

Discussion - Info Sheet

Right to Know

An employee has the right to be informed by their employer of any known or likely hazards in the workplace. In addition to the right to be advised of these risks, they have the right to be provided with the framework, education/training, and supervision required to protect them against these risks.

Examples within the construction industry include, safety data sheets, safe work method statements, company policies or work procedures, internal/external training, emergency procedures, toolboxes etc.

Right to Participate

An employee additionally has the right to provide input into the steps taken by the employer to ensure their health and safety whilst at the workplace.

Participation can include having the opportunity to be a member of the health and safety committee, being a health and safety representative, having a reporting system for incidents and near misses, and having access to processes for being able to provide suggestions/feedback on health and safety items.

Right to Refuse

At the end of the day, an employee has the right to refuse work or tasks should they believe that the employer has failed to ensure their health and safety whilst at work. An employee should not perform work they do not believe is safe or being adequately risk managed.



HSEQ LEADERSHIP COMMITMENT

Standard
Business Management Systems (BMS) Group
Document No.: HEQ-STD-00940





Document Version Control

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7	08/11/2019	Amendment to the 'Position' table in Section 8.2.	Patrick Pearl
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4	01/12/2015	Inclusion of BMD's requirements around due diligence. Content amendments: now includes Section 4 Defining an Officer; Section 5 What Should Officers Do and Section 6 Due Diligence Action Plan.	Patrick Pearl
3	16/07/2015	Amendment to reflect the change from SBO to ABC.	Patrick Pearl
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HSEQ Leadership Commitment

Business Management System (BMS) Group Standard

Document No.: HEQ-STD-00940

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1. Purpose

The purpose of this document is to detail BMD's leadership commitment and due diligence processes that are focused on ensuring that all employees continue to strive towards the Group's health, safety, and environment goals, along with delivering a quality product. This document also outlines the process for accountability and responsibility of Group Management by demonstrating personal commitment in achieving a safe environment.

BMD will manage its commitment to Health, Safety, Environmental and Quality (HSEQ) by the following:

- Developing individual measurements of the management inputs necessary to deliver reliable and sustainable performance.
- To demonstrate Group, Operational and Project Management HSEQ commitments and responsibilities by coordinating actions with clear accountabilities and regularly monitoring performance.
- To clearly connect HSEQ inputs with broader project and business Targets and Objectives, which can be found in the [Management Systems Objectives and Targets](#) plan.

[BMD's Group business strategy](#) outlines specific objectives to be achieved within five key focus areas before June 2023. These objectives align with the strategic anchors of people, process and performance and aim to achieve BMD's ultimate purpose of sustaining a profitable business by supporting our staff to deliver exceptional performance for our stakeholders.

To achieve this purpose, we will understand and manage risks and opportunities, continue to implement our diversification strategy, and commit to cash flow transparency at appropriate levels. Consistent performance through a one team approach and by harnessing the capability of our exceptional employees will ensure we continue to deliver exceptional outcomes for our clients.

2. Scope

This document encompasses BMD Group subsidiaries including BMD Constructions, BMD Urban, JMac Constructions, Empower and Joint Ventures (JV) where no other procedures or processes are specified. Leadership commitment applies to all BMD employees.

3. Introduction

The Group Director - Chief Executive Officer has the overall HSEQ responsibility for the BMD Group. The accountability for the implementation, ongoing maintenance and monitoring of this function has been delegated to the General Manager – Systems.

The General Manager – Systems will liaise with the respective Group Functional Managers to provide technical and administrative support for effective and efficient operational support.

Position descriptions for the Group Functional Managers ([Safety](#), [Environmental](#) and [Quality](#)) and relevant organisational charts are available on the Business Management System (BMS), see [Organisation Chart - BMS](#).

The relevant Work Health and Safety Acts imposes a specific duty on Officers of the Company (Officers) being Top Management to exercise due diligence to ensure that the corporation meets its work health and safety obligations.

The duty requires Officers to be proactive in ensuring that the corporation complies with its duty.



Similarly, the environmental legislation of each State and Territory requires BMD to show due diligence in its operations, led by its Operational Senior Management to meet its general environmental duty and prevent environmental harm.

Compliance to The Fair Work Act 2009 (the Act) is managed by the Human Resources (HR) department. The [Human Resources Management](#) standard, associated systems and processes detail how these elements are governed.

Exercising due diligence results in several benefits such as reduced incidence of work-related injuries and illnesses, reduced number of environmental incidents, reduced lost time, reduced worker's compensation costs, increased productivity, and improved quality.

4. Top Management Requirements for International Standards Organisation (ISO) Standards

For the purposes of the ISO45001 Occupational Health and Safety Management Systems, ISO45003 Occupational Health and Safety Management - Psychological health and safety at work - Guidelines for managing psychosocial risks, ISO14001 Environmental Management System and ISO9001 Quality Management System standards, 'Top Management' is defined as 'a person or group of people who direct and control an organisation at the highest level'. For the BMD Group 'Officers of the Company' as described in [Section 8.2](#) are defined as having responsibilities as 'Top Management'.

5. Operational Roles and Responsibilities

Board

The BMD Board has overall responsibility and accountability to ensure efficient management of the HSEQ management system is in place and to ensure the integration of HSEQ management practices into BMD's core strategies, processes, and priorities.

Group Director – Chief Executive Officer

The Group Director - Chief Executive Officer has overall HSEQ responsibility, including reporting on the HSEQ management systems to the Board and the Operational Senior Management group for the effective and compliant operation of the safety, environment, and quality management systems.

The responsibility for the effective and efficient management of the Group Business Management System (BMS) has been delegated to the General Manager – Systems along with responsibility of leading the integration of HSEQ management practices into BMD's core strategies, processes, and priorities.

Operational Senior Management (General / Operations / Construction Managers)

Operational Senior Management is defined as the off-site regional Senior Management team for BMD Constructions, BMD Urban, JMac Constructions, Empower and Urbex and hence may be listed as Officers and / or potential Officers in Section 8 below.

Operational Senior Managers must:

- Be responsible for the effective and efficient use of the BMS to ensure currency and compliance of all legislative obligations
- Participate in the development and reviews of the Business Unit / Regional Risk Register¹

¹ FSC Audit Criteria FP.1



- Ensure compliance with the Due Diligence Plan (DDP), and also provide training for all new and/or promotion Officers or Possible Officers of the company
- Undertake monthly reporting, made up of the Construction Leadership Team (CLT) and Senior Leadership Group (SLG) reports
- Monitor and review regional and project compliance of HSEQ Lag and Positive Performance Indicators
- Participate in Boardroom De-brief as per Incident & Accident Management standard requirements
- Review Project's HSE and Quality Statistic reports and provide feedback as required
- Ensuring the promotion of customer focus throughout the organisation via relationships and reporting
- Identification and communication of trends in HSEQ reports
- Action and monitor non-compliance/conformance within agreed timelines.

