

SAFETY AND HEALTH PROTOCOL

A Tool for Assessing Safety and Health Performance

Purpose

The purpose of the assessment protocol is to provide guidance to facilities in completing their evaluation of safety and health performance against TSM indicators. The assessment protocol sets out the general expectations for safety and health as part of the TSM initiative. This protocol supports the implementation of the MCA safe, healthy and respectful workplaces policy.

As with any assessment of a management system, professional judgement is required in assessing the degree of implementation of a system indicator and the quality of management processes and intervention. Application of this protocol will require a level of expertise in auditing and systems assessment and knowledge of and experience in the practice of safety and health. This assessment protocol provides an indicator of the level of implementation of proactive safety and health practices as part of the TSM initiative. It is not, of itself, a guarantee of the effectiveness of safety and health activities, nor does it represent compliance with any workplace safety and health legal requirements.

Performance Indicators

The Safety and Health Protocol contains five indicators:

1. Commitments and Accountability
2. Planning and Implementation
3. Training, Behaviour and Culture
4. Monitoring and Reporting
5. Performance

INDICATOR 1: COMMITMENTS AND ACCOUNTABILITY

Purpose

To confirm that the facility has established clear accountability for safety and health management and performance, and that safety and health commitments have been established and clearly communicated to employees, contractors and suppliers.¹

Assessment Criteria

Level	Criteria
C	The facility does not meet all Level B criteria.
B	<ol style="list-style-type: none">1. Demonstrated commitment to safe, healthy and respectful workplaces is evident.²2. A senior management representative is accountable for safety and health.3. The company has developed an action plan to meet all Level A requirements.
A	<ol style="list-style-type: none">1. Commitments are defined and authorised by the company's senior management and are consistent with the intent of the MCA Safe, Healthy and Respectful workplaces policy.2. There is a process in place to ensure that employees, contractors, and suppliers who work at the facility are aware of the company's safety and health commitments.3. Accountabilities and responsibilities are understood at all levels.
AA	<ol style="list-style-type: none">1. An internal audit has been conducted to determine:<ul style="list-style-type: none">• The degree of consistency that the commitments are applied with respect to the intent of the MCA Safe, Healthy and Respectful Workplaces policy• Whether accountabilities and responsibilities are understood• Whether the commitments to safety and health have been communicated to employees, contractors, and suppliers at the facility• Whether processes are in place to ensure that employees, contractors, suppliers, who work at the facility are aware of the safety and health commitments.2. Employees and contractors who work at the facility at the facility demonstrate their commitment to safety and health.

¹ A facility may be an individual site or operation. See FAQ 31 for a flexible approach to determining a facility for TSM reporting.

² See FAQ 30 for minimum safety and health commitments.

Level	Criteria
AAA	<p>1. An external audit has been conducted to determine:</p> <ul style="list-style-type: none"> • The degree of consistency that the commitments are applied with respect to the intent of the MCA safe, healthy and respectful workplaces policy • Whether accountabilities and responsibilities are understood • Whether the commitments to safety and health have been communicated to employees, contractors, and suppliers at the facility • The effectiveness of the process in place to ensure that employees, contractors, and suppliers who work at the facility are aware of the commitments.

INDICATOR 2: PLANNING AND IMPLEMENTATION

Purpose

To confirm that processes have been established to effectively plan for and manage safety and health controls to prevent the occurrence of incidents, acknowledging safety and health is a shared responsibility, and that hazard identification, risk assessment and the establishment of effective controls are integral to an effective management system.

Assessment Criteria

Level	Criteria
C	The facility does not meet all Level B criteria.
B	<ol style="list-style-type: none"> 1. Some safety and health management system elements are established, including a clear incident notification and investigation process. 2. Risk control tools are identified and available. 3. The facility has identified the most common tasks. 4. Standard operating procedures and safe work practices are in place for the facility's most common tasks.³ 5. The company has developed an action plan to meet all Level A requirements.
A	<ol style="list-style-type: none"> 1. A documented safety and health management system is established, implemented and maintained.⁴ At a minimum, it incorporates: <ul style="list-style-type: none"> • Objectives and targets, with supporting plans to achieve them • A hazard identification risk assessment (HIRA) and control processes • Identification of high consequence hazards and related critical controls • An occupational hygiene program⁵ • Defined roles and responsibilities for safety and health management • Workplace inspection • Maintenance of safety and health records. 2. Resources are assigned to establish, implement, maintain, and improve the safety and health management system and validate effectiveness of controls.

³ Standard Operating Procedures, also referred to as Safe Operating Procedures, Safe Work Procedures or Safe Work Method Statements, contain step-by-step instructions on how to safely perform a task.

⁴ See FAQ 32 for Safety and Health Management Systems.

⁵ Occupational hygiene may also be referred to as industrial hygiene in some jurisdictions.

