ALLPRO®
ECO-FRIENDLY SOLUTIONS

SAFETY PROCEDURES MANUAL

VERSION 2023

A DIVISION OF THE MICHALIS GROUP PTY LTD
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Introduction

Work Health & Safety (WHS) involves the assessment and mitigation of risks that may impact the health, safety or welfare of those in our workplace and may include workers, customers, visitors, contractors, volunteers and others at our place of work.

All-Pro is required by law to meet WHS obligations, as far as is reasonably practicable.

PCBU – Definition

A 'person conducting a business or undertaking' (PCBU) is a broad term used throughout work health and safety legislation to describe all forms of modern working arrangements, which are commonly referred to as business. All-Pro as an employer is a PCBU.

Obligations upon All-Pro (PCBU) require specific processes and procedures to ensure that our work environment is free of health and safety issues.

Primary Duty of Care

All-Pro as a PCBU has the primary responsibility for health and safety of workers and others influenced by our systems of work.

The All-Pro WHS Policy outlines our commitment to ensuring a safe place of work and clearly states our overall WHS objectives. Further, All-Pro is committed to continuous improvement procedures to improve products, services and processes.

Workers – Definition

The definition of a 'Worker' is a person who carries out work in any capacity for a PCBU.

Workers – Duty of Care

Workers also have a duty of care and must ensure that they take reasonable care for the workers own health and safety, and for the health and safety of others, while at work. Workers must follow reasonable directions given by, or on behalf of, the PCBU on issues related to health and safety.

Legislation

NSW Work Health & Safety Act 2011
NSW Work Health & Safety Regulation 2017 and Relevant Codes of Practice
NSW Compliance Administration – SafeWork www.safework.nsw.gov.au
QLD Work Health & Safety Act 2011
QLD Work Health & Safety Regulation 2011 and Relevant Codes of Practice
QLD Compliance Administration - WorkCover Queensland www.worksafe.qld.gov.au

ALL PRO
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Work Health & Safety Policy

March 2023

ALL-PRO is committed to providing a healthy and safe workplace for all employees, sub-contractors and visitors. Pursuant to the *Work, Health & Safety (WHS) Act 2011*, and WHS Regulations, 2017(NSW) & Work, Health & Safety(WHS) Act 2011 and WHS Regulations, 2017(QLD)

Resources will be made available to comply with the current legislation and standards to protect the Health, Safety and Welfare of all employees and sub-contractors.

ALL-PRO will continue to address hazard control, accident prevention and training as priorities. The company considers Health, Safety & Welfare an integral part of production.

Health, Safety & Welfare is both an individual and shared responsibility for all employees, our goal is to remain incident and injury free. Acceptance of the following responsibilities are essential to the success of the policy.

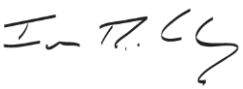
ALL-PRO management shall:

- Plan, develop, implement and monitor comprehensive Health, Safety & Welfare Programs
- Promote communication about Health, Safety & Welfare as a normal component of all aspects of work
- Take effective action to provide and maintain a healthy and safe workplace

Employees & Subcontractors shall share the responsibility to:

- Work in a healthy and safe manner
- Encourage others to work in a healthy and safe manner
- Cooperate with management in the support of promotion of Health, Safety & Welfare in the workplace
- Promptly report accidents, unsafe practices or conditions that become apparent and work with others to promote a safe workplace

Ian Barkley
Managing Director



Steven Robinson
General Manager

Inductions

Having a WHS Induction process shows a commitment by management at the highest level. It also provides a strong compliance lever under governance obligations of All-Pro.

The aim of the All-Pro induction process is to ensure that all workers and visitors understand the meaning and requirements in respect of WHS pertaining to our workplace and the policies, guidelines and reporting processes pursuant to the All-Pro WHS Management System.

The induction process will also involve a familiarisation with our workplace to highlight work areas, amenities, plant and equipment, stock, manufacturing processes, first aid, emergency procedures, and various reporting processes within your new work environment. Workers will also be guided through the company computer system where company forms and reference materials are stored and you will be introduced to fellow staff, supervisors and managers.

The induction process is always undertaken prior workers commencement of work and it forms part of the staff training process. A record of the induction process signed as acknowledgement by new workers is stored within company records.

The All-Pro inductions process provides an effective means of ensuring new workers:

- Understand Policies and Procedures
- Understand our business culture
- Understand WHS compliance in respect of their role and duties
- Understand performance standards of their job tasks or position
- Have a means of knowledge transfer
- Assist in cultural change
- Integrate easily into our workplace

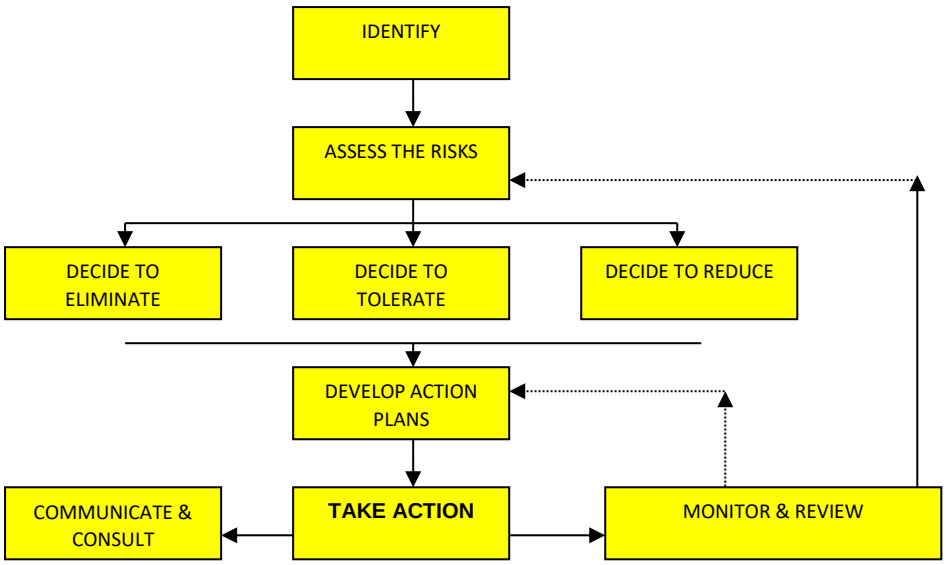
Information provided in the induction process includes:

- Identification of hazards and risks specific to our workplace
- Control measure for all identified risks in our workplace
- Site specific rules that must be complied with i.e. Wearing Personal Protective Equipment (PPE)
- Safety documents, policies and plans specific to the workplace
- Reporting processes, who to report incidents, near misses and hazards to and how to report them
- Incident, emergency and evacuation procedures
- Site map including entries and exits, loading and unloading areas, location of facilities, first aid and security requirements
- Emergency contact numbers and emergency personnel, first aid officers and emergency controllers

Risk Management

Risk management is simply a number of steps you can take to make the workplace safer:

- Identify a hazard
- Assess the risk
- Decide to eliminate, reduce or tolerate the risk
- Communicate, consult and take action
- Monitor and review



Hazard Identification

Hazards may be identified through, but not limited to, the following processes:

- Formal Risk Assessments;
- Formal hazard studies/investigations;
- Accident/Incident investigation;
- Job Hazard Analysis;
- Toolbox and prestart meetings, Step Back, Take 5's or other methods designed to facilitate hazard identification;
- Verbal or email notification of hazards by individual employees, contractors, sub-contractors or visitors;
- Customer site procedures, inductions and Safe Work Method Statements;
- Visual inspections of the workplace;
- Assessment of new plant, equipment, processes and substances prior to introduction
- New information that affects safety and health assessments such new legislation, regulations or standards, or customer procedures;
- Reports from external persons/bodies such as WorkSafe, circulars from professional organisations and WHS Consultants;

- Reviews of contractor proposed work methods and work practices; or
- Supplier product specifications and reviews.

All Hazards not previously identified will be subject to a Risk Assessment.

Hazard Categories

Hazard categories will include, but may not be limited to, the following:

Physical hazards, including:

- mechanical risks from machinery
- exposure to noise and vibration,
- inadequate lighting
- fire and explosion
- electricity
- heat
- cold
- poor housekeeping.

Hazardous substances, including:

- flammable solvents
- corrosives and poisons
- hazards relating to chemicals can arise from;
- ingestion
- contact or inhalation of vapours
- contact or inhalation of mists

Ergonomic hazards, concerned with the interaction of the person and machine and may concentrate on:

- manual handling
- tools and equipment
- work stations
- work process
- the workplace as a whole
- inadequate design considerations for both tools and equipment design can lead to injury.

Activities and tasks which may lead to injury, including but not limited to:

- Lifting or lowering loads;
- Carrying, stacking, pushing, pulling, rolling, sliding and wheeling of loads;
- Operating levers and other mechanical devices;
- Maintaining an unbalanced posture while performing these tasks.

