



Australian Government

Comcare

# WORK HEALTH AND SAFETY MANAGEMENT SYSTEM PRE-LICENCE AUDIT TOOL

Auditing self-insurance licence applicants' work health and safety (WHS) management systems and capacity to meet the Safety, Rehabilitation and Compensation Commission's standards for WHS

Read in conjunction with applicable criteria from the National Audit Tool User guide


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# INTRODUCTION

An application for a self-insurance licence will be assessed by the Safety, Rehabilitation and Compensation Commission (the Commission) from information provided in a written licence application, together with information collected in the application evaluation process. For detailed information about the application process, please refer to the Commission's website – [www.srcc.gov.au](http://www.srcc.gov.au)

The 'Pre-Licence Evaluation' of an applicant's Work Health and Safety management system consists of three parts:

Comcare will assess the applicant's past conduct and performance in meeting its obligations in relation to Work Health and Safety management under the law of the Commonwealth or of a State or Territory.

Comcare will assess the information contained in the licence application as to the proposed arrangements for the management of Work Health and Safety to assess the applicant's capacity to meet the Commission's standards.

Comcare will undertake a pre-licence evaluation of the current or proposed Work Health and Safety management system against the requirements of this *Work Health and Safety management system pre-licence audit tool*.

## GENERAL CONDITIONS OF LICENCE AND PERFORMANCE STANDARDS

The general conditions of licence and performance standards form the basis of the Commission's system of outcome-based regulation of licensees. This system has been designed to foster continuous improvement in work health and safety, rehabilitation and claims management through the promotion of management systems that integrate prevention, rehabilitation and claims management into the applicant's core business processes.

While the Commission needs to be satisfied that licence applicants have the capacity to perform effectively against the conditions of licence and performance standards, the Commission expects that this system will also provide applicants with the freedom to manage health and safety issues, in consultation with workers, and in a way which best suits the applicant's business objectives.

Details of the Commission's performance standards and measures for licensees are available on the Commission's website at: [http://www.srcc.gov.au/publications/guidance\\_for\\_employers2/guidance/performance\\_standards\\_and\\_measures\\_for\\_licensees](http://www.srcc.gov.au/publications/guidance_for_employers2/guidance/performance_standards_and_measures_for_licensees)

## CAPACITY TO MEET THE COMMISSION'S STANDARDS FOR WHS

In order to grant a licence, the Commission must be satisfied that the applicant has the capacity to meet its expected standards for management of Work Health and Safety.

This pre-licence evaluation audit tool tests the maturity of the applicants' Work Health and Safety Management System against the Commission's standards; that is, the evaluation assesses whether the applicant has demonstrated its capacity to be conformant with each criteria upon the completion of the Developing/Transitioning Phase of the licence as outlined in the Commission's Licence Compliance and Performance Monitoring framework.

Once a licence has been granted, a licensee is considered to be in the developing phase and has two years from licence commencement in which to work with Comcare and the Commission to develop the necessary systems and frameworks required to meet the Commission's performance standards.

## THE PRE-LICENCE AUDIT PROCESS

The standard pre licence evaluation audit (herein 'audit') process will consist of a review of system documentation and physical system verification across a sample of work sites. Information may be requested to assist with the audit process including reports relating to any previous audits of the Work Health and Safety management system. The audit may also include interviews with workers including the Work Health and Safety manager(s).

## WORK HEALTH AND SAFETY MANAGEMENT SYSTEM PRE-LICENCE AUDIT TOOL

An abridged version of the [National Audit Tool](#) is used to assess the maturity of a PCBU's Work Health and Safety management system against the Commission's standards for Work Health and Safety. The audit tool assesses 50 criteria from the National Audit Tool from five elements:

1. Health and Safety Policy (two criteria)
2. Planning (10 criteria)
3. Implementation (31 criteria)
4. Measurement and evaluation (five criteria)
5. Management Review (two criteria)

*\* Please note that this audit tool and the criterion numbers throughout align with the National Audit Tool. Please reference the [National self-insurer WHS audit tool – User guide](#) for more information.*

