Preparing and using Safe Work Practices

Purpose

This procedure describes the process for preparing Safe Work Practices (SWP) that have been determined as the most appropriate control measure resulting from structured risk assessments.

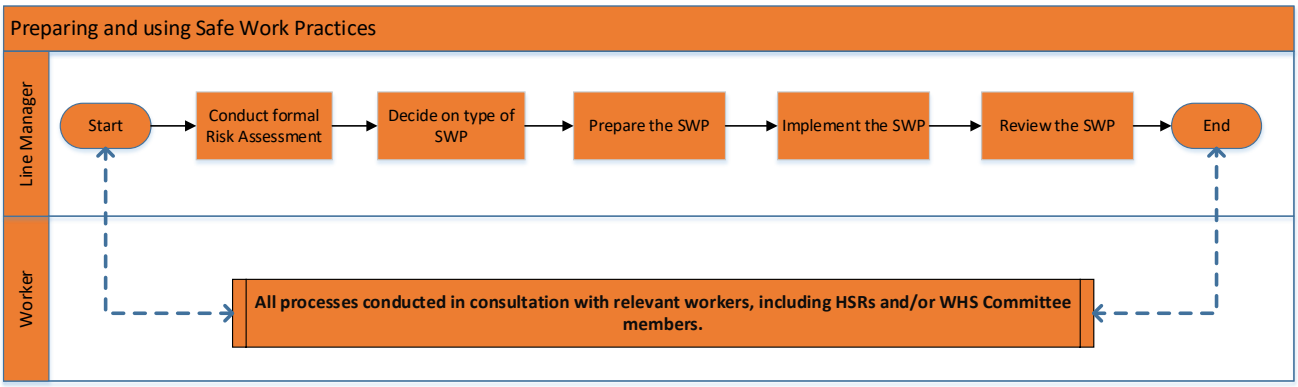
The primary purpose of a SWP is to complement the risk assessment process by examining the work task and considering the safest way to complete it by breaking down and documenting the major processes/tasks into *sequential* steps.

Note: 'Safe work practices' in the context of this document is a term used to describe those work practices that are performed in a certain way to control safety risks. Sydney Trains has categorised SWP as *Safe Work Method Statements (SWMS)* or *Safe Work Instructions (SWI)*.

Scope

This document is applicable to all Sydney Trains workers involved in the development and maintenance of SWP that fall into the following two (2) categories:

- *Safe Work Method Statements* (SWMS): *Clause 299* in the *NSW WHS Regulations 2017* requires SWMS to be prepared before high-risk construction work (HRCW) begins. Importantly, a SWMS is a *"a site-specific statement that must be prepared before any high-risk construction work is undertaken"*;
- *Safe Work Instructions* (SWI) – aimed at local *routine work activities and topics* that are not considered HRCW.



Process description

1. Conduct formal Risk Assessment

Line Manager(s) or person (s) involved with leading/conducting risk management activities shall ensure that, where relevant and required, formal structured risk assessments are conducted in accordance with the SMS-06-OP-3026 WHS Risk Management Procedure.

Note on conducting structured risk assessments: The SMS-06- OP-3026 WHS Risk Management Procedure defines the principles and methodology for WHS risk management and outlines minimum requirements for:

- the systematic, structured and timely approach to hazard identification and risk assessment(s);
- implementation of control measures in-line with the *hierarchy of control* methodology; and
- monitoring and reviewing the effectiveness of corrective actions following the elimination or control of hazards.

2. Decide on the type of SWP

Once confirmed through a formal risk assessment that a SWP is required, the **Line Manager** will coordinate a decision-making process to establish whether the SWP will be documented as a SWMS or SWI. This process, which involves consulting with relevant workers, helps confirm the relevant work activities that pose health and safety risk, which could harm workers.

