



SAFETY MANAGEMENT PLAN

ETA RECRUITMENT GROUP

ETA-SAF-PLAN

Date Issued	Author	Approver
20/02/2022	Tony Arambasic	Jeff Smith

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1. Purpose

ETA Recruitment Group (ETA) including its subsidiaries, is committed to providing a safe work environment for all of our labour hire personnel and ensuring contractual as well as legislative compliance. This is achieved through the implementation of an effective management system and processes that demonstrate improvement.

In addition to meeting ETA's criteria as outlined in this plan, ETA personnel operating at our host company workplaces shall adhere with their safety management systems.

2. Scope

This Safety Management Plan is designed for ETA's recruitment business, ensuring and demonstrating safety responsibility when placing our people at client workplaces.

This Safety Management Plan is aligned to the ETA Policies. This Plan reflects its integrated approach to Safety management by first describing the components of the Company's management system and how it is applied to operational activities, and then provides an overview of controls associated with quality, health, and safety management.

Through the implementation of an integrated system for managing Safety performance, ETA ensures that the quality of the products and services it provides is maintained at a high standard.

This plan has been developed with primary consideration to, the Occupational Safety and Health Act 1984, the Occupational Safety and Health Regulations 1995.

This plan further aligns to the following standards:

- ISO45001:2018 – Occupational Health & Safety Management Systems
- ISO31000:2018 – Risk Management Systems, and
- ISO9001:2016 – Quality Management Systems.

Compliance to this plan, appendices and other referenced documents is mandatory. Our labour hire workers shall adhere with the requirements of this plan when operating at a host client's workplace / facility.

3. Definitions & Abbreviations

Definitions

Blue Collar	Refers to our people who engage in hard manual labour, typically manufacturing, construction, mining, or maintenance. The blue-collar worker may be skilled or unskilled. Blue Collar placements are predominantly undertaken by the Engineering Trades Australia and Construction Trades Australia subsidiaries.
Corporate Team	This is the ETA Recruitment Group and its subsidiaries consisting of the Managing directors and the Management Team.
Safety	Safety refers to the following items: Occupational Safety, Health, Quality and Training.
Serious Potential Incident	Any incident which is rated level 3, 4 or 5 as per the Risk Matrix.
Risk Assessment	A process to systematically identify all risk factors associated with a task / item of equipment / process and put appropriate controls in place to reduce the risk.
White Collar	Refers to workers who perform professional, desk, managerial, or administrative work. White-collar work may be performed in an office or other administrative setting. White Collar placements are predominantly undertaken by the Donnelly Smith Recruitment subsidiary.
Workplace	Operational site where ETA employees undertake work for host companies.
Host Company	Company and workplace where ETA workers undertake duties.
Our People	Labour Hire personnel employed by ETA (including its subsidiaries) to undertake paid duties at host company workplace(s).

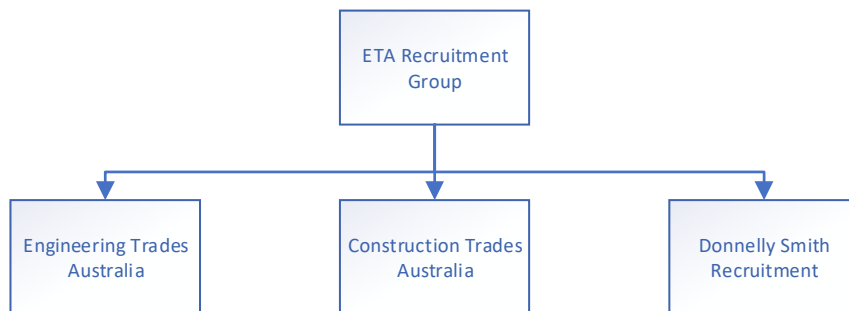
Abbreviations

PPE	Personal Protective Equipment
PRA	Personal Risk Assessment
TNA	Training Need Analysis
SWP	Standard Work Procedure
VOC	Verification of Competency
ETA	ETA Recruitment Group
IP	Injured Person
OHS	Occupational Health & Safety

