

Safety Document Rewrite Case Study

Background

Our involvement in this project came as a result of our earlier work on developing a document management system including templates which used the Information Mapping methodology as the content standard.

In a separate project, the Organisation had identified improving and maintaining the safety of its employees, contractors and stakeholders as a key priority for improvement. One part of this was the review of all safety documentation to:

- encourage engagement through making procedures accessible and simple to understand
- enhance individual capability by making responsibilities clear and actionable
- apply the new corporate templates and standard.

The Challenge

Key issues were that:

- documents contained unnecessary information that was not compliance related or identified as of value by the business
- purpose and audience not clearly defined
- they were not written from a reader-perspective
- did not clearly identify different types of information eg rules vs procedures
- no clear navigation or structure, hard to find information

Scope of work

The Health & Safety Management Framework was developed to implement the corporate Health & Safety policy. The Framework identified 20 elements and detailed the purpose and minimum requirements for each element. Existing procedures, forms, Hazard Guides and Safe Work practices were assigned to these elements.

All Safety documentation was to be reviewed and rewritten according to the requirements and presented in the new format. In total, 138 documents were reviewed, merged and rewritten over 12 months.

The Process

The Safety Improvement team established SME working groups to review and update the existing documents from a content point of view. This “modified” content was then passed to the writer for rewriting and restructuring. The writer produced a final draft version which went back to the working group for finalisation and publication.

In each case, we

- analysed the information in each group of documents identifying the purpose and intended audience
- organised the information into a logical structure that reflected the type of information to be conveyed
- identified gaps and opportunities for improvement
- rewrote the information using the approved templates
- provided a draft for the expert team to finalise.

Before and After Example

The change is best illustrated using the example of information on Working at Heights. This Hazard Guideline was part of the Safe Access and Entry element. The document received from the working group was 21 pages long and complex making it very difficult to understand or find specific information. There were no procedural steps. The After version shows how presenting material using concise language and graphical techniques such as tables improves readability. The information has been interpreted to become more action oriented. The overall process and procedures to follow are now clearly shown.

Hazard Guideline

HEALTH AND SAFETY

Document No : HS000-W0028
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(Minor amendment approved 13 April 2017)

HS000-W0028

BE SAFE HAZARD GUIDELINE 17: WORKING AT HEIGHTS

1.0 PURPOSE

This hazard guideline defines how the Organisation will:

- control the risks associated with accessing and working at heights aimed at preventing injuries to workers and others including the general public, as a result of exposure to the Organisation's working at heights activity
- provide a useful tool for those working at heights and provide practical information to create and maintain a safe system of work when working at heights;
- summarise the key aspects of relevant legislation, codes of practice, standards and guidelines regarding working at heights in the workplace; and
- verify that Organisation sites are compliant with the requirements of the guidance document entitled Industry Safety Steering Committee (ISSC) 34: Guide for Height Safety within the NSW Electricity Supply Industry, June 2013.

2.0 SCOPE

This hazard guideline applies to Organisation's work sites and the activities of Organisation's workers.

The Organisation has adopted the guideline ISSC 34: Guide for Height Safety within the NSW Electricity Supply Industry, June 2013, as the minimum standard for working at heights on network infrastructure and assets, including:

- overhead structures, wires and associated cables;
- substation structures and equipment;
- communication infrastructure; and
- during fleet design, building design or any maintenance work being considered or undertaken involving work at heights.

3.1 ACTIONS

3.2 Background

The Organisation has identified a range of hazards relevant to our workplaces and the tasks we conduct, in accordance with Be Safe Procedure 10: Managing WHS Risk.

Controls within a Be Safe hazard guideline are mandatory, unless prefixed by may or should.

Work at heights is a high risk hazard for workers and can result in serious and fatal injuries, many of which can be prevented using some basic steps.

The Organisation was part of the discussions that were held when the Industry Safety Steering Committee developed the guideline ISSC 34: Guide for Height Safety within the NSW Electricity Supply Industry, June 2013. The intention of this guide is consistent with the intentions of the *Work Health and Safety Act 2011 (WHS Act 2011)*, *Work Health and Safety Regulation 2017 (WHS Regulation 2017)*, the associated SafeWork NSW Code of Practice: Managing the risk of falls at

- surface contamination; and

3.12.8 Tree work

Access for tree work must be carried out in accordance with the SafeWork NSW Code of Practice Amenity Tree Industry, 1998 and must be documented.

3.13 Working at heights

When designing the height safety system, the following elements must be considered:

- the amount of conscious thought and physical effort that workers can reasonably apply to managing their safety at height whilst also undertaking the work process in their elevated work positions; and
- the compatibility of the work process and materials used therein, with the height safety system.

3.13.1 Managing risks of falling objects

Examples of controls for working at heights to manage the risk of falling object should be considered. These may include:

- complying with section 3.7 above;
- keeping large equipment at ground level;
- good housekeeping eg keeping the work area tidy and ensuring materials, debris, tools and equipment that are not being used are out of the way;
- providing a secure physical barrier at the edge of the elevated area, such as toe boards or infill panels that form part of a guardrail system;
- tethering or otherwise securing tools and materials to prevent them falling on people below; and
- keeping tools or other materials away from edges and off railings or sills.

3.13.2 Ladders (working from)

Where possible, an alternative means of working at heights should be considered prior to selecting a ladder.