General Manager – Systems

The General Manager – Systems has been delegated the responsibility for the effective and efficient management of the Group Business Management System including:

- Developing and providing the strategic leadership and direction for the Group's Business System for HSEQ to ensure these systems continually improve
- Monitor compliance with the Due Diligence Plan (DDP), and also provide training for all new and/or promotion Officers or Possible Officers of the company
- Ensuring the BMD systems conform with the Safety Management Systems standards ISO45001 and ISO45003, Environmental Management System standard ISO14001 and Quality Management System standard ISO9001
- Reviewing and making recommendations for various HSEQ elements of the BMS
- Make key changes to the system to ensure continual improvement, reduce risk and increase opportunity
- Reporting on the performance of the HSEQ management systems, including overall HSEQ performance to Officers of the company (Top Management)
- Reviewing and providing feedback on CLT/SLG reports and communicating monthly review outcomes to senior management.

Project Managers

These managers are responsible for effectively and efficiently implementing and maintaining compliance with HSEQ requirements. HSE and Quality Statistic reporting, including the project specific HSEQ Leadership Commitment – Scheduler process in their areas of responsibility by ensuring that:

- The process is understood and applied at all project management levels down to frontline supervisors
- They personally engage in their agreed-upon tasks, as in the HSEQ Leadership Commitment – Scheduler
- The communication and implementation of key changes in the system at a Business Unit and Project level have been completed
- Project teams perform to the required quality set
- The quality of that performance
- All project team members are regularly visible in the field, demonstrating BMD's Values and expectations
- Develop Project HSE and Quality Statistic reports, identifying trends and actions for ongoing HSEQ improvements
- Identifying and acting upon non-compliance issue and trends, and ensure they are rectified
- Boardroom debriefs are arranged, when necessary, as per the Incident and Accident Management Standard requirements.

HSEQ Personnel

HSEQ personnel are responsible for advising and assisting in the implementation of the system and provide ongoing support including:

- Providing support for Business Units and Projects around key changes in the system

- Visibility in the field demonstrating BMD's Values and expectations
- Identification and tracking of lead / lag trending of HSEQ information on the projects and/or Business Unit level and verifying that they have been suitably managed
- Ensuring that support documents (e.g., inspection checklists, procedures, WMS and JHA templates) are available and appropriate
- Auditing to ensure compliance and the identification of trends
- Recording performance as nominated in the system
- Providing the Project Manager with information and advice on emerging HSEQ trends or issues (including Incidents), and also provide recommendations of suitable corrective actions
- Downloading and circulating reports of individual projects and overall Business Unit HSEQ performance (at least once-per-month)
- Advising on appropriate task frequency
- Supporting the communication and visibility of any updated information by displaying items on the notice boards, with the notice boards being updated at least once-per-week.

Group Functional Managers

The Group Functional Managers (Safety, Environmental and Quality) are responsible for providing technical support with respect to their area of expertise for the BMD Group with the following:

- Communicate key changes within the business system to ensure continual improvement
- Review and make recommendations for various Health, Safety, Environment and Quality (HSEQ) elements of the BMS at monthly meetings
- Conduct scheduled site visits and audits
- Approve and authorise HSEQ Alerts
- Ensure the implementation of effective incident and accident management processes
- Review of Flash Alerts
- Resource and/or participate in serious or high potential investigations
- Communicate legislative changes
- Lead and schedule pressure tests.

Superintendents and Supervisors

Superintendents and supervisors are accountable for:

- Visibility in the field demonstrating BMD's Values and expectations
- Ensuring that tasks assigned to them are completed within the agreed timeframes
- Ensure all employees compliance with BMD's HSEQ requirements, policies, and procedures
- Ensuring that required documents (e.g., area inspection checklists, procedures, WMS and JHA) is completed
- Ensure the communication and implementation of key changes in the system at a project level have been completed
- Participate in the identification of any emerging trends or issues, also the development and implementation of corrective actions
- Providing feedback to all project employees of any Business Unit/Region or Project emerging trends or issues, also the corrective actions which have been identified.

6. Off-site Senior Management Commitment

Off-site Senior Management will ensure that the following management system accountabilities are implemented maintained and regularly reviewed.



6.1. HSEQ Policies

BMD Board shall establish with Operational Senior Management to implement and maintain safety, environmental and quality policies for the BMD Group. These policies shall be developed to ensure they meet the requirements of the ISO9001, ISO14001 and ISO45001 and ISO45003, and management standards.

Project Management will ensure signed and authorised HSEQ Policies are communicated to all project workers and that the policies are:

- located on all HSEQ Notice Boards or a prominent location on each site
- communicated to all workers during induction.

Policies are reviewed every five (5) years, unless there is a significant change to BMD operations, to ensure currency and compliance to respective acts, regulations, legislation, codes of practice and other associated documents via the HSEQ Steering Committee.

6.2. HSEQ Reporting

The General Manager – Systems and Chief Risk Officer provides monthly reports on the HSEQ management system to the Group Executive Board, Senior Leadership Group (SLG), Construction Leadership Team (CLT) and other senior management groups through the SLG and CLT Report.²

All construction Business Units (e.g., Constructions, Urban and JMac) prepare a monthly SLG/CLT Report which encompasses health, safety, environment, and quality information for their respective group. Business Unit reports are then submitted for review and inclusion in the monthly SLG/CLT meeting. Copies of the Business Unit's HSE and Quality Overview Reports are to be circulated and communicated to all project employees.

6.3. Operational Senior Management Site Visits

Business Unit General Managers and/or delegated Operational Senior Managers will regularly visit (as a minimum of one visit per quarter per person) project sites and discuss HSEQ issues with site management and employees. The visit will include an [Activity Based Conversation \(ABC\)](#) being conducted while onsite³.

6.4. Resources

Operational Senior Management shall ensure that the necessary resources are provided to support the HSEQ Management Systems across the Group. This shall include the appointment of the following:

- Business Unit HSEQ roles
- Project based HSEQ representatives (as required).

Refer to BMD Organisation Charts located in the BMS.

6.5. Communication

Operational Senior Management shall communicate the importance of effective HSEQ management and conforming to the systems through the following:

² FSC Audit Criteria FP1.2

³ FSC Audit Criteria FP1.4



- HSEQ Committee Meetings
- Business Unit and Regional HSEQ and/or Construction Meetings
- BMD Online Training (BOLT)
- Alerts and system updates
- Boardroom debriefs following incidents.

6.6. Ongoing Operational Senior Management Review

The documented process for Operational Senior Management monitoring, resolving and preventing extreme or high HSEQ issues is documented in the [Incident and Accident Management](#) standard. BMD has established a Group HSEQ Steering Committee whose responsibility is to lead HSEQ issues across the Group.⁴ HSEQ topics and initiatives that are discussed are to be communicated to the wider Group via the Business Unit and regional representatives.

Compliance with Positive Performance Indicators is processed through the HSE, and Quality statistics detailed in the monthly CLT, quarterly SLG and Project reports.