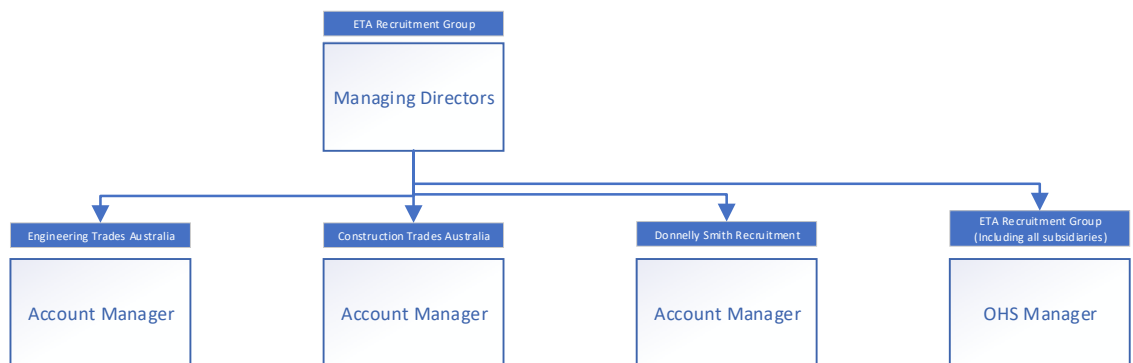
4. Leadership

The delivery of Safety Management excellence requires visible leadership across the ETA team. The ETA Directors are responsible for demonstrating proactive Safety Management through to the teams managing the labour hire workers.

4.1 Business Organisational Chart



4.2 Organisational Chart



4.3 Leadership Responsibilities – Managing Director

Managing Directors oversee all ETA Recruitment Group operational activities across all subsidiaries.

- Demonstrating leadership and commitment to the achievement of Safety Management objectives and initiatives;
- Actively monitor and review the management of critical and reported hazards;
- Ensuring risk is addressed within the scope of the business;
- Ensuring Host Companies are assessed regarding risk management and responsibility.
- Ensuring that all personnel comply with their responsibilities to provide information, instruction to work in a safe, responsible manner;
- Ensuring that all incidents in his / her area of responsibility are reported and investigated in accordance with corporate requirements;
- Ensuring reported hazards identified are addressed accordingly;
- Provide means to work with all stakeholders in addressing reported hazards in an effective manner;
- Ensuring that facilities and equipment are being used safely and that appropriate work methods are being applied;
- Intervening if an unsafe / irresponsible act or behaviour is observed;
- Ensuring that workplaces are by a competent person to ensure that the workplace is safe for persons working there;
- Ensuring compliance with company safety Policies, Procedures and Protocols;
- Ensuring that recruitment of labour hire workers is undertaken in compliance to this management plan; and
- ETA Contractors comply with the requirements outlined in this Management Plan, and its accompanying processes.

4.4 Leadership Responsibilities – Account Managers

The following responsibilities are applicable for all Account Managers working at all ETA Recruitment Group Subsidiaries.

- Understanding and applying Safety Management requirements;
- Understand the hazards involved in the roles being presented to the Labour Hire Workers and ensure the Host Company Safety Systems are evident;
- Utilising the resources provided and the processes in place for the achievement of Safety Management objectives;
- Regarding Safety Management as a central theme in their actions;
- Issuing protective clothing supplied as appropriate; and
- Escalating any matters relating safety, including hazards, safety issues, injury and/or illness.

4.5 Leadership Responsibilities – OHS Manager

- The developing and maintaining systems and processes for managing Safety;
- Implementing systems for communicating and managing changes that may affect health and safety to Labour Hire Workers;
- Compile and manage Hazard registers for the ETA business;
- Ensuring the management teams are aware of their responsibilities and their deliverables in terms of both work output and their personal behaviours towards health and safety of Labour Hire Workers;
- Maintaining knowledge of current governing regulations, codes and practices, and inform the management team's whenever revisions to this Plan is required;
- Understanding and apply legislative Safety Management requirements for the recruitment and labour hire business;
- Providing timely advice to the management teams regarding opportunities to achieve the highest standards of safety management;
- Demonstrating leadership and commitment to the achievement of Safety Management objectives, and to the success of ETA;
- Providing Safety Management topics and other information to key personnel ensuring open communication to the recruitment team;
- Actively promoting Safety Management excellence and the Safety Management vision and so create a strong Safety Management culture;
- Challenging unsafe behaviour and correcting inappropriate Safety Management performance;
- Applying a full working knowledge of all applicable Safety Management Systems;
- Monitoring and reviewing site safety inspections;
- Ensuring and assisting in the undertaking of incident investigations where required (by the Host Company); and
- Generating contingency plans to respond to injury and/or illness to ETA Labour Hire Workers.

5. Planning

ETA is committed to excellence in Safety Management and views this commitment as central to everything it does. All work practices and procedures must take Safety Management performance into account.

