

## **Enforceable undertaking given by:**

### **Commonwealth of Australia as represented by the Department of Defence to Comcare for the purpose of clause 2 of Schedule 2 of the Occupational Health and Safety Act 1991**

#### **Purpose**

- 1 The commitments articulated in this Undertaking are enforceable undertakings given in accordance with clause 16 of Schedule 2 of the Act, to Comcare in fulfilment of obligations under the Act. This Undertaking is given as a consequence of and in mitigation of the Alleged Contravention, and as evidence of the remedial action and future safety commitments that are proposed and outlined in this Undertaking.

#### **Background**

- 2 Defence consists of a number of legally distinct organisations. The three most significant are:
  - (a) The Department of Defence (DOD) – a department of State headed by the Secretary with approximately 14,500 Australian Public Service (APS) personnel;
  - (b) The Australian Defence Force (ADF) – consists of three Services (including Reserves) and is headed by the Chief of the Defence Force (CDF) comprising some 13,200 Navy, 27,800 Army, 14,000 Air Force and 20,200 Reserve personnel. Service Chiefs also administer their respective Cadet Service although the Cadet Service is not a component of the parent Service; and
  - (c) The Defence Materiel Organisation (DMO) – a prescribed agency under the Financial Management and Accountability Act 1997, headed by its Chief Executive Officer (CEO) with some 4,600 APS, 350 Navy, 490 Army, 840 Air Force and 150 Reserve personnel.
- 3 Relevantly, the ADF is an emanation of the Commonwealth and an employer as defined in section 5 of the Act.
- 4 The mission of Defence is to defend Australia and its national interests. Defence is the largest Commonwealth land owner and has environmental stewardship over almost 3 million hectares of land with more than 700 leased or owned properties containing more than 25,000 built assets.

- 5 Within Australia, Defence operates across approximately 1,300 sites and conducts activities in every State and Territory. Defence activities cover the land, sea and air environment. Activities undertaken by Defence are both local and international and there is a unique diversity of work environments, locations and workforce arrangements. Challenging and realistic operational training is essential for developing and maintaining the capability of Defence personnel for active duty.

## Incident

- 6 A Special Forces Military Roping Course (the Roping Course) was conducted at Mt Arapiles in Victoria on 4-16 March 2008. One of the participants, a Special Forces Reservist (the Reservist), suffered serious injury, including a broken left ankle during a night rappelling training exercise on 14 March 2008 (Descent Activity).
- 7 The Roping Course activities on 13 and 14 March 2008 included a daytime ascent of the face of a cliff; a rappel down the face; and later on, the Descent Activity.
- 8 The Descent Activity occurred at night and required the Reservist to rappel a cliff face that was approximately 100 metres high.
- 9 Two descent lines were required to be established at the top of the Cliff face in order to conduct the Descent Activity. Each descent line was required to:
- (a) be safely anchored at the top of the cliff face; and
  - (b) safely rappel to the bottom of the cliff face.
- 10 A rigging party had previously prepared the descent lines but it was incorrectly assumed that the anchoring system that had been deployed was the same as that which had been used for earlier rappelling activities.
- 11 Differently to what had been done previously, on 13 March 2008, the anchorage system on 14 March 2008 did not use a separate length of rope for the anchor. As such, the full length of the descent rope was not available for the rappel down the cliff face. Unknown to instructing staff, the different anchoring system meant that the bottom of the rope was now short of the ground. Instructing staff thought that the reason the rope was not observed to reach the ground was because it had become snagged on the cliff.
- 12 At no time prior to the Incident in the evening of 14 March 2008 and after the descent ropes had been established did the Roping Course supervisors/instructors:
- (a) instruct any person to act as a "brake-man" for the Roping Course during the Descent Activity;<sup>1</sup>
  - (b) rappel either of the descent lines they had established to check it prior to use by the Roping Course participants;

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<sup>1</sup> A "brake man" is located at the base of the cliff and can arrest a person's descent by holding the descent rope taught, by causing it to become trapped in a "figure eight" device (or karabiner).