Level	Criteria
AA	<ol style="list-style-type: none"> 1. An internal audit has been conducted to determine whether planning and implementation of the safety and health management system meets the requirements of Level A. 2. Occupational hygiene risks and controls have been reviewed by a qualified hygienist. 3. The facility has verified on a pre-determined frequency that critical controls are in place and functioning, and the definition of critical controls differentiates between critical controls, mitigating controls and underpinning controls.
AAA	<ol style="list-style-type: none"> 1. An external audit has been conducted to determine whether planning and implementation of the safety and health management system meets the requirements of Level A. 2. Occupational hygiene program is subject to the oversight of a qualified hygienist. 3. Facility-specific and especially hazardous tasks have been identified, and critical controls for those tasks have been identified through an established controls identification methodology (such as a bowtie analysis) and reviewed on a pre-determined frequency.

INDICATOR 3: TRAINING, BEHAVIOUR AND CULTURE

Purpose

To confirm that processes have been established to effectively train employees and contractors on safe, healthy and respectful workplaces. To ensure they are competent in identifying hazards and preventing incidents and they understand that safety, health and respect is a shared responsibility and that safety behaviour is integral to controlling risk.

Assessment Criteria

Level	Criteria
C	The facility does not meet all Level B criteria.
B	<ol style="list-style-type: none">1. Basic training on safety and health hazards and risks, including high consequence tasks, has been provided at the facility and training records are maintained.2. The company has developed an action plan to meet all Level A requirements.
A	<ol style="list-style-type: none">1. A planned, documented and functional safety and health training program is in place that includes:<ul style="list-style-type: none">• Training needs analysis for employees, including consideration of required skills and competencies, and orientation for employees, on-site contractors, and visitors• The training program is implemented and includes a mechanism for review• Training records are maintained• Resources are assigned to implement and maintain the training program• Trainees are assessed for competency where tasks have safety and health competency-based requirements• Trainers are qualified to deliver safety and health training programs• Training includes hazard identification and control with a focus on prevention and proactive measures• A job observation program supports and reinforces training through routine safety checks and coaching to encourage safe behaviour and work practices• The facility has mechanisms in place for the participation of workers in hazard identification, risk assessment and determination of controls and considering input from workers in setting safety, health and respectful objectives.

Level	Criteria
AA	<ol style="list-style-type: none"> 1. The facility encourages organisational engagement in key requirements for health and safety by integrating safety, health and respectful criteria into core business processes and practices, including at a minimum: <ul style="list-style-type: none"> • The annual business plan • Purchasing decisions • Performance appraisal processes • The compensation system (i.e. the rewards package provided to employees is affected by safety and health performance). 2. The facility's programs promote and encourage health and wellness, including mental health and a healthy lifestyle.
AAA	<ol style="list-style-type: none"> 1. The commitment to safe, healthy and respectful workplaces is visibly embedded throughout the facility. 2. Facility management visibly demonstrates commitment with one-on-one interactions with employees. 3. Trainers are assessed for effectiveness.⁶ 4. A program is available to support worker mental health and provide assistance when required.

⁶ Confidentiality should be a feature of these programs

INDICATOR 4: MONITORING AND REPORTING

Purpose

To confirm that safety, health and respect performance is regularly monitored and reported both internally and externally.

Assessment Criteria

Level	Criteria
C	The facility does not meet all Level B criteria.
B	<ol style="list-style-type: none"> Some basic training, safety and health metrics are monitored and reported to facility management on a regular basis, going beyond regulatory requirements. Key performance indicators are reported or posted within the facility. The company has developed an action plan to meet all Level A requirements.
A	<ol style="list-style-type: none"> Documented safe, healthy and respectful workplaces monitoring and reporting occurs, including: <ul style="list-style-type: none"> Performance metrics are clearly defined, consistently applied, regularly assessed (including against broader industry performance) and internally reported Performance metrics are used to analyse trends for informing decisions and guiding continuous improvement A monitoring program includes: <ul style="list-style-type: none"> Tracking and internal reporting of leading and lagging indicators Safety and health and occupational hygiene inspection and monitoring Health monitoring⁷ Organisational culture monitoring Incident investigation and follow-up A safety and health audit program is in place, and compliance audits and management system audits are conducted in accordance with the audit plan The monitoring and audit programs include a focus on high consequence hazards The facility assesses the adequacy and effectiveness of its safety and health management system annually and makes recommendations on how to make continual improvement Regular management review of safety, health and respectful behaviours performance takes place for the purpose of continual improvement and to inform decision-making Results of workplace monitoring, inspection and follow-up action are recorded and communicated within the facility Safety, health and respectful workplace performance is communicated to the public at least once per year.

⁷ Health monitoring is referred to as health surveillance in some jurisdictions.

Level	Criteria
AA	<ol style="list-style-type: none"> 1. An internal audit has been conducted to determine whether the safety and health data and information collection, compilation and reporting meets the requirements of Level A. 2. Thresholds and triggers related to the performance of critical controls are in the process of being developed and implemented, with some thresholds and triggers already in place. 3. The monitoring and audit programs include a focus on critical controls.
AAA	<ol style="list-style-type: none"> 1. An external audit is conducted to determine whether the safety and health data and information collection, compilation and reporting meet the requirements of Level A. 2. An internal evaluation of effectiveness is conducted, and a tracking process is in place for opportunities for improvement identified. This includes evaluation of the quality of investigations and the close-out of actions, contributing to a culture of continuous improvement.