5.1 Policy



WORPLACE HEALTH & SAFETY POLCY

ETA Recruitment Group including its subsidiaries (ETA) values a safe workplace environment and is committed to ensuring personnel are operating in a workplace where hazards are addressed, where possible eliminated. Through effective management of workplace health & safety as well as continual, open communication with our clients we aim to provide employment opportunities to our people with a knowledge of risk mitigation practices being addressed.

ETA aim to:

- Conduct our business in a healthy, safe and sustainable manner for the benefit of all our employees and stakeholders.
- We promote Workplace Health & Safety as a value rather than a priority.
- Comply and exceed where reasonably practicable all applicable laws, standards and codes of practice.
- Continually review workplace environments ensuring employees are operating at a workplace which manages risk, addresses hazards and values constructive feedback.
- Treat all employees and stakeholders with dignity, care and respect as well as recognising achievements to promote successful outcomes of work groups and individuals.

We, as ETA shall continue to take a proactive approach towards ensuring a safe work environment for all employees and recognise that the value in safety is communicated to our employees.

Jeff Earnshaw-Smith
Managing Director
March 2022

Ross Donnelly
Director
March 2022

5.2 Key Performance Indicators

- 100% of workplace inspection completed for all blue-collar and white-collar placements placements. NOTE: this is not required for permanent placements only ones which are employed by ETA to undertake duties for a host company.
- 100% of all incidents reported to ETA from Host Companies to be documented and addressed ensuring worker injuries/illnesses are addressed.
- All employees are contacted on a routine basis providing an opportunity to provide feedback on safety conditions with their host company.
- 100% of all hazards with are formally reported ETA are followed up ensuring an outcome is communicated to all key stakeholders.

6. Hazard & Risk Management

Hazard and Risk Management processes are pivotal in ensuring our workers are placed in workplaces which actively acknowledge and address risk in the workplace. ETA addresses risk by utilising the Hierarchy of Control and detailing steps on addressing items in a systemic manner.

6.1 Procedures

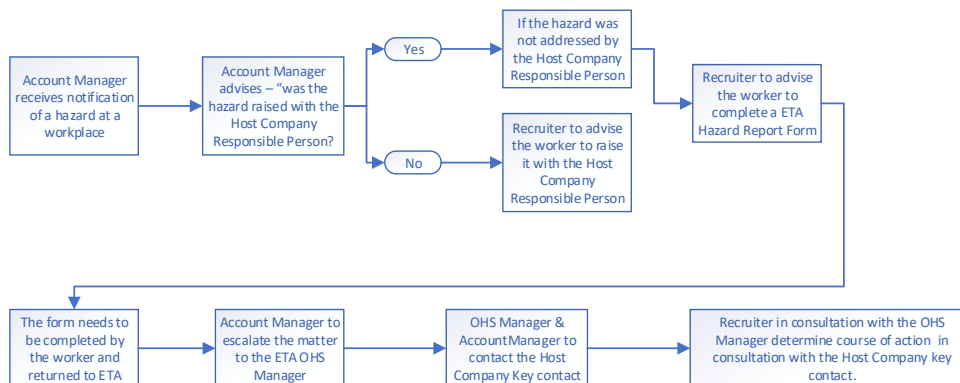
Procedures are high-level documents which describe system process within the ETA business. The ETA procedure catalogue defines the minimum standards and compliments this Plan.

6.2 Risk Assessment

ETA shall ensure a relevant and up to date risk assessment is completed and maintained documenting activities workers undertake ensuring risks are understood and addressed prior to placement on a host company workplace. Risk assessments shall be completed using the ETA Hazard Risk Assessment Template and be broken down into separate roles which ETA undertakes recruitment for.

6.3 Hazard Reporting

ETA Labour Hire Workers will be required to report hazards immediately to their Host Company as per the Host Company Hazard Reporting protocols. In situations where a worker's hazard report has not been addressed and has been escalated to the Account Manager, the below flow chart shall be adhered to:



The ETA hazard Report Form shall be made available to all Labour Hire Workers.

7. Compliance & Monitoring

7.1 Workplace Inspection

Host companies shall be inspected using the ETA Workplace Inspection form with respect for blue-collar and white-collar placements ensuring that the workplace demonstrates responsibility toward addressing and managing risk within the workplace.