Three points of contact must be maintained when working from a ladder in accordance with NEG-SE05-02: Safety Equipment - Care, Use and Inspection - Ladders.

Additionally, fall protection measures to be used when working from a portable ladder must be appropriate to:

- type, set up and use of portable ladders; and
- the need to reach out sideways while working.

Note: A suitable means for raising and lowering tools safely and without manual handling risks must be implemented.

A work positioning system must be used when working from a fixed ladder.

3.13.3 Mobile Elevating Work Platforms (MEWPs)

Where a safe system of work at heights includes working from MEWPs the following should be referred to:

- procedures developed and adhered to for Mobilising (Ref: ISSC 34 – section 10.4.3);
- the safe system of work for MEWPs safeguards the working load limit of a MEWP from being

Pro 17: Working at Heights

Purpose

Working at heights presents high risk hazards which can result in serious and fatal injuries.

This document describes the procedures for:

- assessing the risks of accessing, exiting and working at heights
- planning the safety aspects of work performed at heights
- safely accessing elevated work positions
- safely performing work at heights.

Purpose and Contents clearly stated up front

Applies to

The Organisation's workers, and contractors designing network assets,

General Rules

Engineering Controls for Fall Prevention

Where performing work at heights cannot be eliminated or substituted, the following fall prevention equipment and structures should be considered in this order:

- a secure fixed work area to isolate the risk of a fall
- fall prevention devices
- fall arrest systems
- anchorage points.

Rewording removes unnecessary words and highlights the important message.

Secure Fixed Work Area

A secured fixed work area includes the following:

- a safe means of entry and exit capable of supporting personnel, equipment, materials and any other loads required for the performance of the work
- flooring securely fastened so it cannot be dislodged
- mesh, railings or solid barriers around the perimeter and any openings to prevent a person falling
- toe boards or similar means to prevent equipment or materials falling from the edge of the platform.

Process Overview

Process Overview

The working at heights process follows the 4 stages listed below. More detailed procedures for each stage are provided in the following pages.

Overview of the process to aid navigation

Stage	Description
1	Assessing the risk.
2	Prework planning
3	Accessing, exiting and transferring between elevated work positions.
4	Working at or around elevated positions.

Stage 4 Working at or Around Elevated Positions

Principle

Safe systems for working from elevated platforms must be designed with consideration to the amount of conscious thought and physical effort workers can reasonably apply to their safety while completing their work tasks at an elevated position.

Key Steps

Key steps are

Instructions
with clear
action words

Step	Action
1	Ensure the work area is set up in accordance with the pre work plan and a HAC has been conducted.
2	Ensure workers have attended a prework briefing.
3	Ensure appropriate fall prevention controls are in place.
4	Ensure all appropriate PPE is worn.
5	Secure tools and equipment to prevent falls by: <ul style="list-style-type: none"> • keeping large equipment on the ground. • keeping the work area tidy and ensuring materials, debris, tools and equipment not being used are stored safely out of the way. • tethering or securing tools and materials. • keeping tools or materials away from edges and off railings or sills.
6	If the prework plan includes a drop hazard zone, set up the area and appoint an observer.
7	Agree on the method of communication with workers at height, ground workers and the observer.
8	Agree on the rules for entering the drop zone. In general, no person must enter a drop zone unless: <ul style="list-style-type: none"> • Entry is unavoidable. • Time spent in the drop zone is minimised. • Entry into the drop zone has been communicated, agreed with and acknowledged by, the people working above. • An assigned observer is present to observe the work, monitor the drop zone, and ensure effective communication is maintained between workers on the ground and at height.
9	Set up the emergency rescue equipment specified in the prework plan.

Roles and Responsibilities

<div> <div>R</div> <div>The person RESPONSIBLE for doing or delegating the action</div> </div> <div> <div>A</div> <div>The person who has ultimate responsibility and will be held ACCOUNTABLE for the action</div> </div> <div> <div>C</div> <div>The person who must be CONSULTED during the action</div> </div> <div> <div>I</div> <div>The person who must be INFORMED of the action and/or outcomes</div> </div>	Chief Executive Officer	Head of Health and Safety	Managers and Supervisors	Project Officers and Planners of work	Rescue Support	Workers working at height	Safety Managers & Safety Leads	Training Group
	Authority for approving this procedure	A/R	C	I	I	I	I	I
	Endorse this procedure and ensure adequate funding to maintain compliance	A	R	C	C	I	I	I
	Ensure adequate resources, training and appropriate equipment to implement and adhere to this procedure.	I	A	R	I	I	I	C
	Maintain compliance and ensure any legislative changes are incorporated and communicated to affected workers.	I	A	R	I	I	I	I
	Plan the work carried out at height ensuring hazards and risks are controlled.	I	I	A	R	I	I	
	Emergency and rescue responsibilities	A	C	C	I	R	C	I
	Implement a risk management approach when working at heights.	A	C	A	I	C	R	I
	Ensuring the selection and location of anchors conforms to Australian Standards	A	C	R	I	I	R	I
	Working with height safety systems including the provision of rescue systems.	C	C	A	I	I	R	I
	Ensuring access, exit and transfer between work positions is planned and carried out safely	A	I	R	C	I	R	I
	Training and competency requirements of workers involved in working at heights are followed.	I	C	R	I	I	I	A

Table presentation enhances readability