INDICATOR 5: PERFORMANCE

Purpose

Recognising the industry's commitment to eliminating fatalities, injuries and occupational illnesses and to ensure respectful workplaces, the purpose of this indicator is to confirm that continual improvement targets have been established at each facility and performance relative to targets is assessed.

Assessment Criteria

Level	Criteria
C	The facility does not meet all Level B criteria.
B	<ol style="list-style-type: none">1. Safety and health performance targets are set for employees of the facility.2. Targets are communicated to employees.3. The company has developed an action plan to meet all Level A requirements.
A	<ol style="list-style-type: none">1. Performance targets include on-site contractors.2. Facility management is involved in reviewing and improving performance relative to targets.3. Performance results are communicated to employees and on-site contractors on a pre-determined frequency.4. The facility has not had a fatality in the reporting year.
AA	<ol style="list-style-type: none">1. Performance targets are set for both leading and lagging indicators.2. Senior company management reviews performance on a pre-determined frequency against facility targets and associated improvement plans.3. The facility (or company) benchmarks its safety and health performance against its peers.
AAA	<ol style="list-style-type: none">1. The facility has consistently met its continual improvement performance targets (at least 3 of the last 4 years) and is fatality free over the entire four-year period.2. The facility externally audits its safety and health performance to ensure accuracy and reliability.

APPENDIX 1: FREQUENTLY ASKED QUESTIONS

Protocol-Specific Guidance

1. What is Hazard Identification and Risk Assessment (HIRA)?

These may also be called Workplace Risk Assessments. In Australia, these are prescribed by law and relevant state and territory legislation.

HIRA or workplace risk assessment is a documented process that ensures all safety and health hazards have been identified, the level of risk has been assessed, and risk management controls have been put into place to manage the risk. A typical process includes the following:

- Site surveys
- Hierarchy of controls
- Risk register
- HAZOP and Fail-safe processes
- Management of Change
- Job Safety Analysis
- Field-based risk assessments (or similar)
- Identification of events with a reasonable potential to result in a life-altering injury or occupational disease.

To demonstrate that a facility has “hazard identification, risk assessment and control processes” in place, it is expected the facility would have documented processes to identify hazards, assess associated risks and identify appropriate controls. A documented or electronic risk register would identify site hazards and controls in place to address the hazards, and the facility would have a risk assessment tool or process that can be applied at the field level.

2. How do you determine if safety and health commitments are consistent with the MCA’s Safe, Healthy and Respectful Workplaces policy?

The Safe, Healthy and Respectful Workplaces policy establishes several commitments that MCA member companies agree to uphold. The spirit and intent of a company’s Safe, Healthy and Respectful Workplace commitments should be consistent with that of the MCA policy. While corporate commitments are not required to include all the specific commitments identified in the policy, they should demonstrate general support and alignment with the MCA policy without expressly referring to it.

3. What are ‘Job Observations’?

Job Observations help to eliminate unsafe or hazardous acts and conditions. It actively encourages the whole workforce to be involved and therefore generates greater safety awareness both individually and collectively. It is a process normally performed by supervision and management with the involvement of the workforce. A Job Observation process consists of five fundamental steps:

- Plan to observe
- Observe a task
- Engage with the worker to understand the job, procedure, hazards, associated risks and controls
- Provide positive feedback or reinstruction back to the worker(s)
- Look for a commitment to continue to perform the work in a safe and healthy manner.

The observation process can be used to check in on the effectiveness of hazard identification and risk assessment programs as well as health and safety management systems (e.g. field level risk assessments, procedures, training, rules and standards, and the results of safety investigations).

4. Can corporate documentation be used to demonstrate facility-level commitment?

Written senior management commitment at the corporate level (e.g. a corporate policy) can only be accepted as evidence during a facility-level self-assessment or TSM verification if it is accompanied by evidence that the corporate commitment is being applied and adhered to at the facility level. There must be evidence of a link between the corporate documentation and facility-level practices. If this linkage is established, then the corporate documentation can be accepted as evidence of facility-level commitment.

5. What is meant by ‘contractors and suppliers at the facility’?

This term refers to vendors and contractors who work at the site or who physically enter the site. It is expected that a facility communicates relevant health and safety commitments to those contractors and suppliers who work at or physically enter the site.

6. What level of benchmarking is adequate?

Recognising the limitations of doing so, for Indicator 5: Performance (Level AA), it is expected that the facility or company will compare its safety and health performance with the performance of others on a regular basis (i.e. within the last three years). Facilities or companies can use any of a number of methods or sources to obtain these comparative data including, for example, use published industry data (where available), compilation of publicly available data, participation in benchmarking studies or initiation of benchmarking studies. Benchmarking may be done across facilities (internal to company) with peers (external to company) or a combination of both. Benchmarking should cover the range of identified performance targets.

7. What would prevent a facility from achieving a level A for indicator 5?

Facilities that have experienced an occupational fatality within the reporting year are not eligible for level A or higher for indicator 5 (performance). An occupational fatality is defined as the death of an employee, contractor or visitor because of a work-related incident arising from an activity under management control.

8. What is meant by ‘control’?

This term refers to an act, object (engineered) or system (combination of act and object) intended to prevent or mitigate an unwanted event or to reduce or eliminate the consequences of an unwanted event.