7.1.1 The following items shall be reviewed for Blue Collar Inspections

- Management Systems
- Training & Induction
- Personal Protective Equipment
- Communication
- Incident Management
- Fitness for Work
- Risk Management
- Adverse Situation Management; and
- Amenities

All items are scored as per the following:

3	Documented evidence indicates awareness indicates this is effectively and consistent undertaken with formalised process and records – fully documented system and records.
2	Substantial evidence indicates awareness, commitment and undertaking however some gaps are apparent – some written processes were evident.
1	Some evidence to indicate awareness, commitment, or effective undertaking of this process – Largely undocumented process but some behavioural safety compliances noticed.
0	Minimal to no evidence to indicate awareness, commitment, or effective undertaking of this process – Largely undocumented process.
N/A	Question is not relevant.

ETA does not operate on a base line scoring system, as the risk may present where a host company scores high in all areas except for one. The scoring is designed to provide the ETA team an understanding of the level of compliance / outcome because of the review of checklist undertaken.

Upon the checklist being completed, the person undertaking the inspection shall ensure to share findings with the ETA key stakeholder and determine the suitability for labour hire placement.

NOTE: ETA Workplace Inspections are not intended to provide host companies with a list of actions to address, ETA may offer the findings to the host company where it is requested.

7.1.2 The following items shall be reviewed for White Collar Inspections

- Training & Induction
- Communication
- Issues Resolution
- Incident Management
- Fitness for Work
- Amenities
- All items are scored as per the following:

Evident	Indicates awareness that process is undertaken and formalised process and records.
Not Evident	No indication of process, either formal or informal or commitment to undertake.
N/A	Question is not relevant.

- This process can be undertaken by the Account Manager following successful completion of the training, ‘Undertaking White Collar Inspections’ (ETA-SAF-TRN);
- Upon the checklist being completed, the person undertaking the inspection shall ensure to share findings with the ETA key stakeholder and determine the suitability for labour hire placement;
- Should the Account Manager find any discrepancy, they are required to contact the OHS Manager for assistance in the matter; and
- NOTE: ETA Workplace Inspections are not intended to provide host companies with a list of actions to address, ETA may offer the findings to the host company where it is requested.

7.2 Audits

From time to time, external third-party auditing at ETA may take place e.g., regulatory reviews. The ETA will shall be notified prior to any third-party audits being undertaken.

8. Training & Competency

The training requirements of Labour Hire Workers shall be identified and documented to ensure the training requirements are achieved for host company placement. Labour hire workers will be required to adhere with all host company workplace induction and other training protocols.

8.1 Blue Collar - Induction

All blue-collar labour hire workers shall successfully complete the ETA Labour Hire Induction which shall detail the requirements of this plan as well as expectations for the person when working for ETA at a host company workplace.

See: ETA Induction (for Engineering Trades Australia & Construction Trades Australia) (ETA-TRN-PRE).

8.2 White Collar – Induction

All white-collar labour hire workers shall successfully complete the ETA Labour Hire Induction which shall detail the requirements of this plan as well as expectations for the person when working for ETA at a host company workplace.

See: Donnelly Smith Induction (ETA-TRN-PRE).

8.3 Legislative Construction Induction

Labour hire workers who are required to undertake construction work are required to attend and successfully complete the Construction Awareness Induction (Blue / White Card) conducted by a Worksafe approved registered training organisation prior to mobilising to the construction site.

8.4 Training Records

All training records shall be maintained in the ETA online shared folders. As a minimum, our training records should include details on who has been trained, what the training course covered, what competencies or qualifications were achieved or obtained and the identification of the provider.

ETA shall provide the Host Company a copy of Labour Hire Workers training records to ensure competency relevant to the task they are undertaking.