Note on differences between SWMS and SWIs:
In Australia, SWMS are only required for certain categories of High-Risk Construction work (HRCW). In addition, the following general rules apply:

- **SWMS** are a safety planning tool that identifies the hazards and risks of HRCW and document the control measures necessary to manage those risks. SWMS are **aimed at non-routine and/or temporary work activities**; and
- **SWIs** are intended for **routine work activities that do not fall** under the HRCW categories.

When to develop a SWMS.

The primary purpose of a SWMS is to help supervisors, workers and any other persons at the workplace to understand the requirements that have been established to carry out HRCW in a safe and healthy manner. The SWMS is aimed at:

- describing the activity or task to be undertaken;
- identify the resources, manpower and skills associated with the task;
- define work activities in a logical sequence;
- identify hazards, assess and select control measures (as appropriate); and
- systematically plan the activity so it can be completed efficiently and effectively.

The SWMS must be able to be easily read by those who need to know what has been planned to manage the risks and implement the control measures and ensure the work is being carried out in accordance with the SWMS. This includes:

- the supervisor of the HRCW;
- the worker(s) carrying out the HRCW; and/or
- the Principal Contractor (if it is a construction project) or the person who has management and control over the HRCW.

Both simple and complex activities can be broken down into a series of basic steps that will allow for full analysis of each part of the activity for hazards and potential incidents. The description of the process should not be so broad that it leaves out activities with the potential to cause incidents and prevents proper identification of the hazards nor is it necessary to go into fine detail of the tasks.

A SWMS is required for the following HRCW activities defined in the WHS Regulations. Examples, sourced from the *NSW Construction Work Code of Practice*, include:

HRCW activity	Examples
Work involving a risk of a person falling more than 2 metres	• Installing an evaporative cooler on the roof of a house • Installing roof trusses • Installing roof tiles or roof sheeting • Working adjacent to a pit or opening with a fall height of more than 2 metres.
Work carried out on a telecommunication tower	• Installing equipment on a telecommunications tower
Work involving demolition of an element of a structure that is load-bearing or otherwise related to the physical integrity of the structure	• Knocking down a load-bearing wall in a house • Removing bracing from a wall or roof as part of a renovation • Knocking down load-bearing walls as part of a warehouse conversion
Work involving, or is likely to involve, the disturbance of asbestos	• Removing floor tiles containing asbestos as part of a renovation • Cutting or drilling into an asbestos cement sheet wall • Demolishing a house that contains asbestos • Working on asbestos cement pipework
Work involving structural alterations or repairs requiring temporary support to prevent collapse	• Using props to support a ceiling where a load-bearing wall will be removed.
Work carried out in or near a confined space	• Connecting a new sewer to a sewer main in a 3-metre trench. • Unblocking a sewer line from within a large underground sewer pit.
Work carried out in or near a shaft or trench with an excavated depth greater than 1.5 metres or is carried out in or near a tunnel.	• Laying or repairing pipes or conduits in a trench more than 1.5 metres deep. • Testing drainage pipes in a trench more than 1.5 metres deep. • Working near bored piers greater than 1.5 metres deep. • Building a tunnel in the course of constructing an underground railway or road.
Work involving the use of explosives.	• Using explosives to break up rock or to remove a tree stump. • Blasting to prepare for construction of a building or a road. **Note: Using explosive power tools is not considered 'work involving the use of explosives'.**

