



# PROCEDURE

<b>Title: Contractor Management</b>	<b>Last Reviewed Date: 4/03/2019</b>
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## 1. PURPOSE

To identify key requirements and systems for the the management of Contractors and Sub-Contractors in relation to Workplace Health, Safety and Environment at Sunshine Sugar sites.

## 2. SCOPE

This procedure applies to all Contractors who undertake work for Sunshine Sugar and all employees involved in the engagement of Contractors and who work with Contractors on any of the sites.

## 3. DEFINITIONS

For the purpose of this document, the following definitions will apply:

<b>Contractor</b>	Any entity including an individual (who is not an employee of Sunshine Sugar), partnership, trust or company, including any employees, agents and subcontractors thereof, registered and engaged to provide services for (or on behalf of) Sunshine Sugar.
<b>Contractor Checklist Major or Significant Works or Projects</b>	The Checklist used by the Contract Manager to ensure Contractor compliance with this procedure before they commence work. This is used for major and/or significant projects.
<b>Contractor Checklist – Minor Works or Projects</b>	The Checklist used by Contractors prior to undertaking work onsite. This form is primarily used for contractor performing Minor Projects and Minor Works on a regular basis to confirm compliance with this procedure.
<b>Contractor Manager</b>	Any Sunshine Sugar employee who has responsibility for the task being carried out and for engaging and managing a Contractor. The Contract Manager may change during the life of a contract (eg: planners at initial stage and supervisor during the event).
<b>Contractor Register</b>	The register of Contractors maintained in Viis/ViisiSafe.
<b>Electrical Equipment</b>	Any tool operated by electricity including power cables, extension leads, residual current devices (RCDs) etc.
<b>High Risk Construction Work</b>	Any work to be undertaken by a Contractor as per Regulation 291 of the <i>Work Health and Safety Regulations 2011</i> .
<b>Lifting Equipment</b>	Any work equipment used for lifting and lowering loads, and includes any accessories used for lifting. Eg include overhead cranes, slings, shackles, hooks etc.
<b>Major Project (Principal Contractor Administered)</b>	Any large construction or maintenance project undertaken by a Contractor utilising their workforce, safety systems, plant and machinery etc. under their control. These projects are generally multi-million dollar projects and are not routinely undertaken at Sunshine Sugar.
<b>Significant Project (Sunshine Sugar Administered)</b>	Larger projects undertaken by Sunshine Sugar typically where a Sunshine Sugar representative oversees the development and construction of the project and engages Contractors to perform specific blocks of work under our control.
<b>Minor Project</b>	The smaller projects undertaken by Sunshine Sugar typically where a Sunshine Sugar representative oversees the project utilising Sunshine Sugar resources and may engage Contractors to perform specific blocks of work or provide services.
<b>Minor Works</b>	Relatively small monetary value works and/or services provided by a Contractor.

<b>Mobile Plant</b>	Includes any plant that is provided with some form of self-propulsion that is ordinarily under the direct control of an operator
<b>Registered Contractor</b>	A Contractor whose details are contained in the Contractor Register.
<b>Scope of Work</b>	The area in an agreement where the work to be performed by the Contractor is described. The Scope of Work should contain any milestones, reports, deliverables and end products that are expected to be provided.
<b>Sub-contractor</b>	A person or business that has a separate contract with a Contractor to provide some portion of the work or services on a project which the Contractor has agreed to perform.
<b>ViisiSafe</b>	The electronic data recording system used to help manage Health, Safety and Environment

#### 4. PROCEDURE

This procedure recognises the wide diversity of Contractors and the scope of works to be undertaken which make it difficult to lay down one set of rules to manage all Contractors under all circumstances and sets out the factors which must be considered when engaging and managing Contractors in the execution of their work.

The key elements to consider are:

- Contractor Registration;
- Contract Classification;
- Contractor Selection;
- Contractor Managers Checklist (Major/Significant Projects Only)
- Contractor Induction;
- Emergency Situations;
- Contractor Management;
- Contractor's Checklist; and
- System Review and Reporting.

##### 4.1. Contractor Registration

All Contractors must be registered in the Contractor Register. If a Contractor is not a Registered Contractor the Contract Manager must:

- Seek approval from the Engineering Manager, Production Manager or department head to have the Contractor included in the Contract Register;
- Get the Contractor to complete and return a **Contractor Application Form** and copies of insurance certificates.
- Submit a copy of the Contractor Application Form to Accounts Payable to be set up in RENCS. Registered contractors will be designated as C or T in RENCS; and
- Submit the Contractor Application Form and insurance certificates to the Purchasing Manager to be uploaded in ViisiSafe.