9. Communication & Consultation

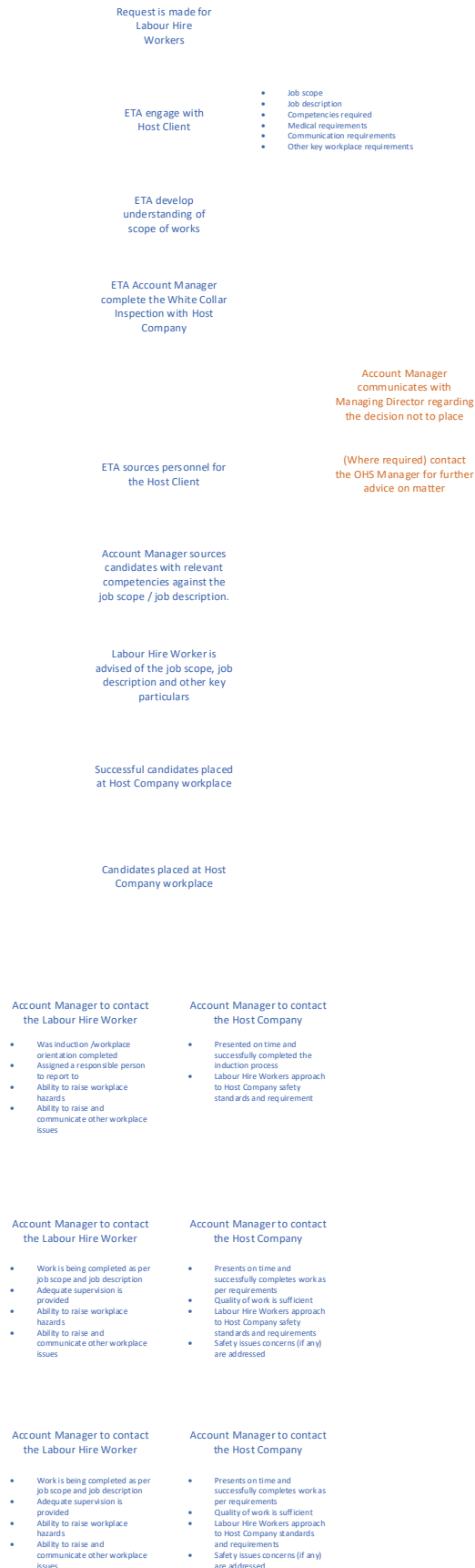
9.1 Blue Collar Placements



Continuous improvement in Safety Management performance will be driven by improved communication and consultation at all levels across the ETA business. This is achieved by engagement in Safety management through the mechanisms outlined in this section.

The flow chart (shown left) details the process with detailing key communication requirements between the Host Company and the ETA Labour Hire Worker (Blue Collar).

9.2 White Collar Placements



Continuous improvement in Safety Management performance will be driven by improved communication and consultation at all levels across the ETA business. This is achieved by engagement in Safety management through the mechanisms outlined in this section.

The flow chart (shown left) details the process with detailing key communication requirements between the Host Company and the ETA Labour Hire Worker (White Collar).

9.3 Consultation

Consultation is an important process and requires effective two-way communication to ensure the transfer of information. ETA shall ensure to provide effective two-way communication to:

- Our Labour Hire Workers (operating in both white-collar and blue-collar roles); and
- Our Host Companies

As a minimum, our Labour Hire Workers shall be consulted on Safety Management matters where:

- Changes that may affect Safety Management is proposed, including changes to the premises where our people work, changes to systems or methods of work and/or changes to protocols used for work;
- Updates to workplace requirements and protocols;
- Decisions made that may affect how ETA employees operate on site, and
- Updates to training / competency requirements for the task Labour Hire Workers are undertaking.

9.4 Placement Progress

Continual placement progress communication is a vital part ensuring open communication between:

- Our Labour Hire Workers
- Our Host Companies

The following shall detail the expected communication method ensuring the placement(s) of labour hire workers are meeting the host company safety expectations. (see flowchart above – section 9.1 and 9.2)

9.4.1 Labour Hire Worker

Communication by ETA to the Labour Hire Worker:

- Within 48 hours of placement;
- After 1 week of placement, and
- Every month thereafter placement.

The purpose of the communication is to provide the worker an opportunity to communicate any issues or key items that require addressing, such as:

- Onboarding process;
- General safety standard of the workplace;
- Appointment of a responsible person, and
- Ability to raise and communicate workplace hazards and other workplace issues to the responsible person.

9.4.2 Host Company

Communication by ETA to the Host Company:

- Within 48 hours of placement;
- After 1 week of placement, and
- Every month thereafter placement.