HRCW activity	Examples
Work carried out on or near: • **pressurised gas distribution mains or piping;** • **chemical, fuel or refrigerant lines;** • **energised electrical installations or services.**	• Excavating foundations near to an existing gas supply. • Drilling into a wall where electrical wiring live may be present. • Working near overhead or underground power lines. **Note: 'Near' in the above circumstances means close enough that there is a risk of hitting or puncturing the mains, piping, electrical installation or service.** Electrical installations/services do not include appliances such as power leads and electrically powered tools.
Work carried out in an area that may have a contaminated or flammable atmosphere	• Removing pipework or tank that may contain the residue of hazardous chemicals. • Demolishing a petrol station and removing old tanks. • Decommissioning plant.
Work involving tilt-up or precast concrete	• Building housing units using precast panels. • Installing a precast drainage pit.
Work carried out on, in or adjacent to a road, railway, shipping lane or other traffic corridor that is in use by traffic other than pedestrians.	• Using part of the road to deliver construction materials to the site. • Installing drainage that involves digging up part of the road, kerb or gutter. • Building an extra lane on a road.
Work carried out in an area at a workplace in which there is any movement of powered mobile plant	• Working in an area of a construction site not isolated from the movement of skid steer loaders, backhoes, mobile cranes or trucks.
Work carried out in an area in which there are artificial extremes of temperature	• Inside enclosed roof cavities. • Construction work in an operating cool room or freezer. • Construction work alongside an operating boiler.
Work carried out in or near water or other liquid that involves a risk of drowning	• Installing shade sails over a swimming pool. • Building a gazebo adjacent to a swimming pool. • Constructing a bridge over a river or restoring a wharf.
Work involving diving work	• Divers undertaking structural repairs to the jetty of a waterfront home. • Structural work on marinas, wharves and piers.

The **Line Manager** and/or person responsible for carrying out the high-risk construction work is best placed to prepare the SWMS in consultation with workers who will be directly engaged in the HRCW. This person understands the work being carried out, is responsible for providing training, instruction and supervision to the workers undertaking the work and can ensure the SWMS is implemented, monitored and reviewed correctly.

Where there are different types of HRCW occurring at the same time at the same workplace e.g. risk of a person falling more than 2 metres AND an excavation depth greater than 1.5 metres, one SWMS may be prepared to cover all high risk construction work activities being carried out at the workplace. Alternatively, a separate SWMS can be prepared for each type of HRCW. If separate SWMS are prepared, consider how the different work activities may impact on each other and whether this may lead to inconsistencies between control measures.

When to develop a SWI.

A SWI is a written instruction(s) for tasks that outline the preferred method of undertaking a task, whilst emphasising ways to reduce any risk of harm to persons, property or the environment. It is aimed at *routine* activities that do not fall under any of the HRCW categories.

3. Prepare the SWP

Workers and their health and safety representatives (if any) should be consulted in the preparation of the SWP. If there are no workers engaged at the planning stage, consultation should occur with workers when the SWP is first made available to workers, for example during workplace-specific training or a toolbox talk. Workers should also be consulted when a SWP is reviewed.

Preparing SWMS

SWMS should be prepared using SMS-06-TP-4026 SWMS Template and the following must be taken into account:

- the circumstance at the workplace that may affect the way in which the HRCW is carried out; and
- on a construction project, the WHS management Plan prepared by the Principal Contractor.

As a minimum, the SWMS needs to be set out and expressed in a way that is readily accessible and comprehensible to the persons who use it and shall include the following:

- the PCBU's name, address and ABN (if they have one);
- details of the person(s) responsible for ensuring implementation, monitoring and compliance with the SWMS;
- identify work that is HRCW *and state the hazards and risks to health and safety from that work*;

- clearly detail the measures selected to control those risks;
- describe how the risk control measures will be implemented; and
- if the work is being carried out at a construction project:
  - the name of the principal contractor
  - the address where the high-risk construction work will be carried out
  - the date the SWMS was prepared and the date it was provided to the principal contractor
  - the review date (if any).

Note: While not mandated, it is considered good practice for a SWMS to also include:

- names of workers that have been consulted on the content of the SWMS and the date the consultation occurred;
- details of the person(s) responsible for ensuring implementation, monitoring and compliance with the SWMS
- the signature of each worker acknowledging their participation in this consultation and the opportunity to discuss the proposed measures

The content of a SWMS should provide clear direction on the control measures to be implemented. There should be no statements that require a decision to be made by supervisors or workers. For example, the statement 'use appropriate PPE' does not detail the control measures. The control measures should be clearly specified and be considered in accordance with the 'hierarchy of control'.