For more information, see: ICMM. 2015. [Health and Safety Critical Control Management](#).

Control measures are defined by Safe Work Australia as an action taken to eliminate or minimise health and safety risks so far as is reasonably practicable. A hierarchy of control measures is set out in the WHS Regulations to assist duty holders to select the highest control measures reasonably practicable.

For more information, see: Safe Work Australia <https://www.safeworkaustralia.gov.au/glossary>.

9. How can a facility demonstrate that trainers are qualified to deliver safety and health training program?

Considerations for determining whether a person is qualified include, but are not limited to:

- Previous training experience
- Previous experience in performing the task or activity
- Exam or acknowledgment from the facility on trainer competency
- Knowledge and specific safety and health-related training, formal education, training and third-party credentials
- Demonstrated history in performing the task that is the subject of the training program.

Examples of vocational training and formal education or certifications include:

- Formal Qualifications including
 - Certificate IV in Training and Assessment
 - Certificate IV in Work Health and Safety
 - Diploma of Work Health and Safety.
- Australian Institute of Health and Safety (AISH) members
 - Certified OHS Practitioner
 - Certified OHS Professional or Chartered OHS Professional.

Training requirements may also be defined under applicable workplace health and safety law.

10. What is meant by 'health monitoring'?

Occupational health monitoring is the analysis of health information intended to identify problems resulting from occupational (or non-occupational) exposures that may require intervention activities. Monitoring provides feedback to the employer by examining health surveillance data from a group of employees or a single employee to look for abnormal trends in health status. A review of group data helps identify potential exposure problems and assess the effectiveness of existing worksite controls and preventive strategies. Employees' personal medical histories must be kept confidential. Health monitoring should be undertaken by an appointed, appropriately trained medical practitioner.

For more information see [should monitor health \(Safe Work Australia](https://www.safeworkaustralia.gov.au/safety-topic/managing-health-and-safety/health-monitoring)

<https://www.safeworkaustralia.gov.au/safety-topic/managing-health-and-safety/health-monitoring>

11. What could be included in an occupational hygiene program?

Typically, an occupational hygiene program will consist of the following:

- Anticipation of potential exposures arising from workplace activities (e.g., purchasing and use of hazardous substances)
- Identification or recognition of exposures by qualitative means (e.g., workplace walk-through surveys)
- Evaluation of identified exposures by monitoring and sampling of contaminants (qualitative and quantitative against applicable criteria)
- Control of exposures to acceptable levels (a hierarchy of control is used)
- Controls to address a range of health hazards, including biological (e.g. legionella, mould and COVID-19), and physical (e.g. vibration, noise, radiation, chemical and psychosocial) risks
- A review of the effectiveness of controls to ensure that they are working as intended to reduce or eliminate exposures

12. What is meant by a 'qualified hygienist'?

To achieve Level AA for Indicator 2, the facility must be able to demonstrate that its occupational hygiene risks and controls have been reviewed by a qualified hygienist. To achieve Level AAA for Indicator 2, the facility must be able to demonstrate that its occupational hygiene program is overseen by a qualified hygienist. These reviews should be conducted by, or under the direction of, a person who is qualified based on knowledge, training and/or experience in accordance with recognised occupational hygiene practice.

Examples of relevant certification or qualifications include:

- Certified Occupational Hygienist (COH)
- Certified Industrial Hygienist (CIH)
- Registered Occupational Hygienist (ROH)
- Full Member of the Australian Institute of Occupational Hygienists (MAIOH)
- Successful completion of an acceptable degree in Science or Engineering (or equivalent):
 - Master of Occupational Hygiene
 - Master of Occupational Health and Safety (major in Occupational Hygiene)
 - Graduate Diploma of Occupational Hygiene
 - Master of Science (Occupational Hygiene Practice).

AUDIT

13. What is the expected focus of audit activities?

For Indicator 4: Monitoring and Reporting, it is expected that audit activities would assess the processes in place for collecting, compiling and reporting safety, health and respect data and information to confirm that defined processes are in place and to test that these processes are being consistently applied.

For Indicator 5: Performance (Level AAA), it is expected that external audit activities would test the robustness and accuracy of collected safety, health and respect performance data by reviewing the base data that are collected, testing that these data were accurately screened and entered into a database, and conducting a data review of the aggregate numbers.

14. Can a company or facility achieve a Level AAA on satisfactory completion of an external audit, without having completed a Level AA internal audit?

Yes, because the TSM Performance Indicator assessment is a snapshot in time of a company's or facility's status as relates to each specific performance indicator. Assigning a rating of Level AA or AAA is based on whether an audit is internal or external. A company or facility does not need to do an internal audit (qualifying for a rating of Level AA) before receiving a rating of Level AAA for an external audit.

15. For how long are internal and external audits valid?

An internal or external audit that was completed within the last three (3) years meets the requirements for an internal or external audit as required by Level AA or Level AAA in many of the indicators of this protocol.

16. How may facilities conduct audits?

Audits evaluate and report on the degree of conformance with stipulated criteria based on the systematic collection and documentation of relevant evidence. Audits involve some judgement but are not designed to determine the root cause of deficiencies or evaluate management system effectiveness.