Psychological hazards include:

- work schedule arrangements and shift work
- workload
- dealing with conflict, public
- harassment
- discrimination and
- low level constant noise

Assessment of Risk

Risk assessment involves analysing the inherent risk and taking into consideration the components of likelihood and consequence. The residual risk is determined by considering the likelihood and consequence following implementation of risk control options.

The level of risk associated with individual hazards is assessed against two criteria:

1. the probability that the identified situation will occur; and

Level	Description of Consequence
Insignificant (C1)	Near Hit with NO injury, but potential to cause injury Environmental incident with potential to damage the environment but with NO actual damage
Minor (C2)	Minor Injury requiring first aid treatment, cuts/bruises (no stitches required), minor burns Minor Environmental release. Impact immediately managed or contained
Moderate (C3)	Medical Treatment Injury recovery is likely, broken bones, stitches, burns requiring medical attention Environmental release with moderate detrimental effects requiring remedial action, reportable to authorities
Major (C4)	Lost Time Injury, hospitalisation, permanent disability, serious internal and/or head injuries Environmental non-permanent impact with major detrimental effects
Catastrophic (C5)	Fatality or permanent disability to ten or more people Environmental permanent & significant impact in significant areas

2. the likely outcome should that situation occur.

Level	Likelihood / Probability
Negligible (L1)	The event will occur only in exceptionally rare circumstances
Unlikely (L2)	The event may occur at some time but is unlikely to do so
Possible (L3)	The event could occur
Likely (L4)	The event will occur in most circumstances and is likely to do so
Almost certain (L5)	The event will almost certainly occur

Risk is identified using the following ranking system:

Likelihood / Probability	Consequence				
	Low (C1)	Minor (C2)	Moderate (C3)	Major (C4)	Critical (C5)
Rare (L1)	L2	L3	L4	M5	M6
Unlikely (L2)	L3	L4	M5	M6	H7
Possible (L3)	L4	M5	M6	H7	H8
Likely (L4)	M5	M6	H7	H8	E9
Almost certain (L5)	M6	H7	H8	E9	E10

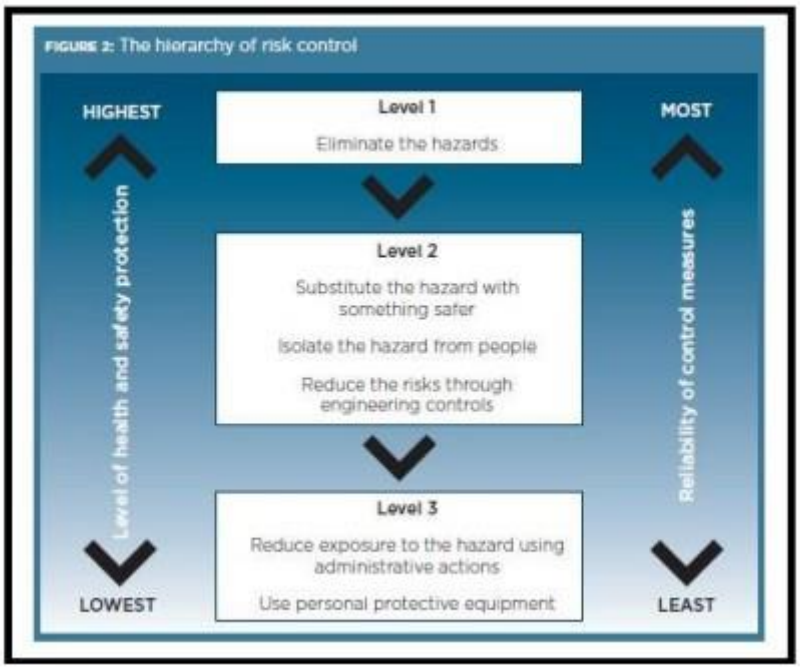
Risk Score	Risk Rating	Required Action
2-4	Low risk	Manage and Monitor by routine internal procedures.
5-6	Moderate risk	Specific monitoring or procedures to be implemented. Management responsibility to be specified and strategies implemented as part of day-to-day activities.
7-8	High risk	Immediate action to be implemented by Operations Manager and HSEQ Manager. GM to be notified
9-10	Extreme risk	Immediate action to be implemented; this level of risk needs detailed research and planning by Operations Manager and HSE Q manager. GM must be notified.

Hierarchy of Controls

The Organisation will comply with the relevant Work Health & Safety Acts, Work Health & Safety Regulation, Codes of Practice and Australian Standards for the management of risks and hazards in the workplace.

The hierarchy of risk control when implementing any risk control measures starting at level 1 and if not possible uses a combination of the remaining control methods:

The ways of controlling risks are ranked from the highest level of protection and reliability to the lowest as shown in Figure 2. This ranking is known as the hierarchy of risk control. The WHS Regulations require duty holders to work through this hierarchy when managing risk under the WHS Regulations.



The Organisation will always aim to eliminate a hazard, which is the most effective control. If this is not reasonably practicable, you should minimise the risk by working through the other alternatives in the hierarchy.

Level 1 Control Measures

The most effective control measure involves eliminating the hazard and associated risk. The best way to do this is by, firstly, not introducing the hazard in the workplace. For example, you can eliminate the risk of a fall from height by doing the work at ground level.

Eliminating hazards is often cheaper and more practical to achieve at the design or planning stage of a product, process or place used for work. In these early phases there is greater scope to design out hazards or incorporate risk control measures that are compatible with the original design and functional requirements. For example, a noisy machine could be designed and built to produce as little noise as possible which is more effective than providing workers with personal hearing protectors.

You can also eliminate risks by removing the hazard completely, for example, by removing trip hazards on the floor or disposing unwanted chemicals.

It may not be possible to eliminate a hazard if doing so means that you cannot make the end product or deliver the service. If you cannot eliminate the hazard, then eliminate as many of the risks associated with the hazard as possible.

Level 2 Control Measures

If it is not reasonably practicable to eliminate the hazards and associated risks, you should minimise the risks using one or more of the following approaches:

Substitute the hazard with something safer

For instance, replace solvent based paints with water based ones.

Isolate the hazard from people

This involves physically separating the source of harm from people by distance or using barriers. For instance, install guard rails around exposed edges and holes in floors, use remote control systems to operate machinery, store chemicals in a fume cabinet.

Use engineering controls

An engineering control is a control measure that is physical in nature, including a mechanical device or process. For instance, use mechanical devices such as trolleys or hoists to move heavy loads, place guards around moving parts of machinery, install residual current devices (electrical safety switches), set work rates on a production line to reduce fatigue.

Level 3 Control Measures

These control measures do not control the hazard at the source. They rely on human behaviour and supervision, and used on their own, tend to be least effective in minimising risks. Two approaches to reduce risk in this way are:

Use administrative controls

Administrative controls are work methods or procedures that are designed to minimise exposure to a hazard. For instance, develop procedures on how to operate machinery safely, limit exposure time to a hazardous task, use signs to warn people of a hazard.

Use personal protective equipment (PPE)

Examples of PPE include ear muffs, respirators, face masks, hard hats, gloves, aprons and protective eyewear. PPE limits exposure to the harmful effects of a hazard but only if workers wear and use the PPE correctly.

Administrative controls and PPE should only be used:

- when there are no other practical control measures available (as a last resort)
- as an interim measure until a more effective way of controlling the risk can be used, or
- to supplement higher level control measures (as a back-up).

Review of Control Measures

The Organisation will review and, as necessary revise control measures implemented under the Work Health & Safety Regulation 2011 and relevant Codes of Practice so as to maintain, so far as reasonably practicable, a work environment that is without risks to health and safety.

As part of the review process regular inspections will be conducted and recorded for reporting to all relevant persons

The Organisation will review and as necessary revise a control measure if;

- the control measure does not control the risk it was implemented to control so far as reasonably practicable when;
- the results of monitoring indicate the measure does not control the risk
- a notifiable incident occurs because of the risk
- before a change at the workplace that is likely to give rise to a new or different risk to health and safety
- a new relevant hazard is identified
- through consultation that a review is necessary
- the WHSR or workers requests a review
- the work environment changes and the controls in place may no longer be applicable to the risk or hazard