Notes relating to SWMS:

A SWMS must take into account the circumstances at the workplace that may affect the way in which the HRCW is carried out – that is the site where the high-risk construction work is being carried out, the work environment and the workers carrying out the work.

A generic SWMS may be prepared and used for high-risk construction work activities that are carried out on a regular basis. However, a generic SWMS is not acceptable unless further work is done to make it 'site-specific' i.e. it must be reviewed to take into account the hazards and risks for the specific workplace and be revised as necessary.

If HRCW is being carried out in connection with a construction project, a SWMS must take into account the WHS Management Plan prepared by the Principal Contractor.

A person conducting a business or undertaking must provide the principal contractor with a copy of the SWMS before HRCW starts.

Preparing SWI

SWIs should be prepared using SMS-06-TP-4317 SWI Template where it has been determined as an appropriate risk control measure resulting from, but not limited to, the following:

- outcomes of a risk assessment indicating that it is an appropriate and required control measure;
- acknowledgement that the associated tasks and activities are considered routine and do not fall under the HRCW categories;
- when introducing new work practices, equipment or technology; or
- following on from a workplace inspection, either internal or external (i.e. regulatory inspection).

The SWI should include the following as a minimum:

- reference to the risk assessment, including safety controls for identified hazards and authorisations required to undertake the technique/process or use of equipment/machinery. For example:
  - WHS induction and specific training requirements, qualifications and certificates;
  - specific operator competency requirements; or
  - names of personnel who can approve competency has been achieved.
- precautions to be undertaken before commencing the task;
- Personal protective equipment to be worn while undertaking the task;
- emergency procedures specific to the task, such as power isolation procedure, spill containment, first aid response and after-hours emergency response;
- specific restrictions or requirements if the work is to be conducted After hours. After hours work may require additional authorisation from your supervisor and Safety Officer;
- clear instructions for undertaking the task;
- instructions to ensure that the area is left safe for others to use, such as clean up and shut down procedures; and
- correct waste disposal guidelines.

Note: SWIs and SWMS should be written using plain English and must be set out in a concise, logical, step-by-step, easy-to-read format. The use of photos or diagrams may assist with this process. Reference to the manufacturer's or supplier's user manuals or information may be required to assist in providing accurate information.

The following table provides key activities and principles when developing SWMS and SWIs:

Activities and principles	Information
Sequencing job steps	Break down the task or operation into the basic steps to complete the work task and / or operate the item of plant / equipment. For example, what is done first, what is done next and so on. Record each step of the task in the order of normal sequence, making sure you describe what is done, not how it is done. **Note:** As a working guide, the task description should be contained within approximately ten (10) broad steps. This may vary depending on the complexity and the hazardous nature of the job.
List potential hazards and the associated risks	For each step in the work task, list the potential hazards / risks that are reasonably foreseeable. This may include, but not limited to: • Being struck by or contacted by anything; Striking against or contacting anything; • Being caught in, on, under or between anything; • Falling from height or being exposed to falling objects; • Hazardous manual tasks; • Being exposed to welding rays, fumes, light, electricity or other forms of energy; • Being exposed to stored energy; or • Being exposed to hazardous chemicals.
Recommend control measures	For each step in the work task, list the most appropriate risk control measure that will eliminate or minimise the risk to the person(s) completing the work task. For each potential hazard / risk, identify and list the steps of how the work task is to be completed, including what the operator(s) should or should not do to manage the level of risk. Specifically describe the safe operating procedure and precautions that must be taken for each step. Attach any appropriate information or references. A safe operating procedure may reference other safe operating procedures.
Personal Protective Equipment (PPE)	List the types of PPE that is required to be used whilst undertaking the task. It is unacceptable to use generic phrases such as 'use appropriate PPE' and the specific item of PPE needs to be listed.
Perform the task	Test the written SWP by carrying out the task in accordance with the documented safe operating procedure, completing the following checks: • Inspect the task again; • Check the upstream and downstream tasks that may have an impact; • Seek improvement to the work method; • Consider all hazards at each step; • Ensure understanding in the work group or an individual worker of the hazards associated with each step of the procedure; and • Reassess and modify the SWP, as required

