Purpose

The purpose of this document is to describe the process for managing Work Health and Safety (WHS) risks throughout the organisation’s operations in accordance with a risk management approach using the hierarchy of controls.

Scope

This operating procedure applies to all workers managing and controlling risks to maintain safe work practices at:

- Sydney Trains workplaces; and
- workplaces under the control of other organisations where Sydney Trains workers are required to work.

Out of Scope

This operating procedure does not apply to the following risk category.

- Hazardous Chemicals

Note:

Workplace includes a vehicle, vessel, aircraft or other mobile structure.

Source: WHS Act, 2011

Process flow

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Figure 1 Process flow for WHS risk management
Process Description

WHS risk management is the process of eliminating or controlling risks of identified hazards with the aim of providing safe and healthy conditions in the workplace for workers, customers and visitors.

The risk management process systematically addresses WHS risks by:

- identifying hazards;
- considering risks in terms of consequences and likelihood; and
- using risk-based decision making and allocation of resources

Managing WHS risks involves:

- identifying and reporting hazards;
- assessing risks where necessary;
- controlling risks; and
- monitoring and reviewing risks.

This system procedure outlines the roles and responsibilities of workers to manage work health and safety risks.

6.1: Manage risk categories

The Director Safety and Standards will identify the risk categories for the organisation, based on risk management principles, by reviewing previous incidents, the organisational risk register and legislative compliance requirements. Refer to SMS-06-OP-3027 06.1 Manage Risk Categories.

Each of the risk categories will have procedures and/or guides, tools and forms to support the identification and management of hazards and risks.

The 12 Sydney Trains Risk Categories are:

i. Construction Work  vii. Working at Heights
ii. Hazardous Chemicals  viii. Hot Work
iii. Hazardous Manual Tasks  ix. Confined Spaces
iv. Electrical Safety  x. Noise

Managers of Business Units, in consultation with Line Managers, will determine the key Safety Risk Categories that are applicable to the working environments in the business unit and the work activities to be undertaken.
6.1: (continued) When the relevant risk categories have been identified, refer to the relevant Operating Procedure to:

- identify hazards;
- assess risks;
- control risks; and
- monitor and review control measures.

The Operating Procedures relevant to the risk categories are:

- SMS-06-OP-3029 06.3 Manage Safety in Construction
- SMS-06-OP-3031 06.4 Manage Risks when Working with Hazardous Chemicals
- SMS-06-OP-3032 06.5 Manage Risks with Hazardous Manual Tasks
- SMS-06-OP-3033 06.6 Manage Risks when Working Around Electrical Equipment
- SMS-06-OP-3034 06.7 Manage Risks with Hazardous Materials
- SMS-06-OP-3035 06.8 Manage Risks with Plant and Equipment
- SMS-06-OP-3036 06.9 Manage Risks when Working at Heights
- SMS-06-OP-3037 06.10 Manage Risks with Confined Spaces
- SMS-06-OP-3038 06.11 Manage Risks with Noise
- SMS-06-OP-3039 06.12 Manage Risks with Hot Work
- SMS-06-OP-3040 06.13 Manage Risks in the Working Environment
- SMS-06-OP-3041 06.14 Manage Risks with Workplace Violence.

6.2: Identify hazards

Asset Managers and Line Managers will conduct hazard identification activities through a variety of methods including observations, hazard reports, inspections, workplace visits, safety engagements, audits and customer feedback. Workers and contractors must take immediate action to prevent injury when a hazard is identified.

Workers must report hazards not able to be immediately eliminated to the Line Manager using SHEM.

Line Managers must make sure that any hazard not immediately controlled is recorded using SHEM.

In some instances, Sydney Trains workers are required to work at workplaces not under the control of the organisation. In these cases, Line Managers / Project Managers will undertake a health and safety audit/inspection of that workplace and if necessary seek advice or assistance from a safety professional. Any hazard identified either as a result of the audit/inspection or subsequently by a worker at that location, will be reported to local management for resolution using that organisation’s procedures.
6.2: (continued)  
Review reported hazards

Line Managers will review all reported hazards recorded in SHEM to:

- see if the hazard is a new one or if it's a recurrence of an existing hazard;
- identify if there are any existing controls used to manage the hazard;
- check if the control measures are being implemented properly; and
- determine what action (including further risk assessment) is required, and initiate action as required.

6.3: Assess risks

Risk assessments will be conducted, in consultation with affected workers, based on the identified hazards to determine the likelihood of the risk eventuating and the degree of harm that would result if the risk eventuated.

Asset Managers and Line Managers will arrange for risk assessments to be conducted by a competent person using SHEM.

Note:

Line Managers and workers who facilitate WHS Risk Assessments are to be trained in relevant SHEM modules and SM04 SMS Introduction. Additional training requirements may be listed in specific WHS Risk Category Procedures and Guides.