Internal audits are conducted by employees of the company with appropriate knowledge and competencies who are independent, impartial, and objective with respect to the management of the facility being audited. For example, they could work at other facilities in the corporate portfolio or at the corporate level.

External audits are conducted by auditors who are external to the company being audited. Auditors maintain an objective viewpoint throughout the audit process to ensure that findings and conclusions are based only on the evidence. (Adapted from ISO 19011).

17. How can a facility set objectives and performance requirements for critical controls?

Defining critical controls' objectives, performance requirements and how performance is verified in practice is an important step in critical control management. A company can start by defining the objective of the critical control to fully understand the role, expectations and outcomes of the control. The performance requirements are the standards to which a control must perform, consist of an action and a value.

Performance requirements for a control may already exist within company documents. This can be determined by reviewing the relevant processes, procedures, maintenance manuals and other support documents. Industry standards may also help to determine performance requirements. However, caution should be applied as industry-wide standards may not be specific or directly related to the context of the control.

Performance requirements should be specific, measurable, appropriate and realistic. It is also important to define the level of performance that would initiate immediate action to shut down or change an operation or to signal that improvements to the critical control are required. For more information, see: ICM. 2015. [Critical Control Management Implementation Guide](#).

TERMINOLOGY

The definitions below are provided to support a common understanding of protocol criterion, it should be recognised that some may defined safety and health law applicable to the jurisdiction in which the facility operates.

18. How is 'senior management' defined?

For the purposes of safety and health performance measurement, senior management refers to the most senior level of management at the facility level (e.g. General Manager, Site Manager, etc.).

Where the protocol requires that accountability for safety and health be assigned at all levels, the expectation would be that accountabilities at the site and at the business unit, regional or corporate level be defined (depending on the corporate structure and location of headquarters). Verification of this requirement will not require engagement with corporate headquarters located outside of Australia. Senior management may be defined in applicable safety and health law.

19. What is meant by 'planning'?

Planning includes activities such as identifying hazards, assessing risk, and determining controls; identifying and having access to applicable legal requirements; and, establishing and maintaining documented objectives and supporting programs at relevant functions and levels within the facility (Adapted from ISO 45001).

20. What is 'workplace monitoring'?

Workplace monitoring may include, but is not limited to, such items as workplace examination, occupational hygiene monitoring, fitness for duty monitoring, ambient workplace conditions or other similar activities.

21. What is 'compensation'?

Compensation is defined as the total rewards package provided to employees.

22. What is a 'system'?

A 'system', or 'management system', refers to processes that collectively provide a systematic framework for ensuring that tasks are performed correctly, consistently and effectively to achieve a specified outcome and to drive continual improvement in performance. A systems approach to management requires assessing what needs to be done, planning to achieve the objective, implementing the plan and reviewing performance in meeting the set goal. A management system also considers necessary personnel, resources and documentation. Other definitions associated with systems are:

- **Policy:** An expression of management's commitment to a particular issue that presents the stance of the company to interested external parties
- **Practice:** Informal, undocumented approaches to carrying out a task
- **Procedure:** A repeatable description of how a task is to be carried out.

23. What does 'effective' mean?

Where the term 'effective' is used, it requires the element to be operational in order that desired outcomes can be achieved.

24. What does 'accountability' mean?

Accountability means that the management system must identify the party who is ultimately answerable for safety and health performance and the development and implementation of the management system at the facility. This accountability cannot be delegated. Resources are available to the accountable party to ensure proper systems (training, equipment, communications, etc.) are in place to effectively meet their safety and health goals.

25. What does 'responsibility' mean?

Responsibility means that, within the safety and health management system, specific safety- and health-related requirements and tasks are identified and assigned to specific positions within the facility. It is important that responsibilities are clearly communicated and that each position understands what is expected of them.

Responsibility may be defined in applicable safety and health law.

26. What is a 'bowtie analysis'?

A bowtie analysis (BTA) is an analytical method for identifying and reviewing controls intended to prevent or mitigate a specific unwanted event. For more information, see: ICMM. 2015. [Health and Safety Critical Control Management](#).

27. What are 'preventing controls' and 'mitigating controls'?

As indicated in FAQ 8, a control is an act, object or system intended to prevent or mitigate an unwanted event or to reduce or eliminate the consequences of an unwanted event.

- A preventive control reduces the likelihood of an unwanted event occurring
- A mitigating control eliminates or reduces the consequences of the unwanted event.

28. What are ‘material unwanted events’, ‘critical controls’ and ‘underpinning controls’?

Material unwanted event (MUE) are where the potential or real consequence exceeds a threshold defined by the company as warranting the highest level of attention (e.g., a high-level health or safety impact).

- A critical control is one that is crucial to preventing or mitigating the consequences of a material unwanted event. The absence or failure of a critical control would significantly increase risk despite the existence of other controls. A control that prevents more than one unwanted event or mitigates more than one consequence is normally classified as critical. A critical mitigating control eliminates or reduces to within an acceptable threshold the consequences of the material unwanted event
- An underpinning control is an activity or mechanism that is not critical (i.e. does not represent a direct barrier to an unwanted event) but is important in maintaining or supporting the effectiveness of critical controls. These might include training systems, monitoring activities, and operating or response plans. This is a broad category that may include activities within the management systems that support having the critical control able to do what is required, such as inspections, and that may provide information for verification of the status of the critical control.