4. Implement the SWP

Implementing SWMS

The following elements are important in implementing SWMS:

- the PCBU representatives (e.g. Line Managers) who are involved in high risk construction work must develop and implement arrangements to ensure the work is carried out in accordance with the SWMS. The PCBU who directly engages the workers that will be performing the high risk construction work is best placed to implement the SWMS and to ensure compliance;
- the responsibility to implement, monitor and review the control measures may be allocated to a person supervising the work such as a work crew's leading hand or supervisor. *However, the duties of the PCBU are not transferrable* and they must be satisfied the control measures are implemented, monitored and reviewed to ensure the health and safety of the workers; and
- if work is stopped, the work and the SWMS should be reviewed to identify non-compliance and ensure that the method in the SWMS is the most practical and safest way of doing the task. If another method is identified as being a reasonably practicable option, the SWMS should be revised to take this change into account before re-commencing work.

Implementing SWIs

While the above-mentioned points are geared towards SWMS, their principles can also be applied to SWIs. In addition, the following points relate to implementing SWIs:

- reassess the *Scope* of the SWI as a way of confirming the objective, why the SWI is needed and who is the intended audience; and
- ensure the SWI gets *tested fully by the end user(s)* and adjust it accordingly. This should include an assessment of the format and writing style to ensure that the SWI captures hierarchical steps and uses simple and concise language.

Note: Training and instruction on the safe work procedure must be provided to all persons that shall be required to undertake the task / process for which the safe operating procedure was developed. This may include a Verification of Competency (VOC) for operational procedures, such as for loaders, crushers, dump trucks, cutting saws, etc.

5. Review the SWP

SWPs should be reviewed on a periodic basis depending upon the level of risk, to ensure that the procedure remains current and appropriate. Reviews of SWPs will be required sooner in the event:

- an incident occurs that relates to the relevant procedure;
- there has been a change to a process;
- new plant or equipment is introduced; or
- new chemicals or substances are introduced.

Note: The SMS-05-SP-3001 Document Control procedure requires SMS documents (other than safety-related Policy) to be reviewed at least every five (5) years to ensure it remains compliant and suitable for use when and where it is needed.

The review process should be carried out in consultation with workers and their health and safety representatives (if any), contractors and subcontractors who may be affected by the operation of the SWP. If the control measures detailed in a SWP are revised, the SWP must be reviewed and revised as necessary.

If a SWP describes a task or process that is no longer required to be followed, then the SWP should immediately be withdrawn and archived. Workers that will be involved in the SWP are to be provided with the relevant information and instruction that will assist them to understand and implement the revised SWP.

The review of SWMS should be undertaken using SMS-06-FM-4024 SWMS Review Checklist and consider the following points:

- when a SWMS has been revised the PCBU should ensure people involved with the HRCW are advised that a revision has been made and how they can access the revised SWMS;
- for a construction project, the Principal Contractor must be given a copy of the revised SWMS. People who will need to change a work procedure or system as a result of the review will also need to be advised of the changes in a way that will enable them to implement their duties consistently with the revised SWMS; and
- where a SWMS is revised, all versions should be kept.

Further information

SMS-06- OP-3026 WHS Risk Management Procedure

SMS-06-TP-4026 SWMS Template

SMS-06-TP-4317 SWI Template

SMS-06-FM-4024 SWMS Review Checklist

Document control

Document custodian:	Senior Manager Safety Management System
Document approver:	Director Network Standards, Systems and Quality

Version history

Version	Effective Date	Change notes
1.6	07/09/2022	Section 5 revised to remove two (2) year review period example and indicates that the review frequency is based on the level of risk. Note also included that draws attention to SMS-05-SP-3001 Document Control procedure requiring SMS documents (other than safety-related Policy) to be reviewed at least every five (5) years to ensure it remains compliant and suitable for use when and where it is needed.