## APPLYING THE PRE-LICENCE AUDIT TOOL

The applicant is required to demonstrate that it either currently meets the Commission's performance standards for Work Health and Safety management under the SRC Act, or has the capacity to meet upon commencement of a self-insurance licence. The auditor will examine the available information to identify and assess system implementation and effectiveness. The auditor will provide a rating against each standard as follows:

<b>Conformance:</b> the standard is fully met.
<b>Capacity to meet:</b> there is sufficient evidence to demonstrate how the standard will be met upon licence commencement.
<b>Non-conformance:</b> the standard is not met and there is insufficient evidence to establish and verify how the standard will be satisfied upon licence commencement.

## AUDIT REPORTING

The auditor, conducting the evaluation on behalf of the Commission, will consider the evidence reviewed during the pre-licence evaluation and prepare a draft report identifying how the applicant performed against the audit criteria.

The draft report is initially provided to Comcare where relevant parties will review the report and conduct a quality assurance process to ensure quality of report, accuracy of findings, and jurisdictional consistency.

The applicant will receive the draft pre-licence audit report for comment within 15 working days of the audit. The applicant is required to provide the auditor with comments on the report within 10 working days of receiving the draft. The auditor will consider these comments and finalise the pre-licence evaluation report within 10 working days.

# SCOPE OF AUDIT

<b>Licensee:</b>	
<b>Scope of audit:</b>	<p>has submitted applications to the Safety, Rehabilitation and Compensation Commission (the Commission) for self-insurance licences under the <i>Safety, Rehabilitation and Compensation Act 1988</i>. The purpose of the Work Health Safety (WHS) evaluation was to assess that</p> <p>has the capacity to meet the standards set by the Commission for the work health and safety of employees.</p> <p>The WHS evaluation comprised a review of documentation and discussions with relevant workers.</p> <p>was required to demonstrate that they currently meet, or have the capacity to meet upon commencement of a self-insurance licence, the Commission's performance standards for WHS.</p>
<b>Audit criteria:</b>	<p>This tool comprises 50 criteria combined into five elements as listed below:</p> <p>Element 1. Health and Safety Policies (2 Criteria)</p> <p>Element 2. Planning (10 Criteria)</p> <p>Element 3. Implementation (31 Criteria)</p> <p>Element 4. Measurement and evaluation (5 Criteria)</p> <p>Element 5. Management review (2 Criteria)</p>
<b>Ratings</b>	<p>The findings in the audit report have been classified and marked as follows:</p> <p><b>Conformance:</b> the standard is fully met.</p> <p><b>Capacity to meet:</b> there is sufficient evidence to demonstrate how the standard will be met upon licence commencement.</p> <p><b>Non-conformance:</b> the standard is not met and there is insufficient evidence to establish and verify how the standard will be satisfied upon licence commencement</p>
<b>Dates and locations of audit:</b>	
<b>Auditor(s)/Comcare Representative(s):</b>	
<b>Primary agency contact(s):</b>	
<b>Record of audit:</b>	<p>This report contains a summary of the audit outcomes. A detailed record of the documentation and records sighted, issues observed and auditor comments are retained on the auditor's file.</p>
<b>Acknowledgment:</b>	<p>wishes to acknowledge the cooperation and assistance provided by the management and staff of</p> <p>and thank them for their contribution to the audit process.</p>
<b>Conflict of interest:</b>	<p>The auditor(s) declare that there is no conflict of interest between them and the licensee being audited, nor those people representing the auditee.</p>



# EXECUTIVE SUMMARY

## NON-CONFORMANCE

A number of 'NON-CONFORMANCE' ratings were identified during the audit. They are:

Criterion	NON-CONFORMANCE

## CAPACITY TO MEET

A number of 'CAPACITY TO MEET' ratings were identified during the audit. They are:

Criterion	CAPACITY TO MEET

In summary, for the 50 criteria within the NAT, the outcomes are:

	Number of criteria	% of assessed criteria
Conformance		
Capacity to meet		
Non Conformance		

is invited to discuss any aspect of this audit report with Comcare.