**Note:** Contractors designated as T (Sole Trader) are not required to submit a Workers' Compensation Insurance certificate.

If a contractor is to be de-registered for any reason then Accounts Payable must be notified. On receipt of notification Accounts payable must:

- Change the contractors designation to 'N' in RENCS, and
- Change the contractors status to 'Inactive' in ViisiSafe.

#### 4.2. Contract Classification

It is the responsibility of the person developing the Scope of Work for the contract, in consultation with the area at which the work is to be performed, to undertake the contract classification.

Contracts may be classified as:

- Major Projects;
- Significant Projects;
- Minor Projects; or
- Minor Works

#### 4.3. Contractor Selection

The most important thing to consider when selecting a Contractor is their ability to perform the task in a safe, efficient and effective way. For Minor Projects or Minor Works Contractors should be selected from the Contractor Register. For Major and Significant Projects the Contractor should be selected via a tender process as set out in the Tendering Policy.

#### 4.4. Contractor Managers Checklist

Once the Contractor has been selected, the following checklists need to be completed depending on the classification of the contracted works or project:

<b>Minor Projects/Works</b>	Complete <i>Contractor Checklist – Minor Works or Projects Only</i>
<b>Major/Significant Projects</b>	Complete <i>Contractor Checklists – Minor Works or Projects as well as Major or Significant Works and Projects</i>

The above checklists must be used by the Contract Manager at the time to ensure that all relevant safety aspects have been adequately dealt with before the contractor commences work.

The Scope of Works of the project to be undertaken will determine the level of detail required.

##### 4.4.1. Referrals and References

Contractors are required to give evidence of their capabilities in performing the assigned task including any special safety, health or environmental requirements of the work to be performed and the materials to be handled.

Where a Contractor is unable to do this or is unknown to the company, referees for the Contractor should be sought and checked for not only efficiency and quality of past workmanship but also their attitude to work health and safety.

##### 4.4.2. Insurances

The types and level of cover required, e.g. sums insured or limits of liability, will be dependent on the type and size of contract and advice should be sought from the Finance Manager as required and the Sunshine Sugar Request for Tender document referred to. The contractor is required to provide evidence of adequate and current copies of other key insurance cover depending upon the type of work being carried out.

As a minimum, all contractors are required to maintain:

- Public & Product Liability insurance to the value of \$10 Million; and
- Workers Compensation and/or personal accident insurance with the exception of sole traders

Other insurance cover required may include, but is not be limited to:

- Contract Works;
- Professional indemnity (for Contractors providing advice which if incorrect could lead to a financial loss);
- Comprehensive motor vehicle insurance (for Contractors providing transport services)
- Marine cargo (for Contractors providing transport of goods/freight).

The Contractor should provide a certificate of currency or copy of each policy which clearly states:

- Type of policy, extent of cover and specific exclusions
- The insured's name;
- Any third parties who have an insurable interest e.g. a lessee;
- The sum insured or limit of liability;
- The period of insurance i.e. commencement to expiry date.

#### **4.4.3. WHS Registered Plant**

Contractors that are required to bring prescribed items of Plant required to be registered under WHS Regulation onto any Sunshine Sugar premises (Registered Plant) must ensure the plant meets all requirements as set out in the conditions of registration.

If applicable the *Registered and High Risk Plant Checklist* must be completed and submitted to the relevant site Safety Officer.

Regular maintenance of Registered Plant is important and proof of maintenance must be provided on request.

#### **4.4.4. Mobile Plant**

All Mobile Plant to be used by the Contractor on Sunshine Sugar sites must be registered and a list that details their inspection dates and name of person who performed the inspection provided.

#### **4.4.5. Lifting Equipment**

All Lifting Equipment to be used by the Contractor must be certified and a list that details their inspection dates and name of person who performed the inspection provided.

#### **4.4.6. Electrical Equipment**

All electrical equipment to be used by the Contractor must be certified and a list which details they have been tagged and tested; their inspection dates and name of person who performed the inspection.

#### **4.4.7. Competencies to Work**

In order to ensure that the Contractor performing the works and services is appropriately qualified to perform the required tasks the Contractor will be requested to provide copies of relevant Competencies to Work (licences, qualifications and other tickets).