Documentation

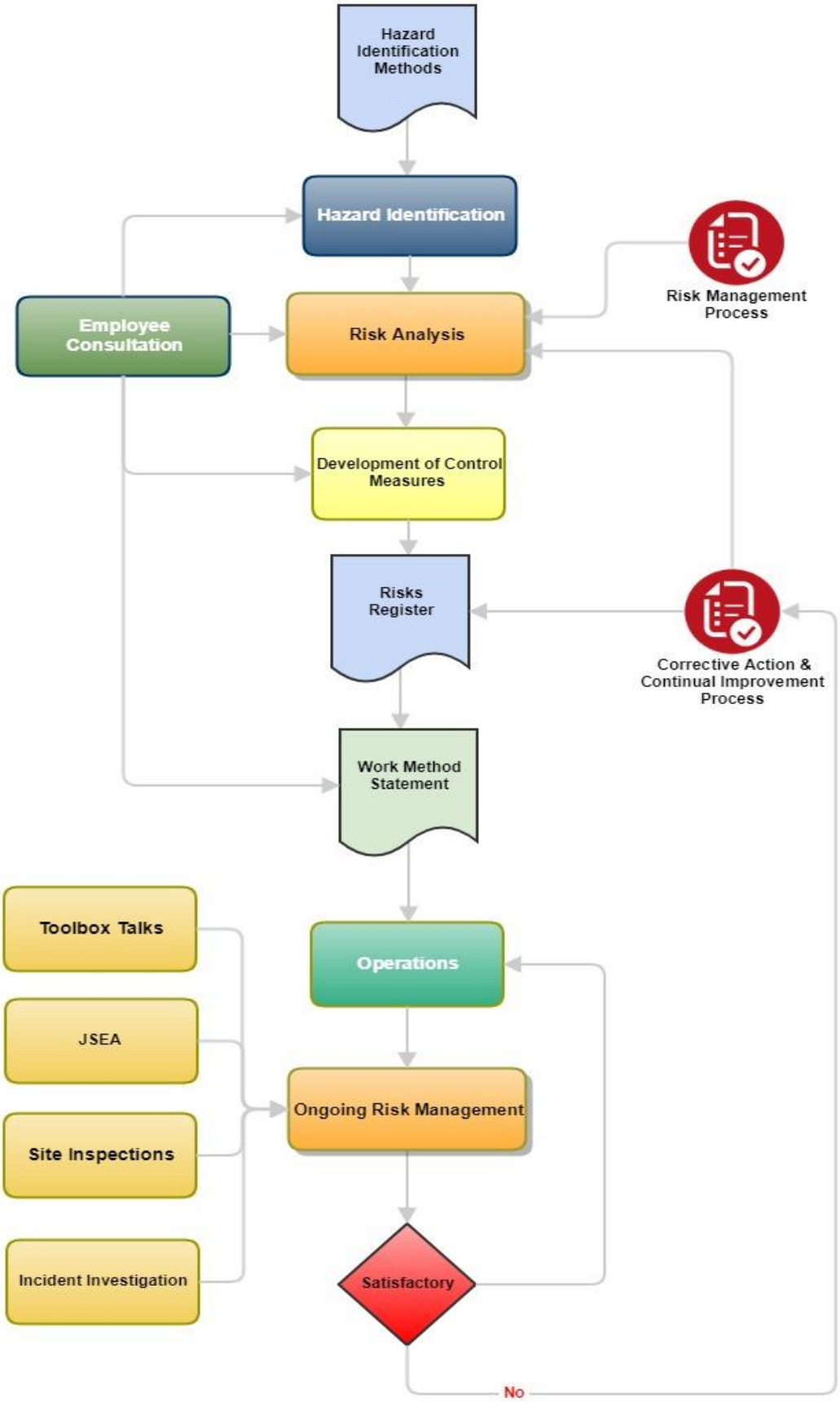
The Organisation identifies the potential hazards of the proposed work activities, assesses the risks involved and develops controls measures to eliminate, or minimize, the risks. The risk management process is carried out in consultation with employees. Risk Assessments are generically identified as EF26.

WORK METHOD STATEMENTS:

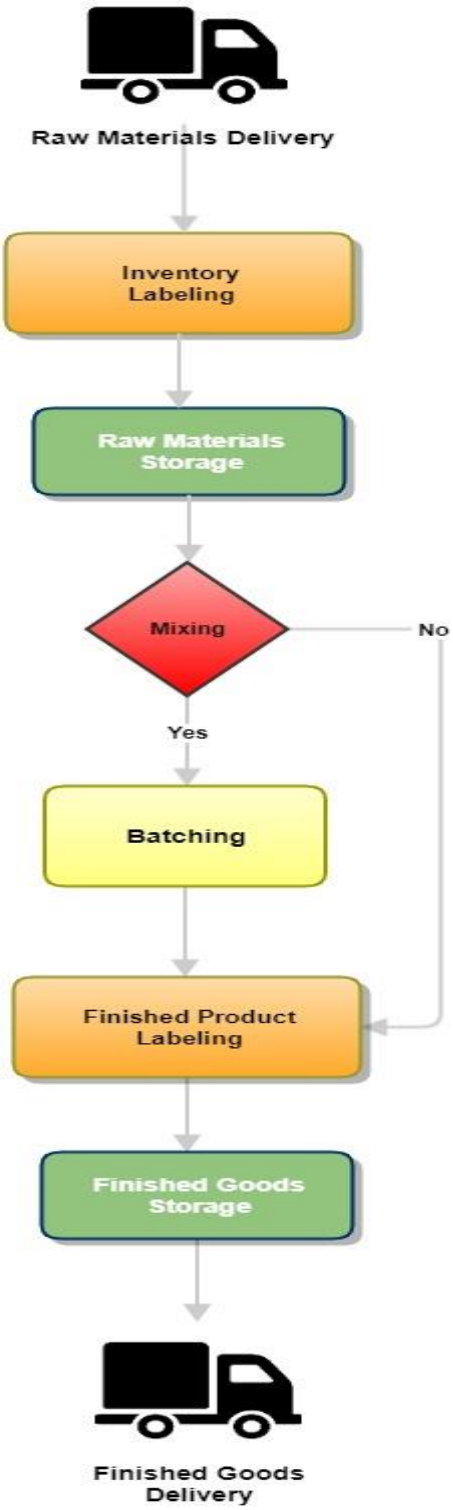
In some circumstances, the Organisation is required to operate under the client's documentation. In such circumstances, where documented methods or control methods differ, the more rigorous control method will be adopted. Where appropriate, these measures will be incorporated into the Organisation's documents. Risk Assessments, WHS Management Plans and Control Measures are reviewed annually.

DOCUMENT RELATIONSHIPS:

The relationship between the documents and the flow of risk related information is outlined in the diagram below.


Hazard Identification Methods
Hazard Identification
Risk Management Process
Employee Consultation
Risk Analysis
Development of Control Measures
Risks Register
Corrective Action & Continual Improvement Process
Work Method Statement
Toolbox Talks
Operations
JSEA
Ongoing Risk Management
Site Inspections
Incident Investigation
Satisfactory
No

Risk Assessment Factory Operations



Risk Assessment Factory Operations

Hazards Requiring Attention:	**0**
AS AT	**10 March 2023**
Next Review	**11 March 2024**
Total Hazards Recorded	**10**
Critical Risk Hazards	**0**
High Risk Hazards	**0**
Moderate Risk Hazards	**7**
Low Risk Hazards	**3**

Risk Matrix - Refer Procedure Hazard Identification

Probability	Low	Minor	Moderate	Major	Critical
Negligible	L2	L3	L4	M5	M6
Unlikely	L3	L4	M5	M6	H7
Possible	L4	M5	M6	H7	H8
Likely	M5	M6	H7	H8	E9
Almost Certain	M6	H7	H8	E9	E10

Factory Operations

Activity	Hazard	Probability	Consequence	Ranking	Control	Probability	Consequence	Ranking
Loading/Unloading	Forklift - Pedestrian/Vehicle Collision	4	4	**H8**	1. Designated Loading Areas 2. Forklift Opeerations as per Control Measures detailed in Risk Assessment	2	3	**M5**
Loading/Unloading	Spills/Contamination	3	4	**H7**	1. Inspection of packaging/containers as part of unloading process. 2. Spills Kits available.	3	2	**M5**
Loading/Unloading	Injuries as a result of Manual Handling	4	4	**H8**	Appropriate handling/lifting techniques in accordance with Work Method Statement	3	2	**M5**
Chemical Storage	Improper storage of hazardous chemicals leading to explosions, fires, burns and toxic gas releases, contamination.	3	4	**H7**	1. Inspection and labelling of of all imcoming goods. 2. Storage in accordance with the requirements identified in SDS.	2	3	**M5**
Chemical Storage	Incorrect labelling of chemicals leading to mixing.	3	4	**H7**	1. Inspection and labelling of of all imcoming goods.	2	2	**L4**
Chemical Batching	Hazardous Substances	5	4	**E9**	1. Formal training on Hazardous Chemical Handling. 2. Use of PPE as required by SDS	3	1	**L4**
Chemical Batching	Mixing of incompatible substances.	3	4	**H7**	1. Effective cleaning of equipment. 2. Documented chemical recipies.	3	2	**M5**
Chemical Batching	Equipment Malfunction	3	4	**H7**	1. Regular equipment maintenance by qualified persons.	2	2	**L4**
Chemical Batching	Chemical Spills	3	4	**H7**	1. Spill Kits in place 2. PPE Available in accordance with SDS 3. Factory area bunded.	3	2	**M5**
Emergency Situations	Fire, Explosion, Contamination	3	5	**H8**	1. Effective Emergency Response Plan in place. 2. Emergency Plan regularly rehearsed.	3	3	**M6**

Hazardous Chemicals (Hazchem)

Hazardous chemicals (Hazchem) have the potential to harm human health. They are substances, mixtures and articles used in the workplace (including by-products generated by processes in the workplace) that can be classified according to their chemical hazard and satisfies the criteria of one or more Globally Harmonised System of Classification and Labelling of Chemicals (GHS) hazard classes, including a classification in Schedule 6 of the WHS Regulations. They can pose a significant risk to health and safety if not managed correctly. They may have health hazards, physical hazards or both.