For more information, see: ICMM. 2015. [Health and Safety Critical Control Management](#) and ICMM. 2015. [Critical Control Management Implementation Guide](#).

29. What are ‘thresholds’ and ‘triggers’?

Companies are responsible for defining the thresholds of unacceptable critical control performance. Performance below the threshold should trigger an action, which might vary from an investigation to an order to immediately stop the relevant work processes.

For more information, see: ICMM. 2015. [Health and Safety Critical Control Management](#).

OTHER

30. What are minimum level commitments to safe, healthy and respectful workplaces?

Minimum-level commitments include recognition that:

- All fatalities, injuries and occupational illnesses are preventable
- No task is so important that it cannot be done safely and respectfully
- All hazards can be identified, and risks eliminated or controlled
- All instances of harassment and disrespectful behaviour in the workplace can be prevented.

31. How is a ‘facility’ defined for reporting purposes?

Flexibility is provided in determining what constitutes a facility for the purposes of meeting TSM reporting requirements. Where appropriate, companies may wish to take an aggregated approach to individual activities or sites (e.g. due to close proximity or connected operations). The definition of facility should be consistent across all TSM protocols.

32. What should be considered in safety and health management systems?

A safety and health management system that complies with relevant legal requirements will typically include:

- Governance structures
- Policies
- Training
- Hazard identification, risk assessment and controls
- Monitoring
- Review.

It is recommended these components reflect management system requirements in line with AS/NZS/ISO 45001.

33. What guidance is available for addressing sexual harassment in the workplace?

Sexual harassment is unacceptable and against the law. MCA member companies have committed to the elimination of sexual harassment from the industry's culture and workplace. To implement this commitment, the MCA has established an [Industry Code on Eliminating Sexual harassment](#).

These and other resources and toolkits can be found on the MCA website: www.minerals.org.au

34. Can actions to satisfy regulatory requirements be used to support TSM scoring?

Yes. In Australia and other countries where safety and health law is highly developed, there is expected to be overlap between what is required under law and industry good practice.

35. What is meant by 'risk control tools'?

At Level B facilities are expected to have basic risk control tools in place to enable employees and contractors who work at the facility to identify hazards and put controls in place prior to undertaking tasks. This could include the use of checklists, pre-starts, workplace inspections or personal risk assessment tools (e.g., 'Take 5', SLAM or STAR).

USEFUL REFERENCES

ICMM. 2009. [Leadership Matters: Elimination of Fatalities](#).

ICMM. 2015. [Health and Safety Critical Control Management](#).

ICMM. 2015. [Critical Control Management Implementation Guide](#).

APPENDIX 2: SAFETY AND HEALTH

SELF ASSESSMENT CHECKLIST

Facility Name:		Company Name:	
Assessed By:		Date Submitted:	

Supporting Documentation / Evidence:	
NAME OF DOCUMENT	LOCATION

Interviewees:			
NAME	POSITION	NAME	POSITION

INDICATOR 1: COMMITMENT AND ACCOUNTABILITY

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
Level B	1. Is a demonstrated commitment to safe, healthy and respectful workplaces evident?				
	2. Is a senior management representative accountable for safety and health?				
	3. Has the company developed an action plan to meet all Level A requirements?				
	<i>If you have answered "Yes" to all the Level B questions, continue to the Level A questions. If you have not answered "Yes" to all the Level B questions, assess the facility as a Level C.</i>				
Level A	1. Are commitments defined and authorised by the company's senior management and consistent with the intent of the MCA Safe, Healthy and Respectful workplaces policy?				
	2. Is there a process in place to ensure that employees, contractors, and suppliers who work at the facility are aware of the company's safety and health commitments?				
	3. Are accountabilities and responsibilities understood at all levels?				
	<i>If you have answered "Yes" to all the Level A questions, continue to the Level AA questions. If you have not answered "Yes" to all the Level A questions, assess the facility as a Level B.</i>				
Level AA	1. Has an internal audit been conducted to determine:				
	a. The degree of consistency that the commitments are applied with respect to the intent of the MCA Safe, Healthy and Respectful workplaces policy?				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
Level AA	b. Whether accountabilities and responsibilities are understood?				
	c. Whether the commitments to safety and health have been communicated to employees, contractors, and suppliers at the facility?				
	d. Whether processes are in place to ensure that employees, contractors, and suppliers who work at the facility are aware of the safety and health commitments?				
	2. Do employees at the facility demonstrate their commitment to safety and health?				
<i>If you have answered "Yes" to all the Level AA questions, continue to the Level AAA questions. If you have not answered "Yes" to all the Level AA questions, assess the facility as a Level A.</i>					
Level AAA	1. Has an external audit been conducted to determine:				
	a. The degree of consistency that the commitments are applied with respect to the intent of the MCA Safe, Healthy and Respectful workplaces policy?				
	b. Whether accountabilities and responsibilities are understood?				
	c. Whether the commitments to safety and health have been communicated to employees, contractors, and suppliers at the facility?				
	d. The effectiveness of the process in place to ensure that employees, contractors, and suppliers who work at the facility are aware of the commitments?				
<i>If you have answered "Yes" to all the Level AAA questions, assess the facility as a Level AAA. If you have not answered "Yes" to all the Level AAA questions, assess the facility as a Level AA.</i>					
ASSESSED LEVEL OF PERFORMANCE FOR INDICATOR 1					Level: ____