General Manager – Systems will review and make recommendations for various HSEQ elements of the BMS at monthly meetings, to ensure continued suitability, adequacy and effectiveness including assessing opportunities for improvement and the need for changes to the HSEQ elements, policy, and any objectives.

6.7. Management System Review

General Manager – Systems and senior management shall undertake a review the BMD HSEQ management system, at regular intervals, to ensure its continuing suitability, adequacy, and effectiveness for the business, and provide the HSEQ Steering Committee with an overview and comments. The review shall include consideration of:

- a) the status of actions from previous management reviews
- b) changes in:
 - 1) external and internal issues that are relevant to the HSEQ management system
 - 2) the needs and expectations of interested parties (e.g., clients, stakeholders, legislative bodies), including compliance obligations
 - 3) changes to regulatory requirements
 - 4) HSEQ hazards (physical and psychosocial), aspects and impacts, risks, and opportunities
- c) the extent to which HSEQ objectives have been achieved
- d) information on the organisation's HSEQ performance, including trends in:
 - 1) nonconformities and corrective actions
 - 2) continual improvement
 - 3) monitoring and measurement results
 - 4) process performance and conformity of products and services
 - 5) fulfilment of its compliance obligations
 - 6) audit results

⁴ FSC Audit Criteria FP1.2

- 7) incidents
- 8) consultation and participation of workers
- e) the suitability, adequacy, and effectiveness of the HSEQ management system
- f) adequacy of resources
- g) relevant communication(s) from interested parties, including complaints and customer satisfaction and feedback
- h) community expectations
- i) performance of external parties
- j) opportunities for continual improvement.

The outputs of the management review are to be reported to Operational Senior Management through the Board, CLT and HSEQ meetings and shall include:

- conclusions on the continuing suitability, adequacy, and effectiveness of the HSEQ management system
- decisions related to continual improvement opportunities
- decisions related to any need for changes to the HSEQ management system, including resources
- actions, if needed, when HSEQ objectives have not been achieved
- opportunities to improve integration of the management system with other business processes, if needed
- any implications for the strategic direction of the organisation.

6.8. Project Specific Management Plans

For each project/site Safety, Environment and Quality Management Plans are incorporated in the IPMP, or are separate depending on the individual project requirements, these plans:

- are site specific and relevant to site risks
- are reviewed by, or designated representative of, the Business Unit Safety, Environment and Quality Functional Lead
- are signed off/authorised by the Project Manager or Off-site Operational Senior Management who has overall HSEQ responsibility for the project⁵
- clearly defines the HSEQ roles and responsibilities of project management
- apply to all activities undertaken, or proposed to be, undertaken by the company
- define the organisations' priorities and agreed timeframes
- define HSEQ objectives and targets applicable to the project, and meeting the [Management Systems Objectives and Targets](#) plan requirements as a minimum.

7. On-site Project Commitment

⁵ FSC Audit Criteria FP1.1



The Project Manager must allocate and communicate the Safety, Environmental and Quality Objective and Targets in accordance with the [Management Systems Objectives and Targets](#) plan.

The level of compliance of the project shall be monitored using the HSE and Quality Overview Reports. These are the mechanisms to monitor and ensure that the multiple Safety, Environment and Quality Objectives and Targets necessary to deliver required HSEQ outcomes happen at the required frequency and standard. Individual level of compliance with the project's HSEQ Positive Performance Indicator shall be tracked and monitored through the use of [HSEQ Leadership Commitment – Scheduler](#).

7.1. Project Management Ownership

Continual improvement of HSEQ on BMD projects will be achieved through project management ownership and monitored by the relevant Operational and Construction Manager. This ownership will be through assigning accountabilities, tasks and monitoring performance as highlighted in the project roles and responsibilities.

Key Project Initiatives:

- HSEQ Leadership Programs
- Measure workers HSEQ commitment by their adherence to following procedures
- Communicate HSEQ to engage broader business improvement
- HSEQ matters discussed during all communication, such as start-up meetings and toolboxes.

7.2. Role Clarity

The HSE and Quality statistic reports and the [HSEQ Leadership Commitment – Scheduler](#) processes set clear measurable performance targets for individuals that can be aggregated by role (e.g. engineer, foreman) or work area (e.g. earthworks or structures). This monitoring process allows analysis and understanding of individual, project, and group contributions.

This process also defines the role of HSEQ support staff as being available to provide support to project management as well as a quality control to ensure inputs are to the required standards.

7.3. Lead Indicators⁶

The HSE and Quality statistic reports and the [HSEQ Leadership Commitment – Scheduler](#) processes and records participation in activities, generating a quantifiable measure of compliance and effort. This allows project and BMD Group Management to consider lead indicators as well as lag incident and injury data when analysing HSEQ performance⁷.

7.4. Performance requirements and Targets

Below you'll find a list of meetings individuals are required to ~~lead~~ during the month:

⁶ FSC Audit Criteria FP1.4

⁷ FSC Audit Criteria FP1.2

Project Staff	No. of Safety-Related Meetings ⁸	No. of Environmental Meetings ⁸	No. of weekly Site Safety Inspections	No. of weekly Site Environment Inspections	No. of Activity Based Conversations	HSEQ Corrective actions closed-out ⁹
Field operational & Support	3 per month	1 per month	1 per month	1 per month	2 per month	100% of assigned actions
Non-field Support (e.g., Office Admin)	1 per month	1 per month	0	0	1 per month	100% of assigned actions
Operational Senior Management (e.g., Head Office)					Quarterly	100% of assigned actions

Note: The table above highlights BMD Group's mandatory minimum Positive Performance (PP) requirements for each individual to "Lead" and projects may elect to establish higher targets for their project as required. ABC's and inspections can be conducted in groups with a maximum number of four (4) participants with the only Leader having PP recorded.

7.5. How the Process connects with Risk Management



The HSEQ Leadership Commitment Schedule process supports all steps of effective risk management. It ensures that when required inputs occur, they're recorded, reviewed, and adjusted over the duration of the project. This includes:

- Monitoring the status of risk controls
- Ensuring that risk management processes are applied over the duration of the process
- Early identification of potential issues allowing for proactive management.

8. Legal Due Diligence

8.1. Due Diligence Plan

As a requirement under the Commonwealth Workplace Health and Safety Act 2011 (WHS Act) and environmental legislation, Officers need to ensure there is a system in place that records and provides evidence of compliance for BMD Group requirements. To assist in this process the Group Due Diligence Plan (DDP), available in [Appendix 1](#), has been created and communicated to staff.

The DDP is a tool which identifies a generic description of compliance/audit elements and has then been matched against BMD key activities and processes clearly showing how each element is addressed through the Group.