Examples of chemicals that can cause adverse health effects include:

- Toxic chemicals
- Chemicals that cause skin damage.
- Carcinogens.

Examples of chemicals that can immediately injure people or damage property include:

- Flammable liquids.
- Compressed gasses.
- Explosives.

Hazardous Chemicals provide a real danger at All-Pro given the nature of our workplace. It is imperative that they are handled with safety and in accordance with their GHS label, relative Safety Data Sheet (SDS) and workplace chemical handling training.

Dangerous Goods (DG's)

Dangerous Goods (DGs) is the name given to the group of chemicals or articles (goods) that are classified as dangerous for transport by road, rail, air or sea. The DG classification systems focus on goods with predominately acute hazards to safety, the environment or the road or rail transport vehicle on the basis of immediate physical or chemical effects such as fire, explosion, corrosion, oxidisation, spontaneous combustion and poisoning. They may be solids, liquids, pure substances or mixtures.

Most substances and mixtures that are dangerous goods under the ADG Code are hazardous chemicals. There are exceptions but most appropriately at All-Pro they relate to Class 9 (Miscellaneous) dangerous goods.

At our workplaces DGs are handled and stored daily. They must be handled safely and in accordance with safety instructions contained in their labels and Safety Data Sheets (SDS) and in line with All-Pro processes and procedures and ADG Code when prepared for:

INTERACTIONS BETWEEN HAZCHEMS AND DGs:

Many chemicals are both Hazchems under the WHS Regulations and DGs under the Transport Regulation, particularly those with acute physical hazards. Such chemicals need to comply with the GHS labelling requirements.

GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS):

The GHS is used internationally to standardise and harmonise the classification and labelling of chemicals. It was introduced in Australia from 1 January 2017 and revised as GHS 7 from 1 January 2023. Hazardous chemical products (i.e. classified as a hazardous chemical under the Work Health and Safety (WHS) legislation) that are being imported or manufactured must be labelled under the GHS unless a specific exemption applies. Regardless of any labelling exemptions, all hazardous chemical products must have a current Safety Data Sheet (SDS) that reflects GHS information.

HAZARDOUS CHEMICAL LABELS

Labels on hazardous chemicals identify the product and hazards and give instructions on how to use them safely. They provide information on safety controls needed in the workplace.

All-Pro as a manufacturer and importer of hazardous chemicals, must:

- Ensure that all products are labelled correctly so that workers, customers and others using them know the hazards.
- Prepare the labels in the format identified in the GHS. (Note: The changes introduced via the GHS include simpler hazard and precautionary statements).

Labels for workplace hazardous chemicals must be prepared in accordance with the model Code of Practice: Labelling of Workplace Hazardous Chemicals and model: WHS Regulations.

A label for a workplace chemical may include a mixture of GHS pictograms and ADG class labels.

Management at All-Pro will ensure that all chemicals are packed in a container that has a label written in English that includes:

- The product identifier.
- The name, Australian address and business telephone number of the manufacturer or importer.
- The identity and proportion of each ingredient – as per Schedule 8 to the model: WHS Regulations.
- Any hazard pictogram consistent with the correct classification of the chemical.
- Any hazard statement, signal word and precautionary statement consistent with the correct classification of the chemical.
- Any information about the hazards, first aid and emergency procedures relevant to the chemical, which are not included in the hazard statement or precautionary statement.
- An expiry date, if applicable.

The label may include an emergency phone number for specific poisons or treatment advice.

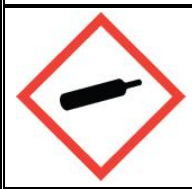
The label should be clearly legible and firmly affixed to the container; it shouldn't be obscured or in a spot where it could be removed, for example on the lid.

Labels should be reviewed periodically in order to keep them current, for example when:

- A change in the formulation or ingredients changes the chemical's hazardous properties.
- New information on the hazards of the product or any of its ingredients becomes available.
- The classification of a hazardous chemical changes.

- The label should also be reviewed alongside the Safety Data Sheet (SDS) which must be reviewed every 5 years.

GHS HAZARD PICTOGRAMS:

 Severe health hazards	 Health hazards	 Acute toxicity
 Explosive	 Flammable	 Oxidising
 Corrosive	 Gases under pressure	 Environmental hazard

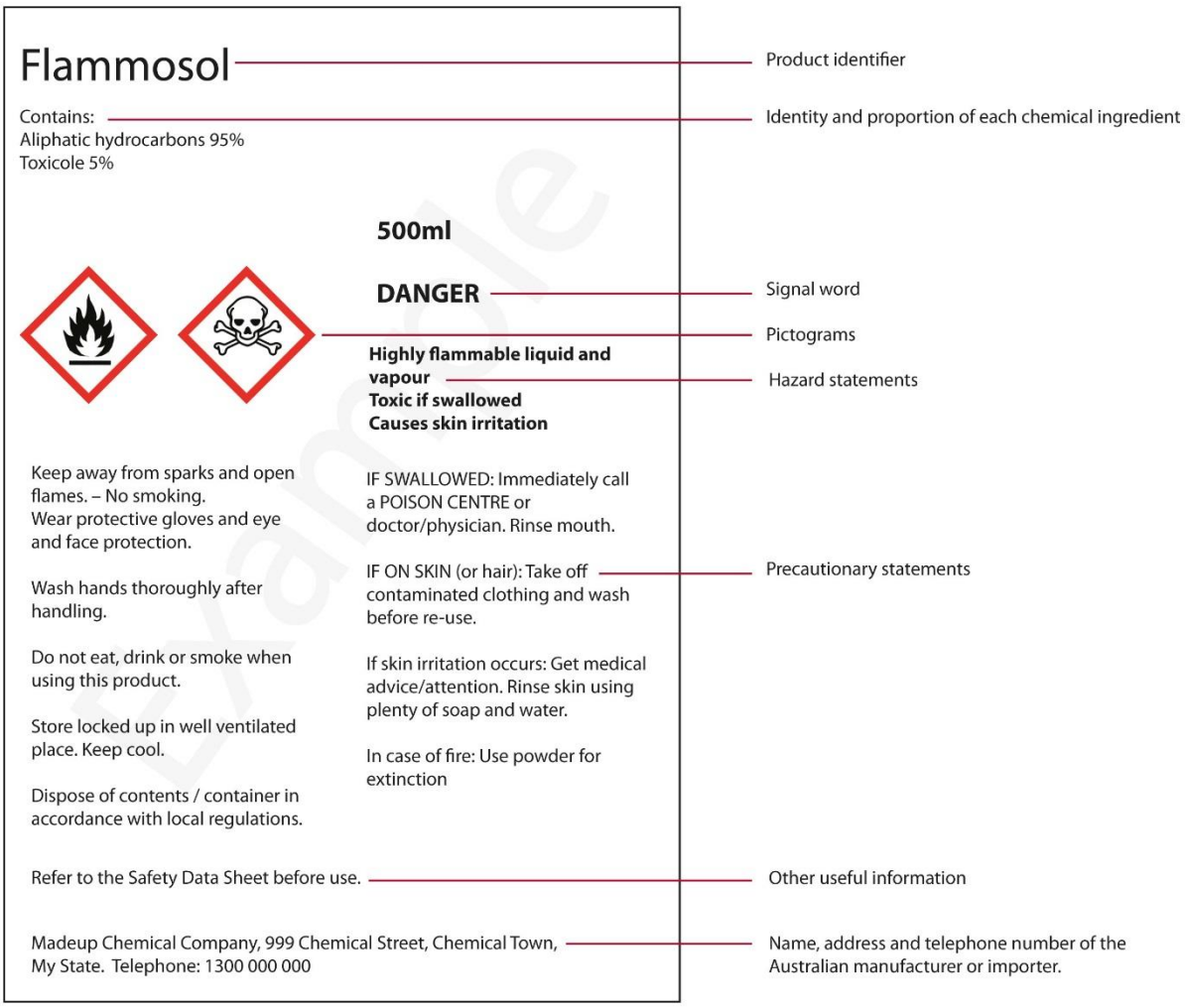
DANGEROUS GOODS CLASS LABELS:

The WHS Regulations allow manufacturers and importers to continue to use dangerous goods class labels on containers for workplace hazardous chemicals. Dangerous goods class labels are those pictograms that are used on dangerous goods containers to meet transport requirements under the Australian Code for the transport of dangerous goods by road or rail (ADG) Code. Some examples of dangerous goods class labels are shown below.