INDICATOR 2: PLANNING AND IMPLEMENTATION

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
Level B	1. Have some safety and health management systems been established, including a clear incident notification and investigation process?				
	2. Are risk control tools identified and available?				
	3. Has the facility identified the most common tasks?				
	4. Are standard operating procedures and safe work practices in place for the facility's most common tasks?				
	5. Has the company developed an action plan to meet all Level A requirements?				
<i>If you have answered "Yes" to all the Level B questions, continue to the Level A questions. If you have not answered "Yes" to all the Level B questions, assess the facility as a Level C.</i>					
Level A	1. Is a documented safety and health management system established, implemented, and maintained? At a minimum, does it incorporate:				
	a. Objectives and targets, with supporting plans to achieve them?				
	b. A hazard identification, risk assessment (HIRA) and control processes?				
	c. Identification of high consequence hazards and related critical controls?				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
Level A	d. An occupational hygiene program?				
	e. Defined roles and responsibilities for safety and health management?				
	f. Workplace inspections?				
	g. Maintenance of safety and health records?				
	2. Are resources assigned to establish, implement, maintain, and improve the safety and health management system and validate effectiveness of controls?				
<i>If you have answered "Yes" to all the Level A questions, continue to the Level AA questions. If you have not answered "Yes" to all the Level A questions, assess the facility as a Level B.</i>					
Level AA	1. Has an internal audit been conducted to determine whether planning and implementation of the safety and health management system meets the requirements of Level A?				
	2. Have occupational hygiene risks and controls been reviewed by a qualified hygienist?				
	3. Has the facility verified on a pre-determined frequency that critical controls are in place and functioning, and does the definition of critical controls differentiate between critical controls, mitigating controls and underpinning controls?				
	<i>If you have answered "Yes" to all the Level AA questions, continue to the Level AAA questions. If you have not answered "Yes" to all the Level AA questions, assess the facility as a Level A.</i>				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
Level AAA	1. Has an external audit been conducted to determine whether planning and implementation of the safety and health management system meets the requirements of Level A?				
	2. Is the occupational hygiene program subject to the oversight of a qualified hygienist?				
	3. Have facility-specific and especially hazardous tasks been identified, and critical controls for those tasks identified through an established controls identification methodology (e.g., bowtie analysis)?				
	<i>If you have answered "Yes" to all the Level AAA questions, assess the facility as a Level AAA. If you have not answered "Yes" to all the Level AAA questions, assess the facility as a Level AA.</i>				
	ASSESSED LEVEL OF PERFORMANCE FOR INDICATOR 2			Level: ____	

INDICATOR 3: TRAINING, BEHAVIOUR AND CULTURE

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
Level B	1. Has basic training on safety and health hazards and risks, including high consequence tasks, been provided at the facility and are training records maintained?				
	2. Has the company developed an action plan to meet all Level A requirements?				
	<i>If you have answered "Yes" to all the Level B questions, continue to the Level A questions. If you have not answered "Yes" to all the Level B questions, assess the facility as a Level C.</i>				
Level A	1. Is a planned, documented, and functional safety and health training program in place that includes:				
	a. Training needs analysis for employees, including consideration of required skills and competencies, and orientation for employees, on-site contractors, and visitors?				
	b. The training program is implemented and includes a mechanism for review?				
	c. Training records are maintained?				
	d. Resources are assigned to implement and maintain the training program?				
	e. Trainees are assessed for competency where tasks have safety and health competency-based requirements?				
	f. Trainers are qualified to deliver safety and health training program?				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
Level A	g. Training includes hazard identification and control with a focus on prevention and proactive measures?				
	h. A job observation program supports and reinforces training to ensure routine safety checks and coaching are in place to encourage safe behaviour and work practices?				
	i. Does the facility have mechanisms in place for the participation of workers in hazard identification, risk assessment and determination of controls and considering input from workers in setting safety, health and respectful objectives?				
	<i>If you have answered "Yes" to all the Level A questions, continue to the Level AA questions. If you have not answered "Yes" to all the Level A questions, assess the facility as a Level B.</i>				
Level AA	1. Does the facility encourage organisational engagement in key requirements for health and safety by integrating safety and health criteria into core business processes and practices, including:				
	a. The annual business plan?				
	b. Purchasing decisions?				
	c. Performance appraisal processes?				
	d. The compensation system (i.e. the rewards package provided to employees is affected by safety and health performance)?				
	2. Do the facility's programs promote and encourage health and wellness, including mental health, and a healthy lifestyle?				
<i>If you have answered "Yes" to all the Level AA questions, continue to the Level AAA questions. If you have not answered "Yes" to all the Level AA questions, assess the facility as a Level A.</i>					