- (c) tie a "stop knot" at the end of either descent rope;<sup>2</sup> or
- (d) otherwise confirm that the descent lines safely reached the bottom of the descent.

- 13 A lack of effective communications existed between instructors who were positioned at both the base and at the top of the cliff. Instructors at the base of the cliff could not discuss the fact that the rope was not observed to touch the ground with instructing staff at the top of the cliff face. A Roping Course supervisor/instructor assumed that the rope had become 'hung up' on the cliff and he also assumed the rope would reach the ground as it had when the Roping Course had conducted rappelling activities previously in the same place.
- 14 The Reservist was the first person to undertake the Descent Activity. The Reservist had not previously completed a night-time rappel. He suffered injury when he fell approximately five to eight metres from the end of the rope to the ground at the base of the cliff face.

#### **Alleged contravention**

- 15 The Report of Investigation found that the Employer had breached its duty of care to employees contained in section 16(1) of the Act, by failing to take all reasonably practicable steps to protect the health and safety of the Reservist on 14 March 2008.
- 16 Based on the findings of the Report of Investigation, as the Roping Course was specifically a dedicated training activity, Comcare allege that:
- (a) Prior to the Roping Course commencing, the Employer undertook a risk assessment and hazard identification process by way of a risk analysis, however the risk analysis document did not set out how the risks there identified were to be managed, controlled or addressed.
  - (b) The Roping Course was not subject to a comprehensive procedure guide or training manual which documented desirable or mandated techniques to be used by military ropers, particularly in training situations. The manual used on the Roping Course (commonly known as the Military Roping PAM) was lacking in specifics and did not address critical issues to ensure the health and safety of participants including:
    - (i) procedures to be followed to ensure that the descent ropes reached to the bottom of a descent;

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<sup>2</sup> "Stop knots" are a device which arrest a person's descent when the knot becomes caught in the figure eight device (or karabiner). "Stop knots" may be useful risk control measure to prevent people falling off ropes when it is difficult to ascertain whether the rope is long enough to reach the ground at the base of a descent.

- (ii) the use of appropriate anchoring techniques for different descent situations;
  - (iii) procedures setting out the division of the tasks and responsibilities of supervisors establishing, setting up or using descent rappel ropes;
  - (iv) mandating that a supervisor should descend first on a newly deployed rappel rope (with due caution) to ensure that it is safe for use;
  - (v) mandating that "stop knots" be tied into the bottom of a descent rope until positive confirmation had been received that the descent rope reached the bottom of the descent.
  - (vi) procedures to be applied to determine the circumstances (if any) in which trainees should be provided with artificial sources of light to ensure they can see what they are doing; and
  - (vii) procedures to be applied to determine when a "brake-man" should be used.
- (c) No unit-level Standing Orders for roping existed prior to the date of the incident (14 March 2008) to:
- (i) establish the roles and responsibilities for officers and safety supervisors involved in roping procedures; or
  - (ii) give guidance in relation to the critical issues referred to at clause 16((b)) above.
- (d) The Employer did not provide the Roping Course supervisors/instructors with functional communication equipment for the purpose of the Roping Course that could be used specifically in remote locations where mobile telephone service could be unavailable or ineffective.

17 Comcare allege that at all relevant times it was reasonably practicable for the Employer to take the following steps to protect the health and safety at work of its employees:

- (a) undertake a risk assessment and hazard identification process by way of a risk analysis for the Roping Course which specified how the risks there identified were to be managed, controlled or addressed which would include ensuring that a Roping Course supervisor/instructor confirmed that the descent line safely reached the base of the cliff;
- (b) provide training and instruction materials mandating comprehensive and universal safe roping procedures for use in the Roping Course, including the critical issues addressed at 16(16(b)) and 16(16(c));
- (c) provide supervisors involved in the Roping Exercise with copies of the training materials and instructions referred to in 17(17(b)) ;

- (d) provide adequate equipment for use in the Roping Course including, but not limited to reliable and instantaneous means of communication between the Roping Course supervisors, instructors and participants.