 Flammable liquid	 Spontaneously combustible	 Substances which, in contact with water, emit flammable gases	 Oxidising substances	 Corrosive

WHAT DOES A HAZARDOUS CHEMICAL LABEL LOOK LIKE?

The following is an example of a label you might see when a manufacturer moves to the new labelling system.



SAFETY DATA SHEETS (SDS)

In addition to labels, Safety Data Sheets (SDS) previously known as Material Safety Data Sheets (MSDS) provide information on the properties of hazardous chemicals, how they affect health and safety in the workplace and how to manage the hazardous chemicals in the workplace in respect of handling, storage, use and disposal. They provide information on the properties of the chemical as well as emergency response measures and environmental effects.

SDS SECTIONS AND REQUIREMENTS ARE:

1. **Identification: Product identifier and chemical entity.**
2. **Hazard(s) identification.**
3. **Composition and information on ingredients.**
4. **First aid measures.**
5. **Firefighting measures.**
6. **Accidental release measures.**
7. **Handling and storage, including how the chemical may be safely used.**
8. **Exposure controls and personal protection.**

9. **Physical and chemical properties.**
10. **Stability and reactivity.**
11. **Toxicological Information.**
12. **Ecological information.**
13. **Disposal considerations.**
14. **Transport information.**
15. **Regulatory information.**
16. **Any other relevant information.**

Management at All-Pro will ensure that SDSs are:

- Obtained from the manufacturer, importer or supplier of the hazardous.
- Allocated their correct raw chemical number (see Section 9 below).
- Current (within 5 years of the first supply of the hazardous chemical to the workplace or when the SDS is amended.)
- Created for all chemical products manufactured by All-Pro.
- Readily accessible to workers, emergency services personnel, medical professionals (where applicable) and to anyone likely to be exposed to the hazardous chemical.

SDS NUMBERING SYSTEM AT ALL-PRO

Section 1 of a SDS is titled “Identification” under which a sub-heading is shown as “Product Name” The product name shown is the primary name of the chemical however, a chemical may be known by several names and they are listed in Section 1 under the sub-heading “Other Names.” It is most apparent for the raw chemical products

An example of a raw chemical product used, stored and handled at our workplace known by its primary “Product Name” Cocamidopropyl Betaine.

The “Other Names” for that product are:

- Fatty acid amino alkyl betaine.
- TEGO BETAIN C 60.
- TEGO BETAIN F 50.
- TEGO BETAIN F KB 5.
- TEGO BETAIN ZF.

At All-Pro the actual name of the product for reference in our workplace is determined by management. It is the name common to our manufacturing formulas and for our raw products ordering system in MYOB.

To lessen confusion, in particular to workers who have limited knowledge of chemical names and entities, management at All-Pro introduced a numbering system whereby a raw chemical product stored, used and handled in our workplace is numbered for ease of identification. Raw chemical products may be substances such as liquids, powders, fragrances or dyes. Their respective number allocated is prefixed by the first 3 letters of their substance e.g: Cocamidopropyl Betaine is identified in our workplace as follows:

- **LIQ 012** Cocamidropyl.

A powder raw chemical product is similarly numbered e.g: Polyoxyethylene Glycol Ether 4000. It is numbered as:

- **PWD 065** Polyoxyethylene Glycol Ether 4000.

Note: That powder raw product is known by various “Other Names” such as:

- Ethylene Oxide.
- Homopolymer.
- Oligoethylene Glycol.
- POLY (OXY-1, 2- ETHANEDIYL).
- ALPHA-HYDRO-OMEGA-HYDROXY-.
- Polythylene Glycol.
- Sinopol Peg-4000.

The All-Pro numbering system allows workers to readily identify raw chemical products by their respective identification numbers which eliminates confusion created by multiple chemical names. It also provides for a greater response in emergency situations whereby incidents that require an immediate reference to a SDS in respect of safety precautions, Personal Protective Equipment (PPE) and first aid response etc. can be obtained from their SDS folders which hold the SDS in numerical order.

Formulas may change from time to time and that process may involve either the introduction of a new raw chemical product or the substitution of an existing raw chemical product.

The All-Pro numbering system for raw chemical products may require a new raw chemical number being allocated for that product. In some instances there may be a substitute product sourced which may be allocated the raw chemical product number of the product that it is replacing.

An example of that situation is when a safer or more environmentally friendly raw product is identified or is new in the market place.

SDS PROCEDURE FOR RAW CHEMICAL PRODUCTS

Management at All-Pro will ensure that the following procedure followed when sourcing raw chemical products:

* Identify a raw chemical product required for manufacturing.

* Source a supplier and forward a Purchase Order inclusive of the All-Pro allocated chemical number.

* Request a current GHS SDS for the raw chemical product.

***** When goods are received a check of the label is made to confirm the correct product has been received.

* Check to see if a SDS has been supplied with the goods and if not, contact the supplier and request a copy.

* Enter the SDS into the electronic Chemical Register in the company K:Drive under the allocated number or if it is an updated SDS or one obtained from a supplier for a substitute product, allocate a number and enter into the electronic Chemical Register.

* Place a hard copy of the SDS inclusive of that products allocated SDS number in the SDS folder stored in the factory, in numerical order.

* Attach a correct numeric label to the container of the chemical raw product as listed in the chemical register and as recorded on the SDS.

* Ensure that all SDS on hand are current and correctly numbered.

* Ensure all SDS must be updated at least every 5 years or when changes occur to their chemical composition.

SDS PROCEDURE FOR ALL-PRO MAUNFACTURED PRODUCTS

Management at All-Pro will ensure that:

- A SDS in the proper GHS format is created for all products manufactured and supplied by All-Pro.
- SDSs will be forwarded to customers on their first supply and/or when requested.
- SDSs will be supplied to any person who is likely to be affected by the chemical.
- SDSs will be updated at least every 5 years or when changes to chemical composition and formulas occur.
- SDSs will be stored electronically on the company K:Drive.
- SDSs will be readily available and easily accessed when required.
- Staff will be trained in the use and understanding of SDS contents.
- SDSs will reflect the label contents of All-Pro manufactured products with additional information as required as referenced by the model Code of Practice for the Preparation of Safety Data Sheets for Hazardous Chemicals.

STORAGE OF SAFETY DATA SHEETS (SDS):

Safety Data Sheets (SDS) are a key source of identification for chemicals stored and handled at All-Pro. They are readily available as a reference guide in emergency situations.

SDS HARD COPIES:

SDSs are stored both in hard copy form and electronically. Electronic copies are stored on the company K:Drive.

Hard Copies have been printed and placed into specifically marked SDSs folders in numerical order specific to the All-Pro chemical locations in which the subject chemical is stored.

SDS folders are readily identified by their colouring which is yellow with black diagonal stripes.

SDS folders are stored in specifically located red SDS holders which are wall mounted in the specific area where the hazardous chemicals are located.

ELECTRONIC COPIES:

SDSs are also stored in electronic form. They are stored on the company K:Drive in the folder titled Safety Data Sheets. Sub-folders have been created for respective liquids, powders, fragrances and DYES. They can be easily accessed if required.

A copy of all SDS are stored and aligned with the Chemical Register.

HAZARDOUS CHEMICAL REGISTER

All hazardous chemicals that are stored, handled or used at a workplace must be listed on the chemical register except where they are:

- In transit, or
- Consumer products.

The Chemical Register at All-Pro is stored on the company K:Drive and is regularly updated when new hazardous chemicals are introduced, substituted or deleted from stock holdings. In addition, the Chemical Register is updated at the expiry date for relevant Safety Data Sheets (SDS) for each hazardous chemical. All SDS must be updated every 5 years and it is the responsibility of management at All-Pro to ensure that all SDS's are obtained from suppliers at the time the chemical is introduced into the workplace or at the date of expiry.

The Chemical Register is required under the WHS Regulations and must be kept up to date to provide readily accessible information on all chemicals stored and handled in the workplace by all workers and anyone who is likely to be affected by the chemical at our place of work.

IN-TRANSIT HAZARDOUS CHEMICALS:

Hazardous chemicals are in-transit if they are not used in a workplace and are not kept there more than 5 consecutive days.

However, where a workplace frequently has in-transit hazardous chemicals present in significant quantities, these should be listed on the chemical register.

All-Pro holds in-transit hazardous chemicals on a constant basis and as such all hazardous chemicals regardless of being in-transit or not are listed on our company chemical register. An example of in transit chemicals would be when purchasing raw chemical products for customers that are delivered and stored on site before dispatch directly to that customer. The goods may only be stored overnight or a generally dispatch within a day or two of delivery.

CONSUMER PRODUCTS:

Consumer products are those that are packed primarily for use by a household consumer and are used in a way that is consistent with normal household use, for example:

- Laundry detergent packed in a 1kg container and used once a week by staff for washing work clothes is considered a consumer product and would not need to be included on the register. But a 30kg container of the same detergent used by a commercial laundering business is not considered to be a consumer product and must be on the register.