Examples of these would include but not be limited to:

- Trades licences;
- High Risk Work licences;
- Mobile plant operators tickets e.g. forklift trucks or crane operation;
- SafeWork NSW issued licenses such as Asbestos Removal or Demolition Licences.

#### **4.4.8. Safety Management**

In addition to existing regulatory requirements, when identifying the level of Risk Management planning documentation required for the contract works the following should be taken into account:

- The nature and size of the contract;
- The duration of the contract;
- The number of personnel involved; and
- The nature and magnitude of hazards and risks involved in the work.

The following safety documentation is required to be submitted for all works and projects depending on the scope thereof:

Contract Category	Document	Provided By
Major Project & All High Risk Construction Work	WHS Management Plan	Contractor
	Safe Work Method Statement (SWMS)	Contractor
Significant Project	Safety Plans	Contractor
Minor Project	Safe Work Procedures	Sunshine Sugar
	Safe Work Methods Statement (SWMS)	Sunshine Sugar
Minor Works	Safe Work Procedures and/or Risk Assessment	Sunshine Sugar

### WHS Management Plans

The site-specific *WHS Management Plan* shall include:

- a) a description of the work to be undertaken;
- b) the identified hazards and appropriate control measures;
- c) risk management processes to be used (e.g. inspections or SWMSs);
- d) induction and training requirements;
- e) incident management procedures;
- f) safety rules and procedures to be followed;
- g) a statement of responsibilities (including name and position);
- h) a description of the systems in place to manage any sub-contractors.

### Safe Work Method Statement (SWMS)

Contractors who are engaged to perform High Risk Construction Work (as defined in *Section 291 Work Health and Safety Regulation 2011*) must provide the company, prior to commencement of any work, a Safe Work Method Statement (SWMS).

The SWMS should be developed through risk assessment and for it to comply with the WHS Regulations, it must:

- a) Identify the work that is high risk construction work, and
- b) Specify hazards relating to the high risk construction work and risks to health and safety associated with those hazards, and
- c) Describe the measures to be implemented to control the risks, and
- d) Describe how the control measures are to be implemented, monitored and reviewed.

The SWMS must also take into account all relevant matters, including:

- Circumstances at the workplace that may affect the way in which the high risk construction work is carried out, and
- If the high risk construction work is carried out in connection with a construction project—the WHS management plan that has been prepared for the workplace, and
- Be set out and expressed in a way that is readily accessible and understandable to persons who use it.

### Safety Plans

WHS performance (including all accidents, injuries, near misses, property damage, spills and other incidents) must be reported against the Safety Plan to the Contract Manager.

In order to ensure that the Contractor performing the works and services will meet the required workplace health and safety and environment standards a careful review should be made of the Contractor's safety record and, where relevant, environmental record.

Particular attention should be paid to:

- The Contractor’s attitude to workplace health and safety, and where appropriate environmental protection;
- The quality and experience of the Contractor’s personnel;
- The quality, condition and suitability of the Contractors:
  - plant
  - equipment (including protective equipment); and
  - tools
- The Contractor’s work health and safety management system or, as a minimum;
  - Work health safety policy;
  - Procedures for risk assessment;
  - Safe operating procedures;
  - Emergency first aid response;
  - Hazard, accident and incident reporting and investigation.

### **Sunshine Sugar Documents**

For **Minor Projects**, the Contractor is required to comply with Sunshine Sugar safe work procedures and safe work method statements covering the work to be performed and undertake appropriate risk assessments.

For **Minor Works**, the Contractor is required to comply with site safety requirements and risk management procedures.

#### **4.4.8.1. Sub-Contractors**

The use of subcontractors is prohibited unless permission is provided by the Contract Manager.

The Contract Manager can only approve the use of a sub-contractor where all required documentation have been received. The contractor managers checklist is required to be completed.

Where the use of sub-contractors is permitted, the sub-contractor is required to comply with all requirements of this procedure. It is the responsibility of the main contractor to ensure the sub-contractor complies.

### **4.5. Contractor Induction**

Before a Contractor is allowed to commence work, the Contract Manager must ensure that the Contractor and their workers including sub-contractors have been inducted and that their induction is current.

For **Major** and **Significant** Projects induction training should include:

- Known and potential hazards on site e.g. asbestos, mobile plant etc.;
- The site safety rules e.g. smoking, traffic management, drug and alcohol etc.;
- Personal protective equipment requirements;
- Hazardous substance procedures;
- Accident and hazard reporting;
- First aid facilities on site;
- Site emergency procedures;
- Lock-out Tag out Procedures;
- Permits to work including but not limited to:
  - hot work;
  - confined spaces entry;
  - working at height;
  - penetration (walls) or excavation (underground services).