18 Comcare allege that the Employer did not take these steps and, as a result, contravened sub-section 16(1) of the Act by failing to take all reasonably practicable steps to:

- (a) provide and maintain a working environment (including plant and systems of work) that was safe for the employer's employees and without risk to their health;
- (b) ensure the workplace was safe for the employees and without risk to their health;
- (c) ensure the safety at work of, and the absence of risks at work to the health of, the employees in connection with the use, handling, storage or transport of plant (specifically, the rope) or of substances;
- (d) provide to its employees the information, instruction, training and supervision necessary to enable them to perform their work in a manner that is safe and without risk to their health.

#### **Acknowledgement of obligations under the Act**

19 The Employer acknowledges that:

- (a) it has obligations pursuant to section 16(1) of the Act to take all reasonably practicable steps to protect the health and safety at work of its employees;
- (b) the Report of Investigation identifies an alleged breach of s16(1) of the Act; and
- (c) legal proceedings were contemplated by Comcare to enforce the alleged breach of section 16(1) of the Act identified in the Report of Investigation.

20 The Employer acknowledges and accepts the duty it has under section 16 of the Act. The Employer is committed to fulfilling that duty and it has thus proposed to undertake and complete:

- (a) a restructure of the doctrine, training and procedures associated with Military Roping; and
- (b) a broader scope of training to include adventurous training roping and to include comprehensive internal assurance mechanisms that are set out in the Schedule and include:
  - (i) Independent review of revised doctrine with the Employer being required to consider recommendations and provide a response to Comcare; and

- (ii) Assurance checks by Army's OHS auditing service (ArmySAFE Advisory Service) with invitation for Comcare to attend as external validation to confirm application of the revised doctrine and policy on training courses and in ADF units while conducting continuation training

as part of the restructure to training programs.

21 The Employer has already undertaken many initiatives to prevent a recurrence of the Incident, or similar types of incident, and to address the findings made by the Report of Investigation. Specific initiatives that have been implemented by the Employer since the Incident include:

- (a) ensuring access to current military roping doctrine and training requirements, by:
  - (i) ensuring that all units conducting military roping training apply the requirements of the revised 1st Commando Regiment Standing Operating Procedures (1 CDO REGT SOPs); and
  - (ii) ensuring that the Army's Electronic Doctrine Library website contains a reference to LWP SF 7-1-1 Special Forces Military Roping until LWP-SOF 9-3-2 Roping, Airborne Roping and Climbing is released.
- (b) reviewing the requirement for operational doctrine relating to the use of night vision aids, or other artificial light sources, during the conduct of military roping and incorporate guidance within LWP-SOF 9-3-2 Roping, Airborne Roping and Climbing, if required.
- (c) reviewing the guidance for night vision aids in training and incorporate requirements as necessary.
- (d) re-developing the currently combined Training Management Package (TMP) for Military Roper/Supervisor into separate TMPs for Military Roper and Military Roper Supervisor.
- (e) providing formal counselling to the members who were issued with Letters of Warning and Statutory Obligation by Comcare. This counselling session included an overview of the report of Comcare Investigation 3785 and the adverse findings made against the individual ADF Members in that report. A copy of the relevant letter or the counselling record was placed on the ADF Members' personnel files.
- (f) reviewing the doctrinal information available to non-Special Forces units and ensure that sufficient reference material is available for the conduct of initial, continuation, and refresher Airborne Roping training.
- (g) re-emphasising the primary importance of the safety ethos of 'Can Do Safely' within 1 CDO REGT.

- (h) Commanders at 1 CDO REGT are briefed on the incident with specific focus on the following examples from the incident:
- the apparent failures to resolve a recognised issue with poor communications systems and the apparent acceptance of this liability by personnel; and
  - the potential failure to provide instructors/safety supervisors with sufficient time to prepare adequately for their roles during the training exercise.

## Definitions

22 In this Undertaking:

“the Act” means *the Occupational Health And Safety Act 1991*.