Consumer products also include hazardous chemicals used in an office, for example:

- Printer toner, or
- Whiteboard cleaner.

Chemicals that are hazardous do not need to be included on the register.

MAINTAINING THE CHEMICAL REGISTER:

The chemical register at All-Pro is maintained by the General Manager. Notwithstanding the current position, the chemical register can be maintained by any person irrespective of whether they hold any specific qualification or not, providing they have been deemed competent by management to carry out the task.

The person charged with the responsibility of maintaining the chemical register should have an understanding of:

- Obtaining and storage Safety Data Sheets both electronic and hard copies.
- What chemicals should be included on the register.
- How to read and classify chemicals according to their pictograms and SDS.
- GHS requirements.
- What storage requirements are needed for each chemical eg; segregation.
- Storage locations
- Quantities on hand and requirements for notification of dangerous goods.
- Safety Data Sheet changes and expiry dates
- Legislative changes and requirements.
- Records maintenance.

HAZARDOUS CHEMICAL MANIFEST

A manifest is required only where hazardous chemicals that are dangerous goods are present at the workplace and where their quantities exceed specific threshold amounts.

A manifest is different to a chemical register and is intended primarily for emergency services to use where they are required to respond to an emergency situation at the workplace.

The manifest is required to contain additional information about hazardous chemicals at the workplace than is a register, including the hazard classes and categories of the hazardous chemicals and details of the type, size and locations of containers present at the workplace.

The risks to health and safety associated with using, handling, manufacturing and storage of hazardous chemicals in our workplace must be appropriately managed.

HAZARDOUS CHEMICAL EMERGENCIES

A chemical emergency occurs when a hazardous chemical is has been released and the release has the potential for harming people's health. Chemical releases can be unintentional, as in the case of a workplace accident involving a chemical spill**.**

The nature of our business renders our workplace a high-risk environment. However, control measures have been put in place to protect our workers from the dangers of hazardous chemicals. Staff training in the use, handling, mixing, decanting and storage of hazardous chemicals allows for an understanding of safe procedures and effective management of the dangers present within our workplace and what is required to effectively respond to chemical and emergencies at All-Pro.

CHEMICAL SPILL MANAGEMENT

SPILL KITS:

Spill kits are used to control, contain and clean up spills within our workplace. They contain a range of absorbents and accessories that allow for the immediate containment and clean-up of liquid spills.

Spill kits are strategically located throughout our workplace and are identified during inductions, training and referenced in the Emergency Plan.

Items from the Spill Kits that have be used to contain a chemical spill **MUST** be replaced to ensure that the Spill Kits are fully stocked for emergency response situations.

All chemical spills must be attended to immediately, they must be assessed, contained and cleaned up in a prompt and safe manner and in accordance with the requirements of the Emergency Plan and Waste Management Plan.

Spill kits must be clearly labelled, visible and located in an easily accessible location. All workers must be aware of the location and trained in how to use the spill kits.

PERSONAL PROTECTION EQUIPMENT (PPE):

- Safety Boots
- Protective Eyewear
- Gloves
- Ear Muffs and Ear Plugs
- Splashback Aprons
- Respirators
- High Visibility Clothing

The above listed items are commonly used by workers at All-Pro. Additional PPE such as helmets, welding masks, sunscreen and other forms of protective clothing and equipment may be used from time to time within our workplace. They are all designed to protect the wearer's body from injury and infection.

The hazards addressed by PPE include physical, electrical, heat, chemicals, bio-hazards and airborne particulate matter etc.

A PPE storage area is located behind the work station in the factory. The Factory Manager is responsible for making available and issuing PPE and will as far as is reasonably practicable supervise and enforce the use of PPE where required. It is the responsibility of all workers to wear appropriate PPE where required. Further, if a worker is observed not to be wearing required PPE it is a responsibility of management or other workers who witness such issue to immediately inform the worker of the safety requirements for PPE and ensure that the worker clearly understands the need for PPE and responds to the needs as a matter of urgency.

All PPE must be maintained, repaired or replaced to minimise the risk to workers who use it. All workers must be given appropriate information, training and instruction in the use and maintenance of PPE.

Waste Management

All-Pro has a documented Waste Management Plan which is stored in electronic form on the company K:Drive and hard copies are located in the factory for ease of reference.

Environment

All-Pro is certified to AS/NZS ISO 14001:2016 – Environmental Management Systems – requirements. A documented Environmental Procedures guide is stored in electronic form on the company K:Drive and hard copies are located in the factory as a reference guide. Training in environmental awareness and responsibilities is provided to all staff.

Emergency Plan

All-Pro has a documented Emergency Plan which is identified to all staff during the induction process and used as a training resource.

The Emergency Plan is located in electronic form on the company K:Drive and hard copies have been printed and stored in the factory for ease of reference in the case of an emergency.

Emergency Muster Point

Emergency muster points have been designated. They are identified during workplace inductions and accessed during emergency evacuation drills.

Consultation

METHOD:

Consultation with workers and others who may be affected by any matter relating to work health and safety in the workplace is essential to promote the active participation of workers in WHS decisions, in accordance with the Work Health & Safety Act 2011.

The Organisation will consult regularly, developing partnerships between government, employers, workers and suppliers of plant and materials to ensure workplace health and safety.

Relevant information about activities will be shared with all involved and a reasonable opportunity will be given to express views and raise workplace health and safety issues. The most common method used for workplace consultation/communication is the Toolbox Meeting. Other methods that may be used include emails and notice boards.

If appointed the WHSR will be involved in the consultation process.

The Organisation will ensure that the views shared will form part of the decision making process when deciding on work methods and controls of risks and hazards. The controls that are adopted and put in place will be notified to all relevant persons and they will be required to sign off on the controls before commencement of works.

Consultation occurs in reference to, but not limited to, the following subjects / topics:

- hazard identification and risk assessment processes
- control measures for the management of hazards and risks
- proposed changes that may affect the health and safety of workers
- changes to the organisation's policies and procedures or work routines which may affect WHSE
- when establishing or changing procedures for resolving workplace health and safety, monitoring the health of workers, monitoring the conditions that may affect workers
- feedback on the results of internal and external audits and inspections
- training and information being provided to workers
- make up of and representation on relevant committees
- election of HSR and employee representatives if requested
- other work related matters
- all workplace consultation is recorded and occurs minimum twice per year.

Legal Compliance

RESPONSIBILITY:

The Directors ensure that staff comply with the requirements set forth in the permit conditions and laws and regulations associated with the operations of the Organisation.

The Management Representative monitors compliance with the permit conditions and laws and regulations and reports any non-compliance to management.

Staff are responsible for knowing and complying with the laws and regulations pertinent to their individual areas of responsibility as well as the requirements of the Organisation's Management System.

METHOD:

The Management Representative shall, on an annual basis, assess the business processes to ensure their regulatory compliance. The results of this review shall be recorded in the Compliance Log.

The results of this report will be sent to the Management Review Meeting for its update and action.

Managers & Supervisors are responsible for correcting all deficiencies identified through either internal or external inspections, internal audits, or as a result of new or modified regulations and permit conditions.

RECORDS:

Records shall be retained consistent with Procedure Records.

TRAINING

Management at All-Pro will ensure that all staff are properly instructed to understand their roles and responsibilities and that they are trained to do their work safely for the benefit of themselves and other is our place of work.

All staff will be trained to know all relevant health and safety information about their jobs, their workplace, the risks and how to identify and control the risks.

Management will ensure that all staff:

- Undertake induction and workplace safety training for new workers
- Train workers for the specific tasks they will have to perform
- Commit to appropriate supervision of workers
- Support regular refresher training
- Cultivate a strong safety culture within our workplace

INCIDENT INVESTIGATION

This procedure outlines the process and requirements for the reporting and investigation of all incidents, accidents and near miss situations within all of the Organisation's operations. The aim of this procedure is to ensure that:

- The Organisation investigates all incidents within a timely manner with a view towards the provision and maintenance of a suitable work environment;
- The Organisation meets all statutory and regulatory requirements.

INJURY DEFINITIONS:

LTI

Lost Time Injury – An occupational injury that results in one or more days away from work

RWDI

Restricted Work Day Injury – An occupational injury where as a result the employee was assigned to another task, less than full time or could not perform his normal tasks prior to the injury

MTC

Medical Treatment Case – A work related injury that results in a person receiving treatment from a qualified medical practitioner.

AI

All Injuries – Lost time and medical treatments combined

FAC

First Aid Case

ROOT CAUSE:

The root cause is an initiating cause of a causal chain which leads to the occurrence of an incident.

CORRECTIVE ACTION:

An action implemented in response to an incident.

PREVENTATIVE ACTION:

A change made to correct a systematic weakness that may not have resulted in an incident.

INCIDENTS:

Incidents are defined as any occurrence that leads to, or might have led to, injury or illness to people, danger to health and/or damage to property or the environment.