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
Level AAA	1. Is the commitment to safe, healthy and respectful workplaces visibly embedded throughout the facility?				
	2. Does facility management visibly demonstrate commitment with one-on-one interactions with employees?				
	3. Are trainers are assessed for effectiveness?				
	4. Is a program developed to support worker mental health and provide assistance when required?				
	<i>If you have answered "Yes" to all the Level AAA questions, assess the facility as a Level AAA. If you have not answered "Yes" to all the Level AAA questions, assess the facility as a Level AA.</i>				
ASSESSED LEVEL OF PERFORMANCE FOR INDICATOR 3					Level: ____

INDICATOR 4: MONITORING AND REPORTING

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
Level B	1. Are some basic safety and health metrics monitored and reported to facility management on a regular basis, beyond regulatory requirements?				
	2. Are key performance indicators reported or posted within the facility?				
	3. The company has developed an action plan to meet all Level A requirements.				
	<i>If you have answered "Yes" to all the Level B questions, continue to the Level A questions. If you have not answered "Yes" to all the Level B questions, assess the facility as a Level C.</i>				
Level A	1. Is there a, documented safety and health monitoring and reporting program in place that includes:				
	a. Performance metrics that are clearly defined, consistently applied, regularly assessed (including against broader industry performance), and internally reported?				
	b. Performance metrics used to analyse trends for informing decisions and guiding continuous improvement?				
	c. A monitoring program that includes tracking and internal reporting of leading and lagging indicators, safety and health and occupational hygiene inspection and monitoring, health monitoring, organisational culture monitoring and incident investigation and follow up?				
	d. A safety and health audit program in place, and compliance audits and management system audits conducted in accordance with the audit plan?				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
Level A	e. The monitoring and audit programs include a focus on high consequence hazards?				
	f. The facility assesses the adequacy and effectiveness of its safety and health management system annually and makes recommendations on how to make continual improvement?				
	g. Annual review of safety and health performance for the purpose of continual improvement and to inform decision-making?				
	h. Results of workplace monitoring, inspection and follow-up action are recorded and communicated within the facility?				
	i. Safety and health performance communicated to the public on at least an annual basis?				
	<i>If you have answered "Yes" to all the Level A questions, continue to the Level AA questions. If you have not answered "Yes" to all the Level A questions, assess the facility as a Level B.</i>				
Level AA	1. Has an internal audit been conducted to determine whether the safety and health data and information collection, compilation and reporting meets the requirements of level A?				
	2. Are thresholds and triggers related to the performance of critical controls in the process of being developed and implemented, with some thresholds and triggers already in place?				
	3. Does the monitoring and audit programs include a focus on critical controls?				
	<i>If you have answered "Yes" to all the Level AA questions, continue to the Level AAA questions. If you have not answered "Yes" to all the Level AA questions, assess the facility as a Level A.</i>				

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
Level AAA	1. Has an external audit been conducted to determine whether the safety and health data and information collection, compilation and reporting meets the requirements of level A?				
	2. Has an internal evaluation of effectiveness been conducted, and is a tracking process in place for opportunities for improvement identified? Does this include evaluation of the quality of investigations and the close-out of actions, contributing to a culture of continuous improvement?				
	<i>If you have answered "Yes" to all the Level AAA questions, assess the facility as a Level AAA. If you have not answered "Yes" to all the Level AAA questions, assess the facility as a Level AA.</i>				
	ASSESSED LEVEL OF PERFORMANCE FOR INDICATOR 4			Level: ____	

INDICATOR 5: PERFORMANCE

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
Level B	1. Are safety and health performance targets set for employees of the facility?				
	2. Are targets communicated to employees?				
	3. Has the company developed an action plan to meet all Level A requirements?				
	<i>If you have answered "Yes" to all the Level B questions, continue to the Level A questions. If you have not answered "Yes" to all the Level B questions, assess the facility as a Level C.</i>				
Level A	1. Do performance targets include on-site contractors?				
	2. Is facility management involved in reviewing and improving performance relative to targets?				
	3. Are performance results communicated to employees and on-site contractors on a pre-determined frequency?				
	4. Is the facility fatality-free in the reporting year?				
<i>If you have answered "Yes" to all the Level A questions, continue to the Level AA questions. If you have not answered "Yes" to all the Level A questions, assess the facility as a Level B.</i>					

	QUESTION	Y	N	NA	DESCRIPTION & EVIDENCE
Level AA	1. Are performance targets set for both leading and lagging indicators?				
	2. Does senior facility management review site targets and improvement plans on a pre-determined frequency?				
	3. Does the facility (or company) benchmark its safety and health performance against its peers?				
	<i>If you have answered "Yes" to all the Level AA questions, continue to the Level AAA questions. If you have not answered "Yes" to all the Level AA questions, assess the facility as a Level A.</i>				
Level AAA	1. Has the facility consistently met its continual improvement performance targets (at least 3 of the last 4 years)?				
	a. Has the facility been fatality free over the entire four-year period?				
	2. Does the facility externally audit its safety and health performance to ensure accuracy and reliability?				
<i>If you have answered "Yes" to all the Level AAA questions, assess the facility as a Level AAA. If you have not answered "Yes" to all the Level AAA questions, assess the facility as a Level AA.</i>					
ASSESSED LEVEL OF PERFORMANCE FOR INDICATOR 5				Level: ____	