The DDP has been developed to:

- ensure that core, critical actions are carried-out in a timely manner

⁸ and / or communications (Toolbox Talks) (pre-start meeting not included)

⁹ (by due date)

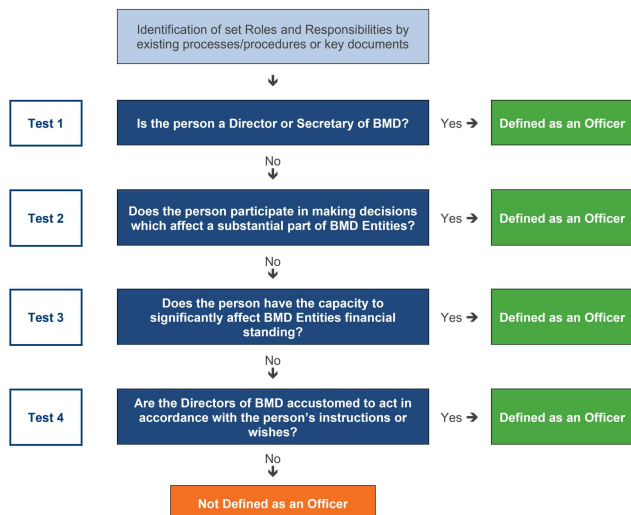
- allow Officers to plan for and demonstrate compliance
- reduce and streamline existing processes
- remove ambiguity and to ensure there are no gaps in process and performance.

When reviewing the Plan under the section "Practical Action Section" the term "All" refers to all BMD Business Units Personnel who may be Officer for the purpose of HSE legislative and their due diligence is only applicable to their own relevant area of influence. Additional requirements are identified under relevant business units e.g., "Constructions" Personnel who may be Officer for the purpose of HSE legislative.

References to "Key Personnel" who may be Officer for the purpose of HSE legislative, and also includes Operational Senior Management of BMD.

8.2. Defining an Officer of the Company

The following process flowchart provides a check for identifying if a Worker is considered to be an Officer as defined by the *Corporations Act 2001*.



Additionally, the following table provides guidance as to who an Officer may be for the purpose of HSE legislative.



Position
BMD Group
All Directors
Company Secretary
General Counsel / Legal Counsel
General Manager – Systems
Chief Risk Officer
Group Human Resources Manager
General Manager Corporate Services
National General Manager – Commercial and Risk
National General Manager – Strategy
Group Safety Manager (Functional Lead)
Group Environmental Manager (Functional Lead)
BMD Constructions
Executive General Manager
General Managers – (Northern Region and Southern Region)
General Manager – All Regions
Operations Managers - All Regions
BMD Urban
National General Manager – Urban
Northern Regional Manager – Urban
Southern Regional Manager – Urban
Operations Manager - Pipework
JMac Constructions
General Manager – JMac Constructions
Operations Manager – JMac Constructions
Empower
National General Manager – Empower
Urbex
General Manager – Urbex

8.3. Duties of Officers

Education	Understand the nature of the operations and generally the hazards and risks associated with those operations	Maintain an up-to-date knowledge of safety and environmental laws and compliance requirements
Reporting	Ensure appropriate resources and processes to enable the identification, reporting and control of specific safety hazards and risks	A process for receiving, considering, and ensuring a timely response to information regarding incidents, identified hazards and risks. Have in place and comply with a process for receiving, considering, and promptly responding to safety reports.
Verifying	Verify that risks and hazards are being appropriately controlled.	

9. References

- [Work Health and Safety Act 2011 \(Commonwealth\)](#) - (Division 4 Duty of officers, workers and other persons)
- [Work Health and Safety Regulation 2011 \(Commonwealth\)](#)
- [Work Health and Safety Act 2011 \(Qld\)](#) including [Due Diligence](#)
- [Work Health and Safety Regulations 2011 \(Qld\)](#)
- [Work Health and Safety Act 2011 \(NSW\)](#) – (Division 4 Duty of officers, workers and other persons)
- [Work Health and Safety Regulations 2011 \(NSW\)](#)
- [Work Health and Safety Act 2011 \(ACT\)](#) – (Division 2.4 Duty of officers, workers and other persons)
- [Work Health and Safety Regulation 2011 \(ACT\)](#)
- [Occupational Health and Safety Act 2004 \(Vic\)](#) - (Part 3 General Duties Relating to Health and Safety)
- [Occupational Health and Safety Regulation 2007 \(Vic\)](#)
- [Work Health and Safety Act 2012 \(Tas\)](#) – (Division 4 Duty of officers, workers and other persons)
- [Work Health and Safety Regulation 2012 \(Tas\)](#)
- [Work Health and Safety Act 2012 \(SA\)](#) – (Division 4 Duty of officers, workers and other persons)
- [Work Health and Safety Act 2012 \(SA\)](#)
- [Work Health and Safety \(National Uniform Legislation\) Act \(NT\)](#) – (Division 4 Duty of officers, workers and other persons)
- [Work Health and Safety \(National Uniform Legislation\) Regulation \(NT\)](#)
- [Occupational Safety and Health Act 2017 \(WA\)](#) – Division 2 General Workplace Duties)
- [Occupational Safety and Health Regulation 2020 \(WA\)](#)
- [BMD Corporate Safety Policy](#)
- [BMD Corporate Environmental Policy](#)
- [ISO14001:2015 Environmental Management System](#)
- [BMD Quality Policy](#)
- [ISO9001:2015 Quality Management Systems](#)
- [ISO45003: Occupational Health and Safety Management Systems](#)

Associated Documents:

- [Business Management Systems Framework](#)
- [Business Management Systems Guide](#)
- [Management Systems Objectives and Targets](#)
- [HSEQ Leadership Commitment - Scheduler](#)
- [Position Description Group Safety Manager](#)
- [Position Description Group Quality Manager](#)
- [Position Description Group Environmental Manager](#)
- [Organisational Chart - BMS](#)
- [Risk Management](#)
- [Incident and Accident Management Standard](#)
- [Activity Based Conversation](#)

Appendix 1: Due Diligence Plan

Please refer to [Section 8](#) 'Legal Due Diligence' for further clarification of Key Personnel and practical actions.