For the purpose of these procedures, the term 'incident' is used as an inclusive term for injuries/illnesses, accidents and near misses.

Incidents include but are not limited to the following situations:

- Injuries
- Work Health & Safety Incidents including Near Miss Incidents
- Environmental Incidents including radiation
- Procedural non conformance

NOTIFIABLE INCIDENTS:

A “notifiable incident” means:

- the death of a person, or
- a serious injury or illness of a person, or
- a dangerous incident.

REASONABLY PRACTICABLE:

Reasonably practicable is defined as having regard to the following in relation to ensuring health and safety:

- the likelihood of the hazard or risk concerned eventuating;
- the degree of harm that would result if the hazard or risk eventuated;
- what the person concerned knows, or ought to reasonably know, about the hazard or risk and any ways of eliminating or reducing the hazard or risk;
- the availability and suitability of ways to eliminate or reduce the hazard or risk; and
- the cost of eliminating or reducing the hazard or risk.

REPORTING:

All incidents are to be reported to the immediate supervisor at the earliest possible opportunities.

An Incident Report Form containing the details of the incident shall be completed and forwarded to the Factory Manager within one (1) working day

A record of all First Aid treatment is maintained in the First Aid Register

External reporting requirements are managed by the Management Representative.

INVESTIGATION:

All reported incidents are investigated within a reasonable timeframe which is determined by the severity of the incident.

Root causes are identified by completing the Root Cause Analysis section as per Procedure **Risk Opportunity Improvement**

Corrective Actions (**Reviews**) are determined to address each of the Root Causes identified during the analysis.

Investigations are completed within a reasonable timeframe which is determined by the severity of the incident.

The implementation and effectiveness of Corrective Actions are monitored.

ANALYSIS:

Incident statistics and trends are analysed on a regular basis.

INJURY CONSULTATION

DEFINTIONS:

Employee

An individual who works under a contract of employment. For the purpose of this procedure, it does not include contractors, sub-contractors, labour hire employees, volunteers, and employment schemes (work for dole, work experience, etc.)

First Aid

Treatment given for a minor injury that does not require further treatment by a dedicated medical professional i.e. doctor, hospital, ambulance.

Injury

A personal injury arising out of or in the course of employment, and includes:

- a disease contracted by an employee in the course of employment, where the employment was a contributing factor to the disease,
- or the aggravation, acceleration, exacerbation or deterioration of any disease where the employment was a contributing factor to the aggravation, acceleration, exacerbation or deterioration.

Injury Management

Activities and procedures that are undertaken or established achieving a timely, safe and durable return to work for employees following workplace injuries

Injury Management Plan – Insurer

A plan for coordinating and managing those aspects of injury management that concern the treatment, rehabilitation and retraining of an injured employee. An Injury Management Plan is written for all employees with significant injuries.

Medical Assessment/Treatment

Treatment provided by a dedicated medical professional i.e. doctor, hospital, ambulance

Notifiable Incidents (serious incident)

An incident that has resulted in fatality, a person placed on life support, loses consciousness, is trapped in machinery or confined space, has serious burns or an incident where there is an immediate threat to life.

Return to Work Plan

A written, agreed and time limited plan stating “suitable duties, restrictions, hours worked, supervision arrangements, regular monitor and review dates” including steps that will be taken to help the injured employee return to work.

Significant Injury

A significant injury is when an employee cannot undertake their usual duties for a continuous period of a particular number of days as determined by relevant state, territory, federal, industry legislation.

Suitable Employment (Duties)

Suitable Employment, in relation to a worker, means employment in work for which the worker is suited, having regard to the following:

- the nature of the worker’s incapacity and the pre-injury employment,

- the worker's age, education, skills and work experience,
- the details given in the medical certificate supplied by the worker,
- the provisions of any injury management plan for the worker,
- any suitable employment for which the worker has received rehabilitation training
- the length of time the worker has been seeking suitable employment,
- any other relevant circumstances

In the case of employment provided by the worker's employer, suitable employment includes:

- the number of hours each day or week that the worker performs work, or
- the range of duties the worker performs, is suitably increased in stages (in accordance with a rehabilitation plan or return to work plan or likewise), and by the employer at the workplace or elsewhere, or
- by any other person or body under arrangements made with the employer,

A worker is to be regarded as suitably employed if:

- the worker's employer provides the worker with, or the worker obtains, suitable employment, or
- the worker has been reinstated to the worker's former employment under the relevant Industrial Relations Act.

Injury Management Policy

All-Pro place the highest priority on the health safety and welfare of all its employees and is committed to preventing occupational injury and illness through providing a safe and healthy working environment.

All Pro shall ensure that an effective, systematic and equitable approach to injury management is developed, implemented, communicated and reviewed.

Early injury reporting and notification, accident investigation, preventative OHS risk management strategies and an active participatory approach by all involved will ensure the All Pro principal goals and objectives are achieved.

All Pro shall ensure, as far as is reasonably practical that commitment to effective Injury Management shall be demonstrated through;

- prevention of occupational injuries and illness through provision of a safe and healthy working environment
- allocation of necessary resources to the management of injury
- through consultation with employee representatives, develop a Return to Work Program
- ensuring early commencement of the injury management and return to work process with return to pre-injury duties the objective
- provision of suitable employment (duties) for injured employees
- ongoing consultation and support of injured employees to ensure effective return to work
- all workplace incidents are investigated with a 'no blame' philosophy

ROLES & RESPONSIBILITIES

DIRECTORS

- To achieve the objectives set out in this procedure and ensure the effective implementation of this procedure.
- Monitor and review the effectiveness of this procedure.
- Allocate necessary training and resources to ensure all employees have the necessary skills and knowledge to implement and adhere to this procedure.
- Notify the WHS Coordinator immediately of any injury requiring medical treatment other than simple first aid and as required by this element.
- Ensure line managers are aware of their responsibilities and procedures that they must follow to ensure effective and efficient injury management
- Implement, monitor and review the effectiveness of this element at site level
- Forward all injury management record files on site to the WHS Coordinator
- Discipline employees for breach of injury management procedures.

MANAGEMENT / SUPERVISION:

- Ensure that the injured employee receives the necessary first aid and/ or medical treatment, as appropriate for the injury/ illness. If in doubt, refer the injured employee for medical assessment.
- Immediately notify the All-Pro Managing Director and the WHS Coordinator of any employee who requires medical assessment or treatment.
- Ensure the injured employee completes Workers Compensation claim forms if employee attends medical assessment or treatment and forward claim forms to the WHS Coordinator within 12 hours of the injury.
- Conduct an Accident Investigation within 24 hours.
- Assist the WHS Coordinator with identification and assessment of potential suitable employment (duties) for consideration in the injured employee's return to work plan.
- Ensure that any training and/ or workplace modifications as agreed to as part of an injured employee's return to work plan is completed.
- Monitor and review the injured employee's return to work plan progress, in liaison with the WHS Coordinator.
- Ensure that their responsibilities in relation to injury management are adhered to at all times

WHS COORDINATOR:

- Establish the overall Corporate Injury Management System
- Notify insurers within 24 hours of injury being reported by Management / Supervision
- Notify SafeWork of 'notifiable events'

- Develop Return to Work Programs
- Liaise with the injured employee, nominated treating doctor, insurer, rehabilitation provider, specialists.
- Develop, implement and monitor individual return to work plans
- Provide support to the injured worker
- in case management and record keeping
- Initiate review of injured site employees in conjunction with All-Pro Manager on site
- Ensure ‘alternate duties’ are available where reasonably practical in consultation with project managers

EMPLOYEES:

- Take reasonable care and comply with the All-Pro Safety System, so as to prevent workplace injuries to themselves and others.
- Report all hazards, incidents and injuries immediately to Management / Supervision.
- Cooperate with All-Pro to enable it to meet its Injury Management obligations.
- Actively participate in any agreed individual return to work plan.
- Cooperate with reasonable workplace changes designed to assist the injury management of fellow employees.
- Attend any medical examination arranged by All-Pro or its insurer for the purpose of assessing or reviewing their condition.
- Ensure that the scheduling of any medical treatment appointments take into consideration the operational requirements of their department or work group and to liaise with their line manager regarding this. This may include attending treatment times outside of designated work hours.
- Ensure that their responsibilities in relation to injury management are adhered to at all times.

WORKERS COMPENSATION INSURANCE PROVIDERS:

When notified of an injury, the insurance company must:

- contact the worker, the employer, and the treating doctor within three days, and consult with all relevant parties to ensure that the worker receives necessary assistance to recover and return to work,
- commence provisional liability payments of weekly benefits and medical expenses within seven days (unless a reasonable excuse exists),
- develop an injury management plan for a worker with a significant injury, and
- co-operate with its obligations under the injury management plan.

