
3.1	Safety Culture Framework – Above the Line and Below the Line behaviours	3
3.2	Everyone’s behaviour	4
3.3	Supervisor / Superintendent behaviours	6
3.4	Manager / Executive Leadership Team behaviours	7
3.5	Management of behaviour	9
<b>4</b>	<b>Appendices</b>	<b>9</b>
4.1	Appendix 1 – Related documents	9
4.2	Appendix 2 – Revision history	10

# 1 Terms and definitions

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In this Procedure:

**“Above the Line”** means open and positive thinking and behaviour whereby a person responds constructively, displaying responsibility and where appropriate, accepting accountability for a given situation.

**“Below the Line”** means closed and negative thinking and behaviour whereby a person responds to a given situation through denial, excuses, defensiveness and blame to avoid responsibility and criticism.

**“Safety Culture”** means the behaviours exhibited by Workers that impact positively or negatively on Workers safety and plant safety. It can be characterised as ‘the way we do things around here’.

**“Safety Culture Framework”** means the key criteria that outlines the way Managers/Executive Leadership Team, Supervisors/Superintendents and all Workers should collectively think and behave in relation to safety to meet GPC’s expectations, support GPC’s values and legislative duties and obligations.

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).

## 2 Introduction

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### 2.1 Purpose

This Procedure provides the framework to enable the identification of safety behaviours that align or misalign with GPC’s expectations and legislative health and safety duties and obligations. It details the specific attributes of the Above the Line behaviours that all Workers must demonstrate and strive for to build GPC’s Safety Culture and the Below the Line behaviours that must be avoided.

### 2.2 Scope

This Procedure applies to all Workers undertaking work for, or on behalf of, GPC at sites controlled by GPC; and visitors to these sites.

### 2.3 Objectives

The objectives of this Procedure are to:

- (a) Ensure compliance with the WHS Act;
- (b) Identify the desired safety behaviours to instil a positive Safety Culture; and
- (c) Ensure all Workers know and understand their safety behavioural expectations and accountabilities.

## 3 GPC Safety Culture Procedure

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### 3.1 Safety Culture Framework – Above the Line and Below the Line behaviours

Culture is the way we do things and the behaviours we display. The Safety Culture Framework (see Figure 1) provides Workers with a structure aligned to their role level to assist in

understanding the safety behaviours that align with GPC’s expectations, Code of Conduct and values and aid in developing GPC’s desired Safety Culture.

‘Above the Line’ and ‘Below the Line’ behaviours signify the choice we make in regards to how we respond to a situation or automatically act. Operating above the line signifies a choice to ‘Act On It’ and is demonstrated through ownership, accountability and responsibility. Operating below the line signifies a choice to ‘Avoid’ and is demonstrated through blame, excuse, denial and defensiveness.

All Workers are required to demonstrate and display appropriate Above the Line behaviours as required for their role and should strive to avoid Below the Line behaviours at all times.

Employees receive awareness of Above the Line and Below the Line behaviours through *Switch On* training.

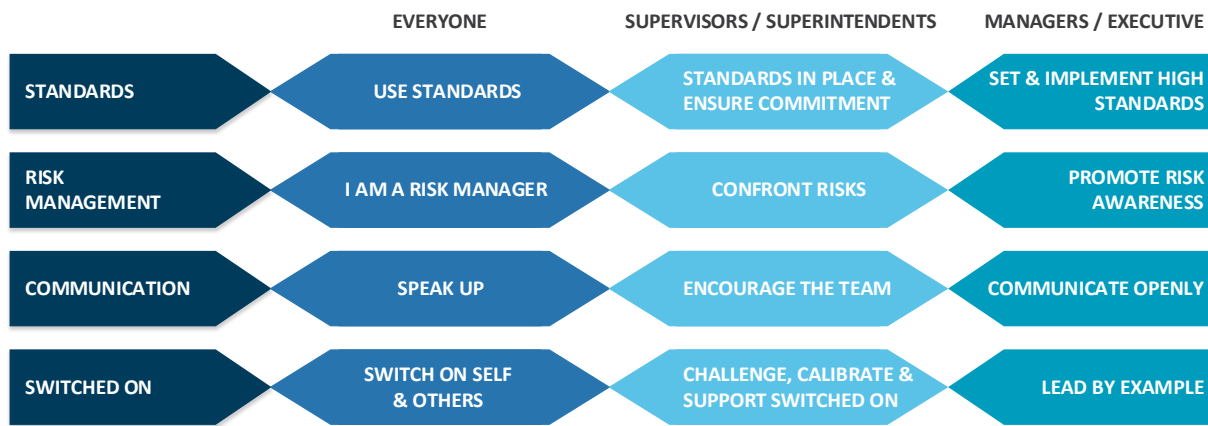


Figure 1: Schematic of the Safety Culture Framework

### 3.2 Everyone’s behaviour

The following table provides examples of the expected behaviours of all Workers and the behaviours that should be avoided. All Workers must strive to exhibit the Above the Line behaviours at all times.