Objective	Element	Outcome to be achieved	Practical actions	Possible Evidence
Understanding the nature of the business	Operational awareness	Key Personnel should be aware of (and if not, seek information about) the operational activities undertaken by BMD and the facets of those operations that may have associated health and safety hazards (physical and psychosocial) and environmental aspects. That is the know Business or Undertaking for BMD as a Person Conducting a Business Undertaking (PCBU) under the WHS Act. This will assist in making the boundaries of the obligation clear.	All - Key Personnel to have access to and are aware of elements detailed in the Group Risk Register. - Communicate any new and/or changes of extreme or high HSEQ risk identified in the Group Risk Register to Key Personnel through SLG/CLT reports and HSEQ Steering Committee. - Provide training in the Due Diligence Plan (DDP) for all existing, new and/or promotion Officers or Possible Officers of the company. - General Manager – Systems and Chief Risk Officer to ensure Risk Registers are reviewed and maintained. - The relevant Business Unit is to provide a Risk Register for review by the Business Unit's Operational Senior Management Team (refer to Risk Management standard). BMD Urban / Constructions and JMac In conjunction with the above: - Each Business Unit is to ensure all their Projects have an up-to-date Risk Register with any identified extreme risk being entered into the Business Unit Risk Register. Extreme or high project HSEQ risk to be incorporated into the project Monthly report. - Regular visits to operational areas and projects with a specific focus on Safety, Environment and Quality in order to understand the Risk Register. This should be undertaken by Key Personnel relevant to the particular area or activity. - Safety, Environment and Quality management items raised at the Group HSEQ Steering Committee meeting. Key Personnel are to receive a monthly report at each meeting containing HSE and Quality Overview summaries of project safety, environment and quality information through lead and lag indicators, identifying emerging Safety, Environmental and Quality issues and outlining steps taken (or to be taken) to address those issues. - Review the comprehension of the Emergency and Crisis Management processes, and management of a serious/crisis situation via the performance of a scheduled 'Pressure Test Drill'. Urbex / Empower In conjunction with BMD Group: - Ensure a Risk Register is developed for each Land Development Package (Urbex) and/or Design Package (Empower). Extreme or high HSEQ risk items are to be incorporated into the Monthly reports. - Communication of Identified HSEQ Risk to the engaged Consultant (Urbex). - Provide copy of a Risk Register covering any Safety in Design, Environmental and Quality aspects to the Constructor (Empower).	- Group Risk Register - CLT Reports and HSEQ Steering Committee minutes - Record of training - Record of review - Business Unit Risk Register - Project Risk Register and Project HSE and Quality Overview reports - Record of Operational Senior Management's ABC - Minutes of HSEQ Steering Committee meetings - Record of Pressure Test information and reports - Risk Register - Records of meeting - Records of Risk Register hand-over

Objective	Element	Outcome to be achieved	Practical actions	Possible Evidence
	History of Safety and Environment issues	Key Personnel are required to have an understanding of the safety (physical and psychosocial) and environmental risks relevant to their direct BMD's operations. Also, should have a general understanding of such matters, even if it is not specific to their direct operations. Information should therefore be obtained about safety and environmental issues that: - BMD is currently aware of its operations, and how it is prioritised - Past safety and environmental issues that have arisen and how they are being managed - Issues/risks known to be typical within the specific industry sectors that BMD is involved (for example the common risks confronting the construction industry). Ongoing information should be obtained on areas of particular concern for the construction (including prosecution activity).	All - BMD's General Manager – Systems and Chief Risk Officer will be available at the Construction Leadership Team (CLT) and Senior Leadership Group (SLG) and HSEQ Steering Committee meetings to answer questions that Key Personnel might have in relation to this information. - Every month, Key Personnel will be provided with a HSE Overview Report, outlining HSE performance onsite, key trends/issues/incidents over the previous month and steps taken to address those trends/ issues/incidents. - HSE Alerts (both internal and external to BMD), also legislation register, and update sourced from Workplace Safety Australia and Environmental Australia Pty Ltd is reviewed by Operational Senior Management and further communicated across the BMD Group (as appropriate).	- Record of meeting minutes - HSE Overview report - Records of Alert circulation
Up to date knowledge of Safety and Environmental laws and compliance requirements	Understanding of BMD's legal duties under relevant WHS and Environmental laws.	Key Personnel should have access to a legal compliance register that identifies the list of safety and environmental duties that BMD is obliged to meet. Nominated personnel to attend Safety and Environmental legal training on an annual basis. Different levels of Officers require different levels of detailed knowledge. An appropriate level of knowledge and regular updating thereof is required.	All - All Key Personnel are to have access to, and an awareness of, the Safety and Environmental Legal Register sourced from Workplace Safety Australia and Environmental Australia Pty Ltd. - Provide training in the Due Diligence Plan (DDP) for all existing, new and/or promotion Key Personnel. - Safety and Environmental Legal Registers are to be kept up to date by Workplace Safety Australia and Environmental Australia Pty Ltd and the relevant Group Functional Managers, with any changes communicated to Key Personnel and the HSEQ Steering Committee. - Report containing a summary of any upcoming legislative changes, impacts to the BMD Group and steps to ensure ongoing compliance is to be develop and circulated to Key Personnel. - Functional Leads to review and further communicate changes and impacts, with Business Unit to implement required changes. - External legal training to be provided to Key Personnel regarding impending legislative changes. BMD Urban / Constructions and JMac In conjunction with the above: - Relevant Business Unit's to identify and implement any legal training regarding impending legislative changes. - Review understanding and management of legal duties during a Safety and/or Environmental serious/crisis through the performance of scheduled 'Pressure Test Drill'. - Monitor that all regulatory permits and licences are identified, obtained, and complied with for all projects. Urbex / Empower In conjunction with the 'All' above: Ensure relevant regulatory permits and licences are identified, obtained, and complied with for each Land Development Package (Urbex) and/or Design Package (Empower).	- Record of communication advising on the location of the Legal Registers - Record of Training - BMD Legal Register and HSEQ Steering Committee Minutes - HSEQ Minutes of legislation changes - Record communication of changes - Training schedule and attendance register - Training schedule and attendance register - Record of Pressure Test information and reports - Permit and Licence Register - Permit and Licence Register

Objective	Element	Outcome to be achieved	Practical actions	Possible Evidence
	Stay current with new legal and regulatory developments	Key Personnel should seek regular updates and advice on regulatory developments. Key Personnel should be personally satisfied that appropriate steps are being taken by BMD to comply with any changes that affect or may affect the relevant operations.	All - BMD is provided with regular Regulatory updates sourced from Workplace Safety Australia and Environmental Australia Pty Ltd, and regulatory bodies reviewed by both relevant Group Functional Manager identifying: - Pending Legislation changes - Impacts to the Business - Actions required. - This information is also provided to HSEQ Steering Committee members for review agreed of required actions and further communicated across the BMD Group (as appropriate). - Legislation Updates supplied to Operational Senior Management for review and further communicated across the BMD Group (as appropriate). - Appointment of Functional Leads for both Safety and Environment, who are to attend relevant forums to keep updated with regulatory developments.	- Storage of Alert, record of further circulation and changes to documentation - HSEQ Steering Committee minutes and System Updates - Record of Legislation Update circulation - Record of Position Description and attendance of Regulatory forum
Identify available measures to control risks	Policies	Review BMD's Safety, Environmental and Quality Policies to assess whether the Key Personnel are in agreement that they: - are properly documented, maintained and accessible to all relevant persons - are appropriate to the nature and scale of the operations and the operational risks - include a commitment to develop and implement measurable safety, environmental and quality objectives and targets towards continuous improvement aimed at the elimination of work-related incident, injury (physical and psychosocial) and illness - include a recognition of and commitment to comply with relevant legislation and other requirements applicable to BMD's operations - are effectively communicated to all employees and Contractors where relevant - will be subject to periodic review to ensure they remain relevant and appropriate to the operations of BMD. Where Key Personnel hold concerns about the adequacy of the policies, concerns must be raised to appropriate personnel to remedy the deficiency.	All - BMD's Safety, Environmental and Quality Policies to be approved by Group Board Chairman and Group Executive Director – Operations. - Key Personnel to be provided with and promote BMD's Safety, Environmental and Quality Policy. - BMD Safety, Environmental and Quality Policies to communicate to all BMD employees. - Annual review on effectiveness of BMD's safety, environmental and quality management system plus access to all annual self-assessments and audit results (abridged and prioritised as appropriate) against the management system. - The General Manager – Systems is to be responsible for: - ongoing implementation of Policies - review and update of Policies, Standards and Core Operating Procedures (COPs) - addressing any concerns raised about Policies - reporting to Key Personnel that the above process is happening and when any key issues arise about policies - Setting of Objectives and Targets for the BMD Group through the HSEQ Steering Committee.	- Signed copy of Policies - Copies of communication - Record of BMD Staff Induction and BOLT modules - External (Third Party) Surveillance and BMS Team System (Second Party) Audits - Policies, Standards and COPs updated to reflect Legislation changes - Record of HSEQ Steering Committee meeting minutes and updated document - Monthly HSE and Quality Overview reports and records of review meetings