The insurance company will have a 'reasonable excuse' to not start provisional liability payments if:

- there is not enough medical information to make the decision,
- the worker is unlikely to be considered a 'worker' under workers compensation legislation,
- the insurance company is unable to contact the worker, after repeated attempts,
- the worker refuses access to information,
- the injury is considered not work-related,
- the injury is not a significant injury (in these cases, decisions must be made within 21 days),
- the injury was notified after two months of the date of injury

GENERAL:

All-Pro Managers, Supervisors and workgroup employees shall adhere to the injury management process as per this procedure.

When an injury occurs:

- All injuries must be reported by the employee to their line manager immediately.
- Depending on the severity of the injury, the injured employee is to seek first aid and/ or medical treatment without delay
- The Management / Supervision shall immediately notify the All Pro Directors who in turn shall notify the WHS Coordinator (verbal) immediately of any employee who requires medical assessment or treatment (other than first aid).
- If the injured employee requires medical treatment the treating Doctor shall determine if the injured employee
    - is fit for pre-injury duties
    - is fit to for suitable duties
    - is unfit to work
- and will provide the injured employee with a SafeWork Medical Certificate.
- The injured employee must present the SafeWork Medical Certificate and any other documentation to their line manager.
- The line manager will provide the injured employee with Workers Compensation Employee claim form for completion.
- The SafeWork Medical Certificate and Employee claim forms and any other documentation are then to be forwarded to the WHS Coordinator within 12 hours of the injury.

In the case of an injured employee not being able to return to work to physically complete the forms, the line manager must notify the WHS Coordinator immediately and arrangements shall be put in place by the WHS Coordinator to contact the employee.

NOTIFIABLE INCIDENTS:

SafeWork requires the immediate reporting of notifiable events which include serious injury. In all cases SafeWork must be notified within 12 - 24 hours of the incident.

CLAIMS MANAGEMENT:

The insurer must be notified by All Pro within 24 hours of injury notification be employee where a compensation claim will be made by the injured employee.

The notification involves the lodgement of incident/ injury notification, SafeWork Medical Certificate and employee/ employer claim forms.
Provisional liability by the insurer will be provided within 7 days and complete liability being decided within 21 days. The injured employee will be notified by the insurer.
If liability for the claim is denied, the injured employee can dispute the decision: (Refer to Claims in Dispute).

Any accounts, receipts, medical certificates that directly relate to the injury should be forwarded to the WHS Coordinator immediately, to enable efficient payment and/ or reimbursement from the insurer and/ or All-Pro.

RETURN TO WORK PROGRAMMES:

All-Pro is committed to preventing injury and illness through the implementation of a systematic approach to the identification, assessment and control of hazards which may cause injuries and illness.

All Pro will ensure that the injury management process commences as soon as possible after an injury in a manner consistent with medical judgment and that early return to work by an injured worker is a normal practice and expectation. At no time shall any injured employee be disadvantaged as a result of their Return to Work management.

All Pro aim is to return injured employees to work according to the following preferred hierarchy of injury management goals.

1. Pre-injury duties/ pre-injury employer
2. Modified or reasonably adjusted duties/ pre-injury employer
3. Different duties/ same employer
4. Pre-injury duties/ different employer
5. Modified or reasonably adjusted duties/ different employer
6. Different duties/ different employer

THE RETURN TO WORK PROCESS:

The employer shall nominate a Medical Treating Doctor if the injury results in the employee being unable to perform their pre-injury duties for a continuous period of 4 days or more.

If the injury is minor and as determined by the medical assessment the injured employee will return to “pre-injury duties”.

If the injury is not deemed as ‘significant’ and the employee classified as “fit for suitable duties”, the WHS Coordinator shall consult with the injured employee and their supervisor to develop an individual Return to Work plan consistent with the medical limitations. This plan shall detail agreed outcome, duties, hours of work, restrictions, review dates and shall be signed by the injured employee, supervisor, WHS Coordinator and nominated Treating Doctor. No suitable duties shall commence until they have been agreed to by the Nominated Treating Doctor (if contactable and replies to requests).

If the injury is ‘significant’ the commencement of the development of an Injury Management Plan must be started within 3 days of notification by All Pro. This Injury Management Plan will be developed by the insurer and contain specific requirements for the employer, insurer and injured employee.

Injury management may not be necessary in all cases of work related injury. However, early assessment of the need for injury management is imperative. Initial injury management contact will be made within 3 days by the WHS Coordinator for all workers compensation claims.

Support will be provided to the injured employee, to monitor, review and effectively case manage including the provision of information and legislative rights and obligations during the return to work process.

The return to work process will follow the legislative requirements determined by the relevant state/ territory SafeWork body.

INVOLVING AN ACCREDITED REHABILITATION PROVIDER:

Rehabilitation Providers are multi-disciplined teams of health professionals whose services may be engaged to assist in the injury management of injured employees. Rehabilitation Providers need to be accredited by the relevant state/ territory SafeWork body.

Rehabilitation Providers services shall be engaged when the workplace injury management of an injured employee is complex and referrals shall be made as early as possible.

The right to referral of a Rehabilitation Provider may be made by an insurer, medical practitioner, and or employer.

The injured employee has the right to choose the Rehabilitation Provider.

PROVISION OF SUITABLE EMPLOYMENT:

Provision of suitable duties is an integral part of All Pro’s commitment to the Workplace Injury Management Program and an important aspect of helping the injured employee return to work in a safe and timely manner.

Suitable duties shall always be offered in accordance with relevant State Workers Compensation Act

Return to pre-injury duties following injury shall always be the initial objective.

In the allocation of suitable duties, consideration will firstly be given to suitable duties within the worker's usual workgroup.

This provision includes outside employees undertaking duties within the office should there be no other suitable duties within their usual work groups.

Restricted hours, modification of a workplace, change in duties or a combination of factors will be considered when developing an employee's rehabilitation program.

Suitable duties shall be documented (Return to Work Plan), clearly listing the duties to be performed, working hours, physical/ medical restrictions, dates and times of medical treatment and Plan review.

Suitable duties shall be time limited, monitored closely (informal and formal) and regularly reviewed and upgraded.

Appropriate training must be given to injured employees on selected duties if they are working in a new area;

Duties may be changed as part of the rehabilitation process. This will occur in consultation with the worker, the treating doctor, the appropriate supervisor, the WHS Coordinator and if required, the Rehabilitation Provider.

Conclusion of Injury Management

Workplace Injury Management will conclude when an injured employee:

- resumes all pre-injury duties and hours; or
- returns to full employment of pre- injury position, but with modified duties acceptable to the employee and their department; or
- withdraws from their injury management program, in which case the appropriate parties will be notified; or
- is considered by a medical or injury management professional as unlikely to gain any further benefit from continued injury management; or
- ceases to be employed by All Pro, in this case the injured employee's injury management needs will be assessed through the Workers Compensation Insurer, and an accredited rehabilitation provider if appropriate.

CONSULTATION OF EMPLOYEES:

Particular needs of workers who speak a language other than English shall be considered.
Employees will be informed of their rights and responsibilities with regards to AllPro Injury Management Policy and Return to Work Program through the following

- Employee Induction
- Ongoing Development and Training
- Awareness and Information pamphlets
- Display summary of "Return to Work Program" on relevant noticeboards

Dispute Resolution

Any conflict of interest or dispute should be resolved as quickly as possible in order to ensure effective injury management for the injured employee. It should be noted that All-Pro is committed to making all reasonable efforts within its capability to resolve any dispute.

In the event of a dispute over an individual injury management case, the dispute shall be handled as follows;

- The WHS Coordinator shall attempt to informally resolve the dispute by coordinating discussions with, as appropriate and where applicable, the injured employee, supervisor, manager, treating Doctor(s), Rehabilitation Provider.
- Should the dispute not be resolved, the matter may be referred to a SafeWork Injury Management Consultant to facilitate resolution regarding fitness for work and the suitability of duties offered to the injured employee; or to a SafeWork Approved Medical Specialist in relation to medical disputes regarding the employee's condition or fitness for employment.
- If the matter still remains unresolved, the issue should then be referred to the Workers Compensation Commission.

CLAIMS IN DISPUTE:

If the insurer decides to deny liability, the injured employee can dispute the decision through the Workers Compensation Commission.

CONFIDENTIALITY:

All-Pro shall ensure:

- SafeWork Confidentiality of Rehabilitation Information guidelines for employers are adhered to.
- All injury management information concerning an injured worker is confidential.
- All case management files shall be kept separate to personnel files and access shall be limited to those who have direct responsibility in coordinating, monitoring or providing return to work services to the injured worker, and those involved in providing clerical and administrative support. Access to information by relevant personnel shall be limited to information that is relevant to their area of responsibility for the injured employee.
- All records will be properly stored, secured and retained in line with SafeWork requirements.

References

All Pro Safety Management Plan
All Pro Risk Management Plan
All Pro WHS Policy
All Pro Emergency Plan
All Pro Environmental Management Plan
Managing the Risk of Hazardous Chemicals in the Workplace – Code of Practice