Line Managers will make sure that the risks associated with hazards are assessed when:

- there is uncertainty about how a hazard may result in injury or illness;
- the work activity involves a number of different hazards and there is a lack of understanding about how the hazards may interact with each other to produce new or greater risks;
- changes at the workplace occur that may impact on the effectiveness of control measures; and
- the hazards relate to a workplace where workers are deployed at and the workplaces are not under the control of organisation.
Managers of business units may initiate a single WHS risk assessment for planned tasks, procedures and equipment used at more than one workplace, or by more than one work group for the above risk categories. This generic risk assessment may be distributed either electronically or posted on the intranet to avoid duplication.

Managers of business units may initiate a generic WHS risk assessment where:

- the title of the assessment matches the intended application;
- the scope of the assessment is consistent with the intended application;
- the assessment comprehensively addresses the hazards and risks associated with the intended application in the local workplace, and the risk rankings are appropriate; and
- listed controls are relevant and in place.

Where a risk assessment identifies the following risk categories:

- hazardous chemicals;
- hazardous manual tasks; or
- plant and equipment.

in addition to the generic WHS risk assessment; a specific risk assessment for the risk category identified may be required using the category risk assessment tools.

### Review risk assessments

Line Managers will review documented risk assessments used in workplaces under their control in consultation with affected workers:

- when a change is proposed to the task, equipment or substance addressed by the scope of the assessment;
- at least every three years;
- on completion of a WHS risk assessment in SHEM;
- as a result of incidents or investigation findings; and
- when the SMS or legislation changes and those changes have the potential to impact controls documented in a risk assessment.

### 6.4: Determine control measures

Following the completion of a risk assessment Line Managers will determine control measures to eliminate risks arising from WHS hazards. Where elimination is not reasonably practicable, Line Managers will determine measures to control the risk so far as is reasonably practicable (SFAIRP), by:

- consulting affected workers, including the relevant Health and Safety Representative (HSR) or other agreed consultative arrangements;
- following the requirements of the applicable operating procedure and/or guide (refer to SMS-07-OP-3085 SFAIRP Determination and
6.4: (continued) **Demonstration** for a description of the elements of SFAIRP);

- consulting the applicable Code of Practice, Australian Standards and manufacturers’ instructions including Safety Data Sheets, as required, to make sure controls comply with those requirements developing controls by applying the hierarchy of controls below:
  - eliminating the hazard altogether;
  - substituting the hazard with something that is of lower risk;
  - isolating the hazard from any person exposed to it;
  - implementing engineering controls;
  - minimising the risk by administrative controls (such as adopting Safe Work Method Statements or providing appropriate training, instruction or information);
  - using personal protective equipment; and
  - using a combination of controls, if necessary, to reduce a risk, SFAIRP.

- recording the proposed control measures against the relevant hazard in the risk assessment conducted in SHEM.

- consulting with management of those workplaces not under the control of Sydney Trains where workers are deployed to make sure control measures are developed and implemented to eliminate or where that is not possible to manage the risks associated with the hazards identified SFAIRP.

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**Note:**

Cost of control measures and the implementation of those controls should be considered so far as is reasonably practicable.

‘Reasonably practicable’, in relation to a duty to ensure health and safety, means that which is, or was at a particular time, reasonably able to be done in relation to ensuring health and safety, taking into account and weighing up all relevant matters including:

i) the likelihood of the hazard or the risk concerned occurring, and

ii) the degree of harm that might result from the hazard or the risk, and

iii) what the person concerned knows, or ought reasonably to know, about:

- the hazard or the risk, and
- ways of eliminating or minimising the risk, and

iv) the availability and suitability of ways to eliminate or minimise
the risk, and

v) after assessing the extent of the risk and the available ways of eliminating or minimising the risk, the cost associated with available ways of eliminating or minimising the risk, including whether the cost is grossly disproportionate to the risk.

6.4: (continued) Line Managers will train workers to conduct hazard identification:

- before using workplace or plant for the first time;
- before introducing changes to work practices, procedures, or the work environment e.g. tools, equipment;
- before introducing new substances to the workplace;
- before procuring new goods or works and services;
- when planning construction activities;
- when new or additional information relevant to the health or safety of workers becomes available;
- periodically, in accordance with SMS-16-SP-3076 Inspection, Testing, Calibration and Monitoring;
- by conducting Safety Induction training for all direct reports at the workplace before workers commence work to inform workers of their safety responsibilities;
- by consulting with workers about potential hazards and associated risks; and
- before commencing work at workplaces not under the control of the organisation.

6.5: Implement controls Line Managers will refer to the risk assessment in SHEM to determine what action is required and initiate the proposed action, as required. Refer to the operating procedure (as listed in step 6.1 in this document) for the relevant risk category for further information on implementing controls.

Adopt control measures from Australian Standards and Codes of Practice, where applicable.

Note:
Line Managers must consider whether the controls introduce any additional risks.
6.6 Monitor and review controls

Monitor control measures

Line Managers will monitor the control measures to determine if they are implemented properly and do not introduce new hazards or increase risks.

The Risk Explorer is a functionality in SHEM that contains information about identified WHS risks that require ongoing control.

Reviewing WHS Risks in SHEM

Line Managers will consult with HSRs/Safety Committees to review WHS risks using SHEM.