Objective	Element	Outcome to be achieved	Practical actions	Possible Evidence
			BMD Urban / Constructions and JMac In conjunction with the above: - All Business Unit's General Managers to ensure: - BMD policies are communicated to all site employees including Contractors - Implementation and monitoring Objectives and Targets for the BMD Group. Urbex / Empower In conjunction with BMD Group, all General Managers are to ensure: - BMD Policies are communicated to all personnel - Setting, implementation and monitoring Objectives and Targets.	- Record of meeting minutes - Induction and BOLT module records - Record of Monitoring - Record of meeting minutes - Induction and BOLT module records
	Training	Become familiar with the minimum safety, environmental and quality related training requirements for key activities and roles (for example the requirement for Contractors to receive site induction training and specific online training). Information should then be sought about the training programs which are provided to BMD's employees. Key Personnel should be in agreement that: - employees and contractors receive sufficient training to make them aware of their Safety, Environmental and quality obligations - employees in safety, environmental or quality critical roles receive appropriate specialist training - that training is provided by appropriately skilled and qualified persons - any legally prescribed training has been provided as required - there is an appropriate system for assessing the attainment of necessary competencies and licenses and that these remain up to date. Key Personnel should also be satisfied that the resources are used appropriately and in proportion to the particular nature of the safety, environmental and quality risks. Training requirements of Contractors should be contained within the Contractor Management System (CMS) or alternatively by the relevant Project.	All - Key Personnel will be provided with a location and access of the training requirements and competencies records for different categories of roles within BMD and their Contractors. - All BMD staff to attend Group Induction and complete BOLT modules which provide an awareness of their Safety, Environmental and Quality obligations. - All specialist or legally prescribed training for various positions is arranged and monitored by BMD Group Human Resources (HR) team. - BMD personnel training needs and record of competency to be managed through HR with project accessing information through the BMD Foreman's App. - Contractor personnel training needs and record of competency to be managed through the use of Contractor Management System (CMS), with project accessing information through the BMD Foreman's App or alternatively managed at a Project/Business Unit level. BMD Urban / Constructions and JMac In conjunction with the above: - All project employees including Contractors are to complete a BMD Induction and nominated BOLT modules which provide an awareness of their Safety, Environmental and Quality obligations. - Project Managers to ensure that personnel have required training and competency to prior undertake the task, this information is to be recorded in either the BMD Training or CMS databases.	- BMD training database, CMS, and Foreman App - Record of BMD Induction and BOLT modules - Record of Completion or Attainment - Audit of BMD personnel training records - Audit of Contractor personnel training records and qualification - Record of BMD Induction and BOLT module - BMD training Database, CMS, and Foreman App.
	Resourcing	Key Personnel should be aware of and satisfied with the level of resources allocated to managing Safety, Environmental and Quality risks. Such resources include: - human resources personnel - specialist safety, environmental and/or quality personnel or committees - safety, environmental and quality systems, or technology (including records management)	All - Prepare organisational chart showing Safety, Environmental and Quality resourcing, and reporting lines. - Appointment of Safety, Environmental and Quality Functional Managers. - Safety, Environmental and Quality resourcing including personnel technology and financial requirements to be identified through Business Unit and resourcing reports through budget and tendering process.	- Organisation Chart - BMS team Organisation Structure - Resourcing review and tenders

Objective	Element	Outcome to be achieved	Practical actions	Possible Evidence
		financial resources.	Relevant Key Personnel responsible for receiving reports and acting on resourcing requests to communicate relevant matters to other Key Personnel in the SLG/CLT meetings.	SLG and CLT Reports
	Consultation	Key Personnel should ensure they are informed or make enquiries that enable them to be satisfied that: - there is a system in place for communicating and consulting with workers about HSEQ issues (e.g., designated work groups have been established; Health and Safety Representatives have been elected) - there is an issue resolution procedure in place - the system effectively responds to the issues raised in a manner that ensures workers have an opportunity to contribute to decisions, monitors and keeps workers informed of the progress made - the system incorporates or is linked to a procedure for resolving any issues or disputes with workers - the consultation and issue resolution system comply with minimum legislative requirements.	All - Group Functional Manager - Safety, Environment and Quality to ensure the documented HSEQ consultation process is kept up-to-date and implemented. - Issue resolution process is outlined in the HSEQ Communication Management standard (Section 6.8) and communicated. - All Business Unit's nominated representatives to attend the monthly HSEQ Steering Committee and provide any feedback or issues raised by other HSEQ forums. - All BMD staff to be trained in HSEQ Communication Management standard. BMD Urban / Constructions and JMac In conjunction with the above: - Project Managers should ensure these consultation processes as detailed in the HSEQ Communication Management standard are in place, in particular the coordination and interface with BMD and all Contractors. Unresolved Issues are to be escalated to HSEQ Steering Committee for resolution. - Project Managers shall ensure pre-start meetings are performed every workday prior to commencing work, and toolbox talks are held on a weekly basis. Both forums allow all of the workforce, including Contractors, to be provided with information and allow feedback to be obtained and issues raised. All project employees (including Contractors) to be trained in the HSEQ Communication Management standard.	- HSEQ Communication Management Standard - HSEQ Steering Committee Minutes - HSEQ Steering Committee Minutes - Records of BOLT Training - Minutes of HSEQ and Project Committee meetings - Records of Pre-start and Toolbox Talk minutes - Records of BOLT Training
	Contractor Management	Key Personnel should ensure they are informed or make enquiries that enable them to be satisfied that: - there is a mechanism in place for identifying when the BMD and other Contractors are likely to have concurrent HSEQ duties and that systems are in place to ensure there is adequate consultation, cooperation, and coordination of activities with those persons as appropriate - site requirements and induction requirements are being met in relation to contractors and other visitors - processes are in place for BMD's selection of Contractors.	All - Group Functional Managers - Safety, Environment and Quality should be responsible for ensuring processes are in place for identifying principal in control of project site and also for contractor selection and management. - Key Personnel should be aware of the Subcontractor HSEQ Management standard. - All Business Unit's General Managers to ensure all projects understand the Subcontractor HSEQ Management standard (including the escalation of any contractor's major non-compliance). BMD Urban / Constructions and JMac In conjunction with the above: - All Business Unit's General Managers are to ensure monitoring and review of all projects for compliance that the Subcontractor HSEQ Management standard is in place, which includes: - Completion of Pre-award evaluation and meetings - Site specific and induction requirements - Use of CMS and Plant Assessor - Escalation of any Contractor's major non-compliance.	- Subcontractor HSEQ Management standard - BOLT module - Internal Project Audit - Internal audit and review of contractor records - HSEQ Evaluations - Induction Records - CMS and Plant Assessor records - Contractor NCR's