“the Auditor” means the auditor engaged pursuant to Schedule 1.

“the Alleged Contravention” means the facts or circumstances which may have caused or contributed to the incident and any injuries as described in the Report of Investigation and summarised at clauses 6-11 of this Undertaking.

“the Employer” means the Commonwealth of Australia in its emanation as the Australian Defence Force (**ADF**), as represented by Army.

“the Incident” means the Incident described in the Report of Investigation and summarised at clauses 6-14 of this Undertaking.

“Comcare” means the body corporate established by section 68 of the *Safety, Rehabilitation and Compensation Act 1988*.

“this Undertaking” means this document, including Schedule 1 to this document.

“the Report of Investigation” means the report of investigation number 3785 issued to the Employer under section 53 of the Act.

“the Undertaking Date” means the date the Undertaking is to have effect from being the date on which it is executed by Comcare.

## Legal Proceedings

23 Despite the Alleged Contravention, and any admission of liability expressed in this Undertaking, Comcare has agreed not to pursue legal proceedings under the Act in relation to the matters identified in the Report of Investigation on the basis that ADF enters into and complies with this Undertaking.

## **Assurance about future behaviour**

- 24 This Undertaking constitutes an Enforceable Undertaking pursuant to clause 16 of Schedule 2 of the Act.
- 25 This Undertaking is given by the Chief of Army as an authorised representative of the Employer.
- 26 To rectify the Alleged Contravention in relation to Special Forces Military Roping Courses, the Employer has undertaken a restructure of training and procedures associated with Military Roping, as explained at clause 21. In that regard, in relation to Special Forces Military Roping Courses conducted by it, the Employer will:
- (a) Do and ensure that its agents and employees do all things reasonably necessary to prevent a reoccurrence of the Incident or the occurrence of any event similar to the Incident;
  - (b) Abstain, and ensure that its agents and employees abstain, from doing any act, matter or thing which gave rise to, or allegedly gave rise to the Incident or could give rise to the occurrence of any event similar to the Incident; and
  - (c) Ensure that it uses its best endeavours to observe and implement industry best practice in respect of occupational health and safety and in compliance with the Act in relation to the Incident or the occurrence of any event similar to the Incident.
- 27 In addition, the Employer undertakes to do or cause to be done, all things listed in Schedule 1.

## **Occupational health and safety commitments**

- 28 In particular, and without limitation to the generality of the commitments given in this Undertaking, the Employer must do or abstain from doing (as the context requires) all things listed in Schedule 1 to this Undertaking.
- 29 The Employer undertakes to do all of the identified steps listed in Schedule 1 to this Undertaking
- 30 Unless specifically provided otherwise, all acts, measures, programs, or things required to give effect to the Commitments shall be performed, made, or implemented on or before the dates listed in Schedule 1 to this Undertaking.

## **Reporting**

- 31 The Employer must:
- (a) Report to Comcare on two occasions first, by 14 August 2011 and secondly by 1 January 2012 on the development and/or implementation of the measures it has committed to develop and/or implement in accordance with this Undertaking;

- (b) Provide all documents and information requested by Comcare from time to time for the purpose of enabling Comcare to assess compliance with this Undertaking;

### **Publicity**

- 32 The Employer acknowledges that this Undertaking constitutes a public declaration of the Employer's commitment to occupational health and safety and response to the Report of Investigation.
- 33 The Employer:
  - (a) Agrees and undertakes to publish this Undertaking on the internet and intranet sites of the ADF and Department of Defence, and to circulate a brief about this Undertaking to all ADF employees nationwide.
  - (b) Acknowledges that Comcare will:
    - (i) Issue a media release on execution of this Undertaking referring to its terms and to the concerns of Comcare which led to its execution;
    - (ii) Advertise the acceptance of this Undertaking in a Saturday Edition of The Melbourne Age, and The Weekend Australian;
    - (ii) From time to time publicly refer to this Undertaking; and
    - (iii) Make this Undertaking available for public inspection, including by publishing it on Comcare's website.

### **Costs**

- 34 The Employer will pay Comcare costs as agreed.