Signed

Auditor name

Date:  /  /

Signed

Comcare representative

Date  /  /

# ELEMENT 1: HEALTH AND SAFETY POLICY

## 1.1 HEALTH AND SAFETY POLICY

- 1.1.1 Senior management, in consultation with all workers and their representatives, shall define and document its policy for, and commitment to, WHS. The policy shall be endorsed and supported by the most senior person within the PCBU, for example, the Chief Executive Officer or Managing Director. The health and safety policy shall be developed consistent with relevant legislative requirements and include a commitment to:
- a) the risk management process and ensure consistency with the nature of workplace activities and scale of health and safety risks
  - b) comply with relevant health and safety legislation and other requirements placed upon the PCBU or to which the PCBU subscribes
  - c) establish measurable objectives and targets for health and safety to ensure continuous improvement aimed at elimination of work-related illness and injury
  - d) provision of appropriate health and safety training to all workers
  - e) the consultation process to ensure all workers are included in decision-making where there is an impact on workplace health and safety
  - f) the dissemination of health and safety information to all workers and visitors to the workplace
  - g) effective implementation of the health and safety policy.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

- 1.1.2 The health and safety policy is available to other interested parties, including regulatory authorities, suppliers, external contractors, and those visiting the workplace.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

# ELEMENT 2: PLANNING

## 2.1 LEGAL REQUIREMENTS AND PRACTICAL GUIDANCE

2.1.1 The PCBU identifies and monitors the content of all health and safety legislation, standards, codes of practice, agreements and guidelines relevant to its operation.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

2.1.2 The PCBU's procedures, work instructions and work practices reflect the requirements of current health and safety legislation, standards, codes of practice, agreements and guidelines.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

2.1.3 Relevant workers in the PCBU are advised of, and have ready access to, current relevant health and safety legislation, standards, codes of practice, agreements and guidelines.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

2.1.4 The PCBU and/or individual satisfy legal requirements to undertake specific activities, perform work or operate equipment, for example:

- a) licence
- b) certificate of competency
- c) notification
- d) registration
- e) approval/exemption
- f) other relevant requirements.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

2.1.5 Changes to health and safety legislation, standards, codes of practice, agreements and guidelines generate a review of existing procedures.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

## 2.2 OBJECTIVES AND TARGETS

2.2.1 Health and safety objectives and targets consistent with the PCBU's health and safety policy are documented, are appropriate to the PCBU's activities, and consider:

- a) legal requirements
- b) standards, codes and guidelines
- c) health and safety hazards and risks
- d) past health and safety performance (as defined by the PCBU's system requirements)
- e) technological developments
- f) leadership and worker participation.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

2.2.2 Specific health and safety objectives and measurable targets have been assigned to all relevant functions and levels within the PCBU.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

2.2.3 The PCBU sets health and safety performance indicators that are consistent with its objectives and targets.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

## 2.3 HEALTH AND SAFETY MANAGEMENT PLANS

2.3.1 In addition to defining the means by which the PCBU will achieve its objectives and targets, the health and safety management plan(s):

- a) responds to legal requirements
- b) is based on an analysis of information relevant to the nature of the PCBU’s activities, processes, products or services
- c) takes account of identified hazards and health and safety management systems failures
- d) aims to eliminate or reduce workplace illness and injury
- e) defines the PCBU’s priorities
- f) sets timeframes
- g) allocates responsibility for achieving objectives and targets to relevant functional levels
- h) states how the plan will be monitored.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

2.3.2 The PCBU monitors their progress towards meeting the objectives and targets set in the health and safety management plan and takes corrective actions to ensure progress is maintained.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

## ELEMENT 3: IMPLEMENTATION

### 3.1 STRUCTURE AND RESPONSIBILITY—RESOURCES

3.1.1 Financial and physical resources have been identified, allocated and are periodically reviewed, to enable the effective implementation of the PCBU's health and safety management system.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

3.1.2 There are sufficient qualified and competent workers to implement the PCBU's health and safety management system as identified through documented review.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