Objective	Element	Outcome to be achieved	Practical actions	Possible Evidence
Receiving and responding to incidents, identified hazards and risks	Active risk identification processes	Key Personnel should be satisfied that processes have been effectively implemented to identify safety (physical and psychosocial), environmental hazards and quality products and services conformity to assess and manage the risks arising from them (for example, operational audits, Job Hazard Analysis (JHA), Work Method Statement (WMS), and Safety, Environmental and Quality Management Plans). Key Personnel should be satisfied that the processes are adequate and sufficient to ensure that risks are promptly identified and managed appropriately.	All - Group Functional Managers - Safety, Environment and Quality should be responsible for ensuring processes are in place and kept up to date for identifying and effectively managing risks. - Key Personnel should be aware of the Risk Management standard. - All Business Unit's General Managers are to ensure training of all relevant Project Personnel is conducted, also the ongoing monitoring and review for compliance, of the Risk Management standard. BMD Urban / Constructions and JMac In conjunction with the above: - All Business Unit's General Managers are to ensure training and monitoring for compliance of all projects with that the Risk Management standard is in place which includes: - Management Plans - Construction Method Statements (as applicable) - Risk Register - Work Method Statements (WMS) - Job Hazard Analysis (JHA) card.	- Risk Management standard - BOLT module - Internal Project Audit - Internal audit and review project records
	Specific industry requirements	Key Personnel should be aware of the particular requirements of safety and environmental related legislation and codes of practice regulating particular industries within which BMD is involved. Key Personnel have information about the measures in place to ensure that BMD complies with these requirements (e.g., competency standards or accreditation requirements, specific risk management documents, health, and safety management plans) and communicate this as applicable. If there is a lack of understanding about the scope and nature of the requirements or that the requirements are not being properly met, escalation of the matter and/or sourcing of internal legal advice must occur.	All - BMD is provided with regular Regulatory updates sourced from Workplace Safety Australia and Environmental Australia Pty Ltd and regulatory bodies and reviewed by both relevant Functional Leads identifying: - Pending Legislation changes and code of practices - Impacts to the Business - Actions required. - This information is also provided to HSEQ Steering Committee members for review, agreement of required actions and further communicated across the BMD Group (as appropriate). - The General Manager – Systems is responsible to update and implement any relevant documentation with identified changes and agreed actions. - Appointment of Functional Managers for both Safety and Environment, who are to attend relevant forums to keep updated with regulatory developments. - All Business Unit's General Managers to train and monitor compliance of all relevant projects' personnel in their understanding of all implemented documentation changes.	- Circulation of any changes to Legislation, also changes to documentation - HSEQ Steering Committee minutes - Record of Document Update and circulation - Record of Position Description and attendance/ involvement of Regulatory forum - Record of advice and internal audits.
	Accountabilities and escalation	Information should be sought about the chain of escalation for managing HSEQ risks that are identified. Key Personnel should be satisfied that the arrangements in place will trigger the involvement of an appropriate level of seniority to ensure the issue is dealt with effectively and efficiently.	All - Group Functional Managers - Safety, Environment and Quality should be responsible for ensuring processes are in place and kept up to date for identifying and effectively managing incidents, identified hazards and risks. - Key Personnel should be aware of the Incident & Accident Management standard. - All Business Unit's General Managers to train and monitor compliance of all relevant projects' personnel in their understanding of the Incident & Accident	- Crisis Management and Incident & Accident Management standards - BOLT module - Internal Project Audit

Objective	Element	Outcome to be achieved	Practical actions	Possible Evidence
			Management standard. - Organisational chart showing Group, Business Unit's, and Project's HSEQ resourcing and reporting lines. BMD Urban / Constructions and JMac In conjunction with the above: - All project employee, including contractors, are to complete a BMD Induction and/or nominated BOLT modules which provide an awareness of Incident management and response protocols. - All project employees, including contractors, are to be provided with Project specific awareness in Emergency and Incident management. - Review the comprehension of the Emergency and Crisis Management processes, and management of a serious/crisis situation via the performance of a scheduled "Pressure Test Drill".	- Organisational structure and Charts - Record of BOLT and Induction training - Record of Induction training and Emergency Drill conducted - Record of Pressure Test information and reports
HSEQ Performance	Reporting incidents and compliance with notices issued	Key Personnel must be satisfied that there are adequate systems in place to ensure that: - any safety and environmental related incidents are reported internally and investigated in accordance with an established investigation response procedure - that where required they are reported, by appropriate BMD personnel, to the relevant regulator within required timeframes - any regulatory notices issued are brought to the attention of relevant Operational Senior Managers and Key Personnel and actioned in accordance with developed procedures.	All - Group Functional Managers - Safety and Environment should be responsible for ensuring processes are in place and kept up to date for identifying and effectively managing safety and environmental incidents and compliance with notices issued. - Key Personnel should be aware of the Incident & Accident Management Standard. - All Business Unit's General Managers are to ensure training is conducted, also the ongoing monitoring and review for compliance, of all relevant Projects Personnel in their understanding of the Incident & Accident Management standard. - Organisational chart showing Group, Business Unit's and Project's Safety and Environmental resourcing and reporting lines. BMD Urban / Constructions and JMac In conjunction with the above: - All project employees, including contractors, are to complete a BMD Induction and/or nominated BOLT modules which provide an awareness of Incident management and response protocols. - All project employees, including contractors, are to be provided with Project specific training in Emergency and Incident management.	- Crisis Management and Incident & Accident Management standards - BOLT module - Internal Project Audit - Organisational / Project structure and Chart - Record of BOLT and Induction training - Record of Induction training and Emergency Drill conducted
	"Lagging indicators"	Information should be sought about the statistical information collected by the company or operating entity relating to prior (or "lagging") safety and environmental performance. This will typically include: - information on incidents (qualitative) - information on the frequency of total recordable injuries including lost time due to injuries, and Environmental Class 1 and 2 incidents	All - Group Functional Managers - Safety, Environmental and Quality should be responsible for ensuring processes are in place and kept up to date for effectively managing record keeping and the generation of statistical data. - Key Personnel should be aware of the Incident & Accident Management standard.	- Incident & Accident Management standard, database and HSE and Quality Overview reports - BOLT module