EVERYONE’S BEHAVIOURS		
	I WILL...	I WILL NOT...
<b>Use standards</b>	Learn the rules and procedures that apply to me in my job	Ignore rules and procedures
	Follow rules and use the right procedure for the job	Disregard the consequences of not following a rule or Procedure
	Inform my Supervisor of impractical rules and procedures	Fail to reassess the job when conditions or the job changes
	Only complete tasks that I am competent in	Complete tasks that I do not hold the correct competency in
<b>I am a Risk manager</b>	Stay vigilant and be ‘Switched On’	Assume someone else is accountable for making the job safe

EVERYONE'S BEHAVIOURS		
	I WILL...	I WILL NOT...
	Ask 'what could go wrong?' and solve the problems	Fail to concentrate on what I am doing
	Conduct a risk assessment and ensure I am 'Safe to Start'	Assume we are 'Safe to Start'
	Check and verify my own understanding and never assume	Focus only on my task and ignore what is going on around me
	Appropriately control all identified risks	Fail to act on identified hazards
<b>Speak up</b>	Have <i>Courageous Conversations</i> with my colleagues at the time	Walk past at risk behaviour or unsafe conditions
	Listen to others' views and concerns respectfully and be sure we are all 'Safe to Start'	Say there is a problem without offering help to provide a solution
	Intervene when I see at risk behaviours or unsafe conditions	Undermine team discussions by going <i>Below the Line</i>
	Express concerns to my supervisor, including when I am unfit to work for any reason	Work when fatigued, unwell or otherwise unfit
	Ask questions to gain clarification	React negatively when challenged or when others check my work
	Report all incidents, near misses and hazards and ask for investigation outputs	Be a 'yes' person when I mean 'no'
<b>Switch on self and others</b>	Recognise others for working safely	Neglect to involve relevant stakeholders to problem solve
	Contribute to team discussions and meetings	Allow myself to be easily led and not have a ' <i>Courageous Conversation</i> '
	Contribute to incident investigations	Cut corners
	Promote health, safety and environment and participate in health, safety and environment initiatives	Avoid taking ownership of health, safety and environment issues

EVERYONE'S BEHAVIOURS	
I WILL...	I WILL NOT...
Share my own health, safety and environment knowledge	Keep concerns to myself

### 3.3 Supervisor / Superintendent behaviours

The following table provides examples of the expected behaviours of all Supervisors and Superintendents and the behaviours that should be avoided. All Supervisors and Superintendents must strive to exhibit the additional Above the line Behaviours expected of these roles at all times.

LEADER / SUPERVISOR / SUPERINTENDENT BEHAVIOURS		
I WILL...	I WILL NOT...	
<b>Standards in place and ensure commitment</b>	Inspect the worksite regularly to ensure compliance	Ignore, or work around, things that aren't working
	Expect compliance to health, safety and environment rules and Procedures at all times	Turn a blind eye to at risk behaviour
	Show through my actions that production does not override safety and environment	Encourage or reward behaviours that prioritise production over safety and environment
	Ensure team members have adequate competence, experience and training for the task in hand	Fail to fully consider the implications of not following Procedures
<b>Confront risks</b>	Be a <i>Risk Manager</i> and address health, safety and environment concerns that are raised	Make or support decisions that deviate from health, safety and environment procedures without due process and authorisation
	Take time to ensure the team understand the task and have the appropriate resources to safely complete	Direct work to occur without the appropriate planning in place
	Coach the team to ensure they are adequately identifying, assessing and controlling the risks	Focus only on safety, with less appreciation of occupational health or environmental concern
	Remind the team to reassess the job when conditions or the job changes	Place time pressures on my team to rush the job
	Work with the team to ensure they understand their health, safety and environment responsibilities	Ignore my team and their proposals for improvement

LEADER / SUPERVISOR / SUPERINTENDENT BEHAVIOURS		
	I WILL...	I WILL NOT...
	Promote reporting and investigation of incidents, near misses and hazards	Fail to listen and act on reported incidents, near misses and hazards
<b>Encourage the team</b>	Encourage the team to participate fully in team discussions	Embarrass or put other people down
	Recognise and reward good individual and team health, safety and environment performance/ improvements	Undermine the organisations health, safety and environment message or prevent it reaching the team
	Have <i>Courageous Conversations</i> and deal firmly and fairly with poor behaviour	Neglect to address poor behaviour and avoid tough or unpopular decisions
	Act on health, safety and environment concerns promptly, seeking management support where necessary	Apply discipline inconsistently or unfairly
<b>Challenge, calibrate and support Switch On</b>	Initiate team discussions about health, safety and environment	Fail to act when health, safety and environment concerns are raised
	Share lessons learnt with the team	Give insufficient support to health, safety and environment initiatives, preventing the message getting through to the team
	Support, coach and involve team members in implementing health, safety and environment improvements	Overload the team and fail to recognise excessive work pressures

### 3.4 Manager / Executive Leadership Team behaviours

The following table provides examples of the expected behaviours of all Managers and the Executive Leadership Team and the behaviours that should be avoided. All Managers and the Executive Leadership Team must strive to exhibit the additional Above the Line behaviours expected of these roles at all times. Managers and the Executive Leadership Team should also ensure:

- (a) Above the Line behaviours are supported, promoted and understood within their area;
- (b) Elements of the Safety Culture Framework and Above the Line behaviours are implemented within their teams; and
- (c) Application of the Safety Culture Framework and Above the Line/Below the Line behaviours is monitored and reviewed.