### 3.2 STRUCTURE AND RESPONSIBILITY—RESPONSIBILITY AND ACCOUNTABILITY

3.2.1 Senior management understands the PCBU's legal obligations for health and safety and can demonstrate how they fulfil them.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

3.2.2 A member of senior management or the board of directors has been allocated overall responsibility for the health and safety management system and reports to that group on its performance.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

3.2.3 The specific health and safety responsibilities (including legislative obligations), authority to act and reporting relationships in the PCBU have been defined, documented and communicated.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

3.2.4 Where contractors (workers) are utilised in the PCBU, the health and safety responsibilities and accountabilities of the PCBU and the contractor(s) have been clearly defined, allocated and communicated within the PCBU and to the contractor(s) and their workers.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

## **3.3 STRUCTURE AND RESPONSIBILITY—TRAINING AND COMPETENCY**

3.3.1 The PCBU consults with workers to identify their training needs in relation to performing their work activities safely.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

3.3.2 A documented training plan(s) based on training needs shall be developed and implemented.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

**3.3.3 The PCBU trains workers (as appropriate) to perform their work safely, and verifies their understanding of that training.**

<b>Finding</b>	
<b>Evidence</b>	
<b>Comment</b>	
<b>Capacity to Meet</b>	
<b>Non-Conformance</b>	

**3.3.4 The PCBU has an induction program for all workers including management which is based on their likely risk exposure and provides relevant instruction in the PCBU's health and safety policy and health and safety procedures.**

<b>Finding</b>	
<b>Evidence</b>	
<b>Comment</b>	
<b>Capacity to Meet</b>	
<b>Non-Conformance</b>	

**3.3.5 Training and assessment is delivered by competent persons with appropriate knowledge, skills and experience.**

<b>Finding</b>	
<b>Evidence</b>	
<b>Comment</b>	
<b>Capacity to Meet</b>	
<b>Non-Conformance</b>	

**3.3.6 The specific requirements of tasks are identified and applied to the recruitment and placement of workers, and tasks are allocated according to the capability and level of training.**

<b>Finding</b>	
<b>Evidence</b>	
<b>Comment</b>	
<b>Capacity to Meet</b>	
<b>Non-Conformance</b>	

3.3.7 Management has received training in health and safety management principles and practices appropriate to their role and responsibilities, and the relevant health and safety legislation.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

### **3.4 CONSULTATION, COMMUNICATION AND REPORTING— CONSULTATION**

3.4.1 Workers or their representatives are involved in the development, implementation and review of procedures for the identification of hazards and the assessment and control of risks.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

### **3.5 CONSULTATION, COMMUNICATION AND REPORTING— COMMUNICATION**

3.5.1 The PCBU regularly communicates to workers the progress towards the resolution of health and safety disputes.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

### **3.6 CONSULTATION, COMMUNICATION AND REPORTING— REPORTING**

3.6.1 Workplace injuries, illnesses, incidents, health and safety hazards, dangerous incidents and systems failures are reported and recorded in accordance with relevant procedures.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

**3.6.2** Where there is a legislative requirement, injuries, illnesses, incidents and dangerous incidents are notified to the appropriate authorities within the stipulated timeframes.

<b>Finding</b>	
<b>Evidence</b>	
<b>Comment</b>	
<b>Capacity to Meet</b>	
<b>Non-Conformance</b>	

**3.6.3** Regular, timely reports on health and safety performance—including reports against health and safety objectives, targets and management plans—are produced and distributed within the PCBU.

<b>Finding</b>	
<b>Evidence</b>	
<b>Comment</b>	
<b>Capacity to Meet</b>	
<b>Non-Conformance</b>	

**3.6.4** Reports of audits and reviews of the health and safety management system are produced and distributed within the PCBU.