Objective	Element	Outcome to be achieved	Practical actions	Possible Evidence
Verifying compliance		(quantitative) - High Potential Incidents - timely close-out of both improvement & corrective actions from audits, complaints, feedback, &/or investigations.	All Business Unit's General Managers to ensure training is conducted, also ongoing monitoring and review, for compliance of all relevant Projects Personnel in their understanding of the Incident & Accident Management and Audit Management standards, database, and generation of statistical reports.	Internal Project Audit, HSE and Quality Overview reports
	"Leading indicators"	Information should be sought with a view to assessing the likelihood of future incidents and the preparedness and capability of BMD to manage them if they arise. The predictors of BMD's future HSEQ performance ("lead indicators") will need to be appropriate to BMD, but may include: - details of time taken to address any identified safety (physical or psychosocial) or environmental risks - near hits - inspections - regulatory activity (e.g., notices issued) - number of, and information contained in, Activity Based Conversations (ABCs) - audits are programmed, resourced, and completed as scheduled.	All - Group Functional Managers - Safety, Environment and Quality should be responsible for ensuring processes are in place and kept up to date for effectively managing record keeping and the generation of statistical data. - Key Personnel should be aware of the Management Systems Objectives and Targets plan. - All Business Unit's General Manager to ensure training is conducted, also ongoing monitoring and review, for compliance of all relevant Projects Personnel with the Management Systems Objectives and Targets plan, databases and generation of statistical reports. BMD Urban / Constructions and JMac In conjunction with the above: - All project management and supervisory staff, including contractors, are to be aware and monitored for compliance with positive indicators requirements detailed in the Management Systems Objectives and Targets plan.	- Management Systems Objectives and Targets Plan and HSE and Quality Overview reports - BOL I module - Internal Project Audit and HSE and Quality Overview report - BOLT training - HSEQ Leadership Commitment – Scheduler and HSE and Quality Overview reports
	Record Management	Key Personnel should enquire and be satisfied that BMD have in place an appropriate record keeping protocol that ensures there is a coordinated approach to the management of HSEQ related information including communications, report, assessment etc. particularly in relation to: - risk identification, assessment, and control - training - consultation - coordination with contractors - investigation of any incidents - the risks and opportunities that can affect conformity of products and services - the ability to enhance customer satisfaction are determined and addressed.	All - Management of HSEQ documents overseen by Group Functional Managers – Safety, Environment or Quality and stored in SharePoint. - Significant changes/updates to HSEQ documents are highlighted and communicated through the HSEQ Steering Committee, and BOLT modules.	- Updated HSEQ documents - Record of meeting minutes, completion of BOLT modules - System Updates - BMS Document Updates
	Follow up	Where HSEQ matters are brought directly to the attention of Key Personnel, they must ensure that any proposed activities to mitigate or remove the risk are taken within a reasonable time frame. Key Personnel should: - specifically seek information about how and when the actions were taken, who was responsible and the effectiveness of the controls; and - be particularly alert to HSEQ issues that appear to be ongoing or reoccurring, as this may be an indication that the planned action is inefficient or has been ineffective (e.g., inappropriately delegated).	All - Group Functional Managers - Safety, Environment and/or Quality to be available to attend at Key Personnel meetings to allow Key Personnel to question and/or seek information on BMD's response to incidents / issues. - Ensure the HSEQ Communication Management standard is utilised for any concerns/issues raised and addressed by relevant Key Personnel. - Nominated personnel responsible for verifying compliance with HSEQ issues escalated and provide assistance with the resolution of issues in BMD.	- Meeting minutes - HSEQ Communication Management standard
		Key Personnel should satisfy itself that a process of internal audit has	All	

Objective	Element	Outcome to be achieved	Practical actions	Possible Evidence
	Auditing	been developed and implemented to monitor the effectiveness of the HSEQ management system. At minimum, Key Personnel should be satisfied that: - an appropriate person(s) in a position of management is responsible for (or oversees the conduct of) an annual review of the HSEQ management system, annual assessments, and annual audits - reports of these reviews, assessments and audits are communicated to Key Personnel (prioritised as appropriate); along with any proposed strategies for rectifying deficiencies or for continued improvement.	- Group Functional Managers to oversee auditing and review of system by Internal second party and External third parties. - Outcomes of these audits are to be reported to Key Personnel through SLG/ CLT Reports and HSEQ Steering Committee and communication to Key Personnel periodically.	- Audit Schedule - Audit report - Audits database - CLT report and HSEQ Steering Committee meeting minutes



Position Description – Project Engineer / Site Engineer

Position Title: _____

Reporting To: _____

Location _____

Date: _____

Basic Objective: (the purpose of your role) _____

Key Responsibility: (main duties carried out) _____

Quality

- Responsible to the Project Manager for all site operations and management.
- Undertakes all the functions and responsibilities of the Project Quality Representative (PQR).
- Monitoring performance of all suppliers of products and services including subcontractors.
- Establishment and maintenance of the IPMP.
- Establishment and maintenance of inspection and test plans including the management of inspection and test functions.
- Establishment and maintenance of project identification and traceability procedures including lot registers and other controls to be implemented by project staff, subcontractors and testing service providers.
- Prepare recommendations for project variations including work processes, cost estimates and contract variation negotiations.
- Assessment of project non-conformances including recommendations for corrective and preventative actions and the review of these actions.
- The point of contact for any internal or external audits and to ensure that any issues found as a result of the audit are dealt with in an appropriate and timely manner.
- To assess the project resource requirements.
- Liaise with the Group Systems Manager on issues concerned with the management system.
- Verify implementation of solutions.

- Control further processing/delivery/installation of non-conforming product until deficiencies or unsatisfactory conditions have been corrected.

Environment

- Establishment and maintenance of the project environmental management plans.
- Implement all monitoring and reporting requirements including all regular site inspections to ensure all protection measures are in place and adequate.
- Provision of adequate environmental training to all staff, subcontractors and visitors to the site.
- Liaise with relevant Government bodies and environmental consultants as required.
- Liaise with the Principal on remedial and corrective actions in response to non-conformance.
- Keeping a register of environmental complaints and the subsequent remedial action.

Safety

- Ensure the objectives of the BMD Group WH&S Manual are complied with.
 - Liaise with the Site Supervisor on any special activities, including activities of subcontractors, which may require safety supervision.
 - Ensure that safety is considered in all forward planning in the arrangement, scheduling and operation of labour, materials, plant and equipment.
 - Regularly inspect and monitor the site for potential safety problems.
 - Ensure regular safety audits are carried out.
 - Assist the Project Manager or Foreman on safety issues when required.
 - Development and implementation of emergency procedures.
 - Administer and obey site safety rules.
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Additional Requirements: (duties which fall outside your key responsibilities which need to be carried out ad-hoc) _____



Employee Sign Off

Employee Name	
Employee Signature	
Manager	
Date	