### **Enforceability**

- 35 The Employer acknowledges that this Undertaking is enforceable at law and that it will be subject to penalties if it does not comply with this Undertaking.
  - (a) Without limiting the generality of this clause, Comcare may, in its absolute discretion, deem any finding by the Auditor that the Employer has failed to give full effect to any provisions of this Undertaking to be a breach of this Undertaking.
  - (b) Without limiting any other power, right, authority, or privilege it may enjoy, Comcare may, in proceedings arising from any breach or anticipated breach of this Undertaking, inter alia:
    - (i) Apply for an injunction restraining any such breach;
    - (ii) Apply for an injunction to ensure compliance with this Undertaking;

- (iii) If no proceedings are on foot, commence proceedings against the employer in respect of the Alleged Contravention or any matters dealt with in the Report of Investigation; and
  - (iv) Apply for any further order it considers appropriate.
- (c) If the Employer actually or proposes to breach, vary, or withdraw this Undertaking then:
- (i) Comcare may pursue legal proceedings; or,
  - (ii) If no proceedings are on foot, commence proceedings against the Employer in respect of the Alleged Contravention resulting from the Incident or any matter dealt with in the Report of Investigation.

And in any such proceedings the Employer may not object to Comcare tendering this Undertaking.

- (d) Any act or omission by the Employer which is inconsistent with or in contravention of this Undertaking is and is deemed by Comcare to be a breach of this Undertaking.
- (e) The Employer acknowledges that it will bear the costs of legal action taken by Comcare in accordance with or pursuant to this clause.

### **Variation or Withdrawal of Undertaking**

- 36 This Undertaking may only be withdrawn or varied with the written consent of Comcare.
- 37 The Employer may submit a request in writing to vary this Undertaking where, for example, compliance with this Undertaking, or an aspect of this Undertaking, becomes impracticable and/or unsustainable or where there has been a material change in circumstances since the Undertaking was entered into.
- 38 If the Employer believes it has fully performed its obligations under this Undertaking prior to the expiration date at clause 40(d), it may submit a written request to have the undertaking withdrawn. The request must be accompanied by a written report detailing how and when the obligations in this Undertaking have been discharged.
- 39 Comcare will consider requests to vary or withdraw this Undertaking and will advise the Employer in writing of its decision.

### **Acknowledgements**

- 40 The Employer acknowledges that
- (a) Comcare's acceptance of this Undertaking does not affect Comcare's:

- (i) Power to investigate or pursue civil or criminal proceedings in respect of similar or related incidents or injuries which occur after the Undertaking date; or
  - (ii) Authorities, powers, and obligations in respect of any conduct of the Employer which is not the conduct which gave rise to the Incident.
- (b) This Undertaking in no way derogates from the rights and remedies available to any other person or entity other than the Employer and Comcare arising from any conduct described in this Undertaking or arising from future conduct.
- (c) This Undertaking has no operative force until accepted by Comcare.
- (d) This Undertaking will be deemed to be formally concluded 12 months from the date of this Undertaking, or when Comcare confirms in writing that the actions set out in Schedule 1 of this Undertaking have been fully completed (whichever is sooner).

41 This Undertaking is given on behalf of the Employer by the Chief of Army who has the authority of the Employer to grant this Undertaking on behalf of the Employer.

I certify that the persons(s) signing opposite, with whom I am personally acquainted or as to whose identity I am otherwise satisfied, signed this document in my presence.