Line Managers will review WHS risks relevant to their area of responsibility using SHEM to:

- monitor WHS hazards, their risks and their controls;
- allocate and manage resources appropriately;
- provide information about risks and their controls to workers and other stakeholders (e.g. visitors);
- develop tailored site inspection checklists to make sure that controls are implemented and effective; and
- prepare an audit program or, when conducting site audits, to verify controls are implemented and effective.

As a minimum, Line Managers will review control measures in consultation with HSRs/Health and Safety Committees:

- at least every six months for B class risks and 12 months for C and D class risks;
- when the control measure is not effective in controlling the risk (e.g. following an incident or near miss);
- before a change at the workplace that is likely to give rise to a new or different health and safety risk that the control measure may not effectively control e.g. change to equipment, task or substances;
- if a new hazard or risk is identified;
- if the results of consultation indicate that a review is necessary;
- if a safety representative requests a review; and
- following changes in legislation.
## Responsibilities

**Director Safety and Standards**
- Identify the risk categories for the organisation, based on risk management principles, by reviewing previous incidents, the organisational risk register and legislative compliance requirements.

**Managers of Business Units**
- Determine the key safety risk categories applicable to the business unit; and
- Make sure risk assessments include assessment of risk controls.

**Asset Managers**
- Conduct hazard identification activities;
- Arrange for risk assessments to be conducted;
- Determine risk control measures; and
- Monitor and review risk control measures.

**Line Managers**
- Conduct review of WHS Risks relevant to their area of responsibility using SHEM;
- Conduct hazard identification activities at Sydney Trains workplaces and those controlled by other organisations where workers are required to work;
- Inform workers of identified hazards;
- Consult with relevant workers when undertaking risk assessments and determining controls;
- Assess the risk arising from hazards;
- Arrange Risk Assessments to be conducted, develop control measures using SHEM and implement appropriate safety actions where applicable;
- Log findings of reported hazard reviews;
- Document control measures using SHEM;
- Implement control measures;
- Conduct Safety Induction training;
- Train workers in correct work practices to reduce risks; and
- Monitor and review the effectiveness of control measures.

**Workers including Contractors**
- Implement immediate action to prevent injury when a hazard is identified; and
- Report hazards not immediately rectified to the Line Manager.
References
SMS-06-OP-3027 06.1 Manage Risk Categories
SMS-06-OP-3028 06.2 Report and Manage Hazards
SMS-06-OP-3033 06.6 Manage Risks when Working Around Electrical Equipment
SMS-06-OP-3034 06.7 Manage Risks with Hazardous Materials
SMS-06-OP-3036 06.9 Manage Risks when Working at Heights
SMS-06-OP-3037 06.10 Manage Risks with Confined Spaces
SMS-06-OP-3038 06.11 Manage Risks with Noise
SMS-06-OP-3039 06.12 Manage Risks with Hot Work
SMS-06-OP-3040 06.13 Manage Risks in the Working Environment
SMS-06-OP-3041 06.14 Manage Risks with Workplace Violence
SMS-07-OP-3085 SFAIRP Determination and Demonstration
SMS-06-GD-3047 Guide to WHS Risk Categories
SMS-09-SP-3021 Records Management
SMS-16-SP-3076 Inspection, Testing, Calibration and Monitoring

Version Control

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<tr>
<td>1.0</td>
<td>First release of Sydney Trains SMS</td>
<td>01/07/2013</td>
<td>Launch of Sydney Trains SMS documents</td>
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<tr>
<td>1.1</td>
<td>Minor corrections to logo and change of title from Head of Safety to Group Manager Safety. Correction to reference SMS-06-GD-3048 and hyperlink SMS-06-TP-4103. Correction from Safety Specialist to Safety Professional in process flow step 6.3. Addition of SM04 training to section 6.3. Addition of examples in sections 6.4 and 6.6 for changes in workplace. Inclusion of WHS Risk Registers and Risk Assessments reviews in the summary of Line Manager responsibilities (as per sections 6.3 and 6.6)</td>
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<td>Requirement to manage the safety of workers at workplaces not under the control of the organisation added. Position titles and hyperlinks updated.</td>
<td>1/09/2017</td>
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<td>1.4</td>
<td>Action from SafeWork NSW Assessment Activity, June 2017: Prompt added to Section 6.3 where a risk assessment identifies the following risk categories: hazardous chemicals; hazardous manual tasks or plant and equipment – that in addition to the generic WHS risk assessment, a specific risk assessment for the risk category identified may be required. Section 6.4 modified to ensure risk assessments are conducted prior to the development of controls.</td>
<td>18/12/2017</td>
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| 1.5     | As a result of the introduction of SHEM,  
- SMS-06-FM-4107 WHS Risk Assessment Form will no longer be used to conduct and record the risk Assessment and is withdrawn.  
- SMS-06-GD-3048 Guide to the WHS Risk Register FP Requirements is withdrawn  
- SMS-06-TP- 4103 WHS Risk Register is no longer used for making new entries for reporting hazards. Therefore all the references to above documents are updated to use SHEM. | 02/11/2018 |         |