

2019 Audit findings and some general observations



November 2019

Peter Gosling

2019 audit elements



Audits are compromised of six specific elements

- 1 Document control, internal audit and external audit
- 2 Hazards of work and task related hazards
- 3 Workers safety roles / consultation
- 4 Critical controls
- 5 Fatigue management
- 6 MoC for practising certificate holders

I would like to take some time to discuss our findings in general terms, then challenge your thinking, re effectiveness of training

2019 audit findings

1

Document control, internal audit and external audit

General comments

- Document control - approved version available on the DCS - generally well done
- Internal review / audit – not well done except when preparing for resubmission. Propose that a review date is set within “work order system” and then use the audit tool from the CS website
- External audits – some IO’s from previous audits have been turned into commendable practices, some IO’s have been ignored



Hazards of work and task related hazards

General comments

- WHS (M&P Sites) Regulation Clauses 103 and 104 and Order 34 Guideline section 3.6 and Clause 39 of the WHS Regulation 2017
- Some sites are doing this very well others are using the induction process exclusively
- Inclusion of a hazard list within training documents was identified as commendable for new or refresher training
- Event / incident reports are a source of hazard ID



Worker's safety role and consultation

- WHS (Mining and Petroleum sites) Regulation Clause 120 and Order 34 Guideline - Section 3.6.5
- Consultation processes across the industry are very good with a wide range of personnel being used in Risk Assessments and reviews of PHMP's and PCP's
- Most sites are involving health and safety representatives or SSHR's in reviews
- There needs to be further consideration of a cross section of relevant workers and external SME's



4

Critical controls

- Various terminology used across the industry
 - Catastrophic hazards
 - Material risks
 - Core hazards
- Most critical controls have been developed at corporate level and have involved management personnel plus some worker representation
- Transfer of information relative to critical controls has been ordinary (mostly by TBT, Pre-shift etc.)
- Retention levels by workers is poor which questions the “effectiveness” of training



5

Fatigue management (training)

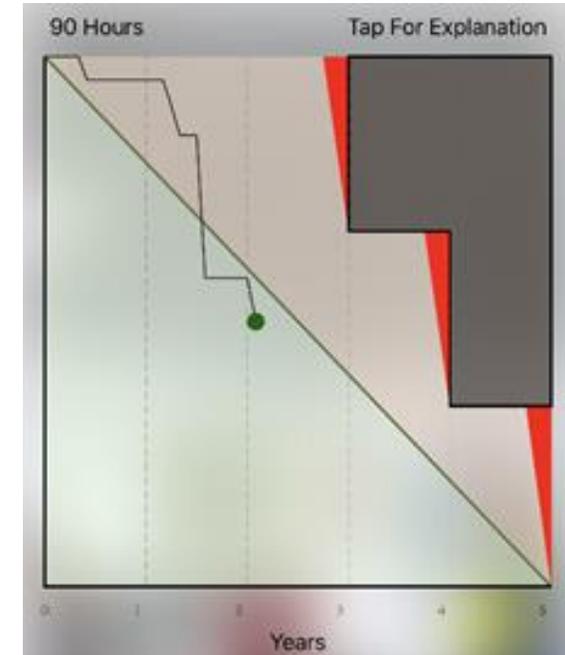
- Fatigue management practices NSW Coal Mines
- Most sites have considered the findings of the report
- Majority have developed fatigue assessment checklists
- SME's have been involved in Risk Assessments
- Surprisingly, large number of sites have not developed and implemented specific training for supervisors

2019 audit findings

6

MoC for practising certificate holders

- As a result of your requests
- Coal Services MoC app positively received
- Understanding among users is at mixed levels
- Some sites are reluctant to promote the app
- Itinerant workers pose a risk and recruitment processes
- Progress toward full compliance has been slow



Are there any questions relative to the audit findings?

Observations

103 Duty to inform workers about safety management system

- before a worker commences work,
- summary of the SMS that is relevant to the worker's work
- summary of each PHMP that relates to any risk that may arise at work

104 Duty to provide information, training and instruction

- 2) operator of a mine must ensure that each worker at the mine is provided with suitable and adequate information, training and instruction
 - (a) hazards associated with the work
 - (b) implementation of control measures
 - (c) content & implementation of parts of the SMS
 - (d) the emergency plan
 - (e) safety role for workers
- 3) A PCBU at a mine must ensure that each worker engaged is **trained, and competent**, in basic risk management techniques used at the mine having regard to the nature of the work carried out by the worker.



105 Duty to provide induction for workers

- information, training and instruction on the SMS

Effectiveness of training

There are many processes available to impart information, training and instruction.

Many coal operations are currently reviewing how they impart this information, training and instruction.

It appears, from interviews, that the content of Induction is significant and is continuing to increase, imposing pressure on Trainers to deliver the induction material within a short period (or restricted amount) of time.

The auditors are suggesting that sites undertake a **review of the Induction process** and analyse the **effectiveness** of the induction process in light of the amount of information contained within, and the restricted time available to impart the information.



If Induction (abbreviated) is the process to achieve the outcomes listed above ??

Effectiveness of training



In your group take a few moments to identify how do you measure “effectiveness”.

- What would be the ideal outcomes of an effective Induction?
- How long has it been since the Induction has been evaluated?

Section 6.1 of Order 34 Guidelines – Measurement and Evaluation

- Establish goals and objectives for training & assessment activities
- How to measure effectiveness of training & assessment activities

If an audit of the Measurement and Evaluation of training and assessment activities, as described within your TCMS, were to occur, how would your site fare?



Coal Services