MANAGER / EXECUTIVE BEHAVIOURS		
	I WILL...	I WILL NOT...
<b>Set and implement high standards</b>	Explain health, safety and environment expectations to the workforce	Fail to plan how to achieve desired health, safety and environment performance
	Address significant health, safety and environment issues without delay	Tolerate variable and inconsistent health, safety and environmental standards
	Emphasise that production never compromises safety and environment	Allow short-term production pressures to win over safety and environment
	Recognise and reward positive health, safety and environment behaviours and performance	Treat serious incidents as just statistics
	Address poor health, safety and environment behaviours and performance fairly and consistently	Wait for known problems and accept repeat incidents
<b>Promote risk awareness</b>	Ensure effective reporting systems exist for people to raise concerns	Fail to see new ideas to support health, safety and environmental improvement
	Verify that organisation and technical changes are subject to risk assessment	Approve change without appropriate health, safety and environment consideration
	Actively encourage and support ideas to improve performance	Show more concern about statistics than people
	Verify that health, safety and environment management system controls are effective and complied with	Downplay or deny warning signs
	Ensure adequate resources, training and time for health, safety and environment are provided	Stop looking for higher standards of work
<b>Communicate openly</b>	Talk face to face with the workforce about health, safety and environment concerns	Fail to visit site or spend time in the work area regularly
	Communicate health, safety and environment messages with integrity in a simple and direct manner	Wait for others to take the lead on communication
	Listen to and act on health, safety and environment concerns raised by the workforce	Create unnecessary procedures, rather than fixing the underlying problem



MANAGER / EXECUTIVE BEHAVIOURS		
	I WILL...	I WILL NOT...
	Provide prompt, honest feedback on health, safety and environment concerns raised by the workforce	Avoid the 'Courageous Conversation' and tough communication
Lead by example	Ensure adequate resources and training are available	Fail to attend or delegate attendance at health, safety and environment activities without due cause
	Encourage and support ideas that improve health, safety and environment culture and performance	Commit with words but fail to take visible action / be slow to act
	Take personal action to improve health, safety and environmental performance, showing enthusiasm, decisiveness and support	Give low priority to the development and maintenance of workforce competence
	Seek new ways to widen workforce involvement	Blindly follow inadequate processes

### 3.5 Management of behaviour

Safety behaviours can be classified as being at or above expectation (Above the Line) or below expectation (Below the Line). At or above expected behaviour is to be acknowledged for the contribution it is making to building and sustaining the desired Safety Culture. Below expected behaviour needs to be challenged and corrected to instil a positive Safety Culture and allow for coaching, learning and continual improvement.

Where behavioural concerns are identified, these are to be investigated and managed in accordance with the Managing Unsatisfactory Performance Specification and Managing Discipline Specification.

## 4 Appendices

### 4.1 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:

Type	Legislation/regulation
State Acts	<i>Work Health and Safety Act 2011 (Qld)</i>
	<i>Work Health and Safety Regulation 2011 (Qld)</i>

(b) **Gladstone Ports Corporation documents**

The following documents relate to this Procedure:

Type	Document number and title
<b>Tier 1: Policy</b>	#365624 Safety Policy
<b>Tier 2: Standard/Strategy</b>	#854303 Safety Management Framework Standard
<b>Tier 3: Specification/ Procedure/Plan</b>	#1529449 Safety Leadership Procedure  #1463859 Managing Unsatisfactory Performance Specification  #960456 Managing Discipline Specification
<b>Tier 4: Instruction/Form/ Template/Checklist</b>	#1621179 Corporate Glossary Instruction
<b>Other</b>	N/A

## 4.2 Appendix 2 – Revision history

Revision date	Revision description	Author	Endorsed by	Approved by
09/06/2020	Original document creation	Tony Young, Safety Manager	Rowen Winsor, People Community and Sustainability General Manager	Rowen Winsor, People Community and Sustainability General Manager
04/08/2020	Legal review by HSF (minor formatting changes accepted). No material change to context or intent.	Tony Young, Safety Manager	Rowen Winsor, People Community and Sustainability General Manager	Tony Young, Safety Manager
28/04/2021	Minor amendments to wording including referencing to risk manager, health and environment.	Kirsty Iszlaub, Safety & Training Specialist – Systems	Tony Young, Safety & Training Manager	Rowen Winsor, Executive General Manager People & Community

Revision date	Revision description	Author	Endorsed by	Approved by
16/05/2024	Administrative changes only as part of scheduled review.	Kirsty Iszlaub, S&E Systems Lead	Tony Young, Safety Manager	Richard Haward, EGM Safety & ESG