SIMON ANDREW STUART

Name of Witness

[Signature]

Signature of Witness

DCOORD-A  
AHR  
R1-A 8028

Address of witness

RUSSELL ACT 260,

[Signature]

D.L. Morrison  
Lieutenant General  
Chief of Army

[Signature]

Signature of D.L. Morrison  
Lieutenant General  
Chief of Army

26 July 2011

Date signed

Accepted by Comcare pursuant to clause 16 of Schedule 2 of the *Occupational Health And Safety Act 1991* by its duly authorised delegate:



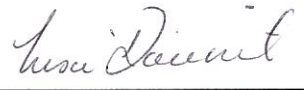
Signature of Deputy Chief Executive Officer

Steve Kubble 27/7/11

Name of Deputy Chief Executive Officer

LISA Downit

Name of witness



Signature of witness

*[Faint handwritten notes and a large oval scribble]*

COMCARE INVESTIGATION 3785 – SCHEDULE 1 TO THE ENFORCEABLE UNDERTAKING

Item	Action(s)	Due Date
1.	Army is to develop a single comprehensive policy for all aspects of <b>military</b> roping training entitled "Army Training Instruction 7-2/2011 - Roping, Airborne Roping, Climbing and Mountain Warfare".	1 August 2011
2.	Army is to incorporate those aspects of the document/procedure entitled "ATI 7-2/05 Airborne Roping" which represent best practice in airborne roping procedure/technique into the policy entitled "Army Training Instruction 7-2/2011 - Roping, Airborne Roping, Climbing and Mountain Warfare".	1 August 2011
3.	Upon completion of item [2], Army is to cancel the document/procedure entitled "ATI 7-2/05 Airborne Roping".	1 August 2011
4.	Army is to incorporate those aspects of the document/procedure entitled "SAFETYMAN Vol 2. Part 3 Chapters 9, 21 and Annexes A, B and C" which represent best practice in military roping procedure/technique into the policy entitled "Army Training Instruction 7-2/2011 - Roping, Airborne Roping, Climbing and Mountain Warfare".	1 August 2011
5.	Army is to develop and release a single doctrine publication for all <b>non-military</b> roping entitled "LWP G 7-6-2 Roping".  The purpose of this doctrine publication is to provide a source for technical information required for <b>non-military</b> roping activities within Army, and that purpose will be made explicit in this publication.	12 December 2011

Item	Action(s)	Due Date
6.	Army is to incorporate those aspects of the document/procedure entitled "SAFETYMAN Vol 2. Part 3 Chapters 9, 21 and Annexes A, B and C" which represent best practice in non-military roping procedure/technique into the doctrine publication entitled "LWP G 7-6-2 Roping".	12 December 2011
7.	Upon completion of items [4], and [6], Army is to cancel "SAFETYMAN Vol 2. Part 3 Chapters 9, 21 and Annexes A, B and C".	12 December 2011
8.	Army is to develop and release a single doctrine publication for all <u>military</u> roping entitled "LWP-SOF 9-3-2 Roping, Airborne Roping and Climbing".	1 August 2011
9.	Upon completion of item [8] Army is to cancel the document/procedure entitled "LWP SF 7-1-1 Military Roping (2002)".	1 August 2011
10.	The combined Training Management Package (TMP) for "Military Ropers and Military Roper Supervisors" is to be separated into two separate TMPs: one applying to 'Military Ropers'; and the second applying to 'Military Roper Supervisors'.	Completed
11.	Army is to ensure that:  (a) "LWP G 7-6-2 Roping";  (b) "Army Training Instruction 7-2/2011 - Roping, Airborne Roping, Climbing and Mountain Warfare";	1 August 2011

Item	Action(s)	Due Date
	<p>(c) "The Training Management Package (TMP) 'Military Roper Supervisors'"; and</p> <p>(d) "The Training Management Package (TMP) 'Military Ropers'".</p> <p>each incorporate the following additional safety measures:</p> <p>(i) During initial roping training (or training involving beginners), a brakeman is to be employed during periods of instruction;</p> <p>(ii) All anchors and anchor systems are to be checked by the Officer in Charge prior to the commencement of any roping activity;</p> <p>(iii) The Officer in Charge of the training activity or safety officers are to check the anchor system periodically throughout the activity;</p> <p>(iv) Any descent lines must be tested/proved by a qualified roper or instructor prior to any descents by trainees;</p> <p>(v) All descent lines must be checked to confirm that the running end of the rope is on the ground; or where no such confirmation can be obtained, a stop knot is tied in the end of that descent line;</p> <p>(vi) Effective safety communications must be established between the top/base of site for all roping activities before the training activity commences, and maintained for the duration of those activities; and</p>	