<b>Finding</b>	
<b>Evidence</b>	
<b>Comment</b>	
<b>Capacity to Meet</b>	
<b>Non-Conformance</b>	

**3.6.5** The PCBU's annual report or an equivalent document includes information about health and safety performance.

<b>Finding</b>	
<b>Evidence</b>	
<b>Comment</b>	
<b>Capacity to Meet</b>	
<b>Non-Conformance</b>	

### 3.7 HEALTH AND SAFETY RISK MANAGEMENT PROGRAM

3.7.1 The PCBU documents its methodology to reduce health and safety risks through hazard identification, risk assessment and development of risk control measures in accordance with the 'hierarchy of controls' and legal requirements.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

3.7.2 The PCBU has identified the hazards, including public safety hazards that are associated with its activities, processes, products or services, and has assessed the risks involved and implemented suitable control measures in accordance with the PCBU's methodology.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

3.7.3 The PCBU documents all identified hazards, risk assessments and risk control plans.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

3.7.4 Risks of identified hazards are assessed in consultation with workers having regard to the likelihood and consequence of injury, illness or incident occurring, taking into consideration:

- a) legal requirements
- b) evaluation of available information
- c) records of incidents, illness and disease
- d) potential for emergency situations.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

3.7.5 The level of risk is assessed and used to prioritise the implementation of risk control measures.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

3.7.6 Hazard management methodology and associated procedures shall be reviewed and revised where necessary to ensure relevance, adequacy and compliance with health and safety management system requirements.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

### 3.8 HAZARD IDENTIFICATION, RISK ASSESSMENT AND CONTROL OF RISKS

3.8.1 The ability to meet health and safety requirements is assessed in the selection of contractors and labour hire workers (workers).

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

3.8.2 Temporary workers health and safety performance is monitored and reviewed to ensure continued adherence to the PCBU's health and safety requirements or specifications.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

3.8.3 The PCBU has a program for the safe use, handling, transfer, inventory management and transport of hazardous chemicals.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

3.8.4 The PCBU has a program to effectively manage the safety of workers when working at workplaces not under the control of the PCBU.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

## 3.9 EMERGENCY PREPAREDNESS AND RESPONSE

3.9.1 Potential emergency situations have been identified and an emergency plan is:

- a) developed for the PCBU and its workplace
- b) in accordance with legislative requirements
- c) regularly reviewed.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

## ELEMENT 4: MEASUREMENT AND EVALUATION

### 4.1 MONITORING AND MEASUREMENT—GENERAL

4.1.1 There is a health and safety inspection, testing and monitoring program that incorporates timely and effective corrective action processes.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

### 4.2 INCIDENT INVESTIGATION, AND CORRECTIVE AND PREVENTIVE ACTION

4.2.1 Corrective actions are:

- a) implemented in a timely manner
- b) undertaken in consultation with affected workers
- c) assessed for their effectiveness by assigned workers.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

### 4.3 HEALTH AND SAFETY MANAGEMENT SYSTEM AUDITS

4.3.1 There is a health and safety management system audit program to verify the effectiveness of the PCBU's health and safety management system requirements. The audit program takes into consideration the significance of health and safety risks and the results of previous audits.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

4.3.2 The PCBU conducts scheduled audits to verify that:

- a) workplace activities comply with health and safety procedures
- b) procedures are properly implemented and maintained and
- c) procedures are effectively implemented across the PCBU.

<b>Finding</b>	
<b>Evidence</b>	
<b>Comment</b>	
<b>Capacity to Meet</b>	
<b>Non-Conformance</b>	

4.3.3 Deficiencies highlighted by the audits are prioritised and progress is monitored to ensure corrective action is implemented.

<b>Finding</b>	
<b>Evidence</b>	
<b>Comment</b>	
<b>Capacity to Meet</b>	
<b>Non-Conformance</b>	

# ELEMENT 5: MANAGEMENT REVIEW

## 5.1 MANAGEMENT REVIEW

5.1.1 The PCBU has a health and safety management system review program to ensure the continuing suitability and effectiveness of the system. The review program is undertaken with senior management and officers and takes into account:

- a) health and safety management system audit results
- b) objectives, targets and performance indicators
- c) changing circumstances
- d) opportunities for continuous improvements.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	

5.1.2 Recommendations arising from health and safety management system reviews generate actions to improve performance and those actions are implemented.

Finding	
Evidence	
Comment	
Capacity to Meet	
Non-Conformance	