## 4.6. Contractor Management

### 4.6.1. Contractor Documentation

The details of Registered Contractors are listed in the Contractor Register which is maintained by the Purchasing Department and reviewed on a quarterly basis.

Any Registered Contractor not utilised in a 24 month period will be removed from the Contractor Register.

The Contract Manager is responsible for ensuring that the Contractor's details are up to date prior to raising a purchase requisition.

### 4.6.2. Site Access and Exit

Only Contractors with current and up-to-date details including insurances and inductions are to be permitted on-site.

Contractors entering any site to perform works and services will be required to sign in and sign out of the premises. This is an important process and ensures:

- Acknowledge and understanding of site safety rules;
- Specific site hazard awareness;
- Contractors are acknowledged as being on site. In the event of an emergency such as a site evacuation, the Contractors sign in/sign out book can be used by the emergency evacuation personnel to account for the presence and safety of Contractors on site following evacuation.
- Contractors are issued with a visitors badge or some other form of designation, which will identify them as bona fide and approved visitor to the site.

Access control of Contractors to the company site permits monitoring checks to be made in relation to the Contractor's plant and equipment to ensure:

- Electrical equipment is in tag and test date;
- Portable RCD safety switches are provided;
- Welding gas cylinders are fitted with flash-back arrestors;
- Prohibited or discouraged tools/equipment are not brought onto site;
- The Contractor has or is supplied with appropriate personal protective equipment.

### 4.6.3. Contractor Monitoring and Compliance

The Contractor Manager is responsible for ensuring an adequate level of day-to-day monitoring of Contractor personnel, depending on the work to be carried out, the nature of the hazards and the risks involved.

Consequences of repeated non-compliance will include removal of personnel from the contract work or, for a significant issue, removal of the Contractor from the Contract Register.

Any incidents occurring during the work should be fully investigated according to the incident investigation procedure (ID 113 Managing Environmental, Health, Safety and Risk (EHSR) Incidents) in consultation with the Contractor and their employees.

ViisiSafe must be used to ensure:

- Contract personnel are re-inducted;
- Insurance details are updated;
- Licence and other qualification details are updated; and
- The Contractor's company details are updated.

## 4.7. Contractor's Checklist

Once a Contractor has been appointed to undertake Minor Projects and/or Minor Works and their services are required thereafter, the Contractor must complete the *Contractor Checklist - Minor Works or Projects* and submit it to the Contract Manager before commencing work.

#### 4.8. System Review and Reporting

An internal audit of the Contractor Management system is to be carried out at each mill at least annually to determine the effectiveness of the procedure and level of compliance. The frequency may be increased depending upon the level of compliance.

Compliance with completing the Contractor's Checklist is to be reported on each month by the site management team and reported monthly.

### 5. RESPONSIBILITIES

Position	Responsibility
Accounts Payable	Ensure that all approved Contractors are set up in RENCS.
Contract Manager	Ensure compliance with this procedure when appointing and managing Contractors.
HSE Officers	Monitor contractor activities to ensure workers and other persons at the site are not exposed to WHS risks from Contractor activities. Providing advice on Contractor selection to ensure adequate and robust safety systems are in place. Assist in the review and assessment of Contractors' safety plans, risk assessments, safe work method statements, safe work procedures and other risk control tools to ensure adequacy and appropriateness prior to the commencement of the work.
Operations Managers	Review Registered Contractors
Purchasing Manager	Maintain and update Registered Contractor details in the Contractor Register in ViisiSafe.
Senior Site Management Team	Ensure Contractor selection and management is in accordance with this procedure. Ensure all procedures are in place to prevent workers and others from being exposed to WHS risks from Contractor activities.

### 6. REFERENCE DOCUMENTATION

Contractor Application Form  
 Contractor Checklist – Major or Significant Works and Projects  
 Contractor Checklist – Minor Works or Projects  
 Contractor General Induction  
 Contractor Register (ViisiSafe)  
 Registered Plant Checklist  
 Request for Tender  
 Sunshine Sugar Tendering Policy  
 Managing Environmental, Health, Safety and Risk (EHSR) Incidents

### 7. REVIEW AND AMENDMENT HISTORY

This document will be reviewed every three years, or more frequently depending on changes in legislation, corrective actions arising from incidents or to aid in continuous improvement.

### 8. COMMUNICATION AND TRAINING

This document requires:

Communication
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