<b>Item</b>	<b>Action(s)</b>	<b>Due Date</b>
	<p>(vii) Training activities are to cease immediately upon a loss of communications between top/base of site.</p> <p>These measures must be incorporated into these documents prior to their release and implementation.</p>	
12.	<p>Army is to ensure that the document entitled "Army Training Instruction 7-2/2011 - Roping, Airborne Roping, Climbing and Mountain Warfare" contains adequate explanations of:</p> <ul style="list-style-type: none"> <li>(i) the roles and responsibilities of relevant appointments for planning and conducting military ropes training activities (including but not limited to: officer scheduling the activity; officer conducting the activity; safety officer; brakeman etc);</li> <li>(ii) The minimum requirements for relevant briefs (ie general safety brief to all participants, brief from OIC to safety supervisors, and hand-over brief when a change in supervising staff occurs); and</li> <li>(iii) Requirements for qualifications of various positions.</li> </ul> <p>This content must be incorporated into the document entitled "Army Training Instruction 7-2/2011 - Roping, Airborne Roping, Climbing and Mountain Warfare" prior to its release and implementation.</p>	1 August 2011

Item	Action(s)	Due Date
13.	<p>Army is to create the new office of 'Training Authority for Military Roping', and appoint the Commandant of the Special Forces Training Centre to that position.</p> <p>The 'Training Authority for Military Roping' will be responsible for:</p> <p>(i) controlling and managing training, education and development for military roping, in accordance with the doctrine publication identified at items [11] and [14]; and</p> <p>providing officers and soldiers with the skills, knowledge and attitudes required to enable them to successfully and safely complete military roping training and conduct operations.</p> <p>Army will pay for an independent expert agency to review the technical requirements contained within:</p>	1 August 2011
14.	<p>"LWP-SOF 9-3-2 Roping, Airborne Roping and Climbing"</p> <p>to ensure that:</p> <p>(a) It represents best practice in safety for military roping procedure.</p> <p>In conducting this review, the independent expert agency must focus on the safety aspects identified at items [11] and [12] of this Schedule.</p> <p>The independent expert agency will produce a written report based on its review (<b>the Review Report</b>).</p>	7 October 2011

Item	Action(s)	Due Date
15.	<p>Army is to provide Comcare:</p> <p>(a) a copy of the Review Report at item [14] within 5 days of that Review Report being completed; and</p> <p>(b) a Corrective Action Plan from Army (if one is required) outlining the implementation of any necessary changes to the documents/procedures listed at item [14], to address any deficiencies in those documents/procedures that are identified in the Review Report. This must occur as soon as practicable but no later than 60 days after the completion of the Review Report at item [14].</p>	<p>Item 15(a): 14 October 2011</p> <p>Item 15(b): 14 December 2011</p>
16.	<p>The ArmySAFE Advisory Service is to complete an audit of the revised policies and procedures relating to military roping, as identified at items [11] and [14], to ensure that the additional safety measures identified at items [11] and [12] are:</p> <p>(a) being applied within Army units during formal military ropes training courses; and</p> <p>(b) being applied within Army units during continuation training, as necessary.</p> <p>Comcare Monitoring Officers are entitled to accompany ArmySAFE Advisory Service auditors during this audit.</p> <p>ArmySAFE must:</p> <p>(i) prepare a written report of this audit (<b>the ArmySAFE Audit Report</b>); and</p> <p>(ii) within 5 days of completing that report provide it to Comcare in addition to any comments or recommendations ArmySAFE wish to make; and</p> <p>(iii) Within 30 days of Comcare receiving the ArmySAFE Audit Report, Army must also provide Comcare with all necessary or required action plans or recommendations developed in response to any deficiencies identified in the ArmySAFE Audit Report.</p>	<p>Item 16(i): 1 November 2011</p> <p>Item 16(ii): 9 November 2011</p> <p>Item 16(iii): 12 December 2011</p>