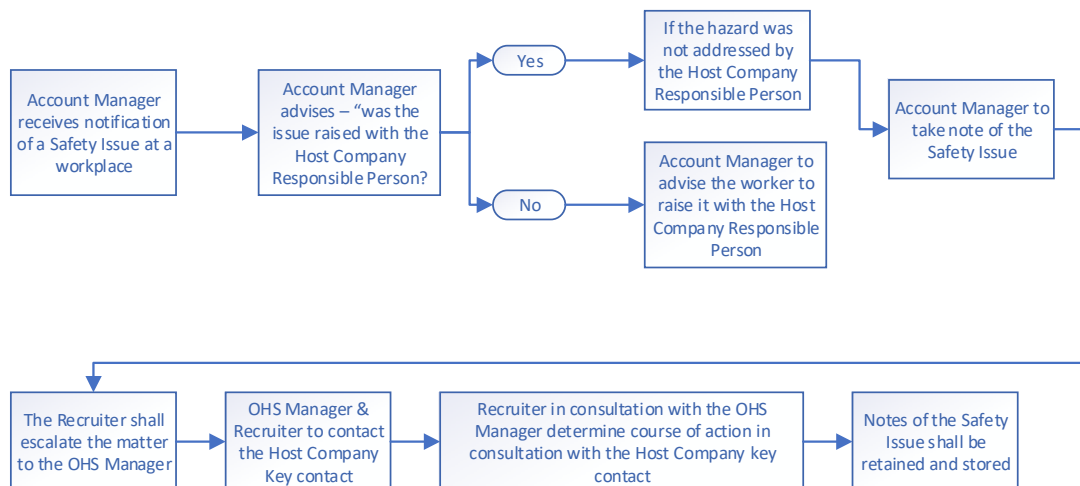
The purpose of the communication for Host Company to an opportunity to communicate any issues or key items that require addressing, such as:

- Workers onboarding process;
- Quality of output;
- Understating of job/task requirements;
- Approach to Host Company safety standards and requirements, and
- Proactive team member regarding health and safety matters.

Placement progress communication with the Host Company is to ensure that the Labour Hire Worker is undertaking the role as required and contributing in a safe and proactive manner

9.5 Safety Issue Resolution

In circumstance where our Labour Hire Workers with issues relating to Safety Management shall first attempt to resolve them with their Host Company responsible person and/or Safety and Health Representative (where this is provided). Where a resolution cannot be achieved, the safety issue shall be escalated to the Account Manager, the below flow chart shall be adhered to:



Grievance handling process shall be addressed as per regulatory legislation relevant to the state ETA Labour Hire Worker(s) are operating in.

10. Field Management – Blue Collar Workers

10.1 High Risk Work

In circumstances where the Host Company has a requirement for Labour Hire Workers to undertake High Risk Works, ETA shall only assign personnel who hold the relevant skills and appropriate High Risk Work License. This includes the following high risk work activity:

- Scaffolding - basic, intermediate and advanced;
- Rigging work- dogging; basic, intermediate and advanced rigging;
- Crane and hoist operation – tower; self-erecting tower; derrick; portal boom; bridge and gantry; vehicle loading; non-slewing mobile; slewing; materials hoist; personnel and materials hoist; boom-type elevating work platform; vehicle-mounted concrete placing boom;
- Forklift operation – forklift trucks; order-picking forklift trucks; and
- Pressure equipment operation - basic, intermediate and advanced boiler operation; turbine operation; reciprocating steam engine operation.

Copies of these licenses shall be uploaded into the ETA database forwarded to the Host Company upon request relevant to the task being undertaken.

10.2 Other High-Risk Works

Task which requires ETA Labour Hire Workers to undertake works as deemed high risk by the Host Company risk assessment shall be undertaken by workers who hold the relevant licences and competencies. Copies of these licenses and competencies shall be obtained from the Labour Hire worker and uploaded into the ETA database then forwarded to the Host Company upon request relevant to the task being undertaken.

10.3 Personal Protective Equipment

ETA has a requirement to supply Labour Hire Workers a minimum level of Personal Protective Equipment (PPE) as per the task being undertaken at the Host Company workplace. ETA will request information relating to the works being undertaken by the Labour Hire Workers ensuring to meet minimum PPE requirements.

ETA Labour Hire Personnel are expected to always adhere with Host Company PPE requirements.

11. Health & Wellbeing

11.1 Pre-employment Medicals

ETA Labour Hire Workers shall be assessed to ensure they are medically fit to undertake the job task or role they are employed for by undertaking appropriate pre-employment medical and physical fitness assessment for defined job roles. The assessment will be conducted by a qualified third-party medical provider and shall be undertaken as per the Host Company corporate / site specific requirements. ETA shall request the type of medical assessment required upon engagement with the Host Company.

11.2 Alcohol & Other Drugs

ETA Labour Hire Workers shall adhere with the Host Company policy / procedure / protocol regarding alcohol and other drugs. This shall include participation in a scheduled and/or random screening at the discretion of the Host Company.

In circumstances where ETA is notified of an ETA Labour Hire Worker failing or refusing to provide a sample for the purposes of an alcohol and/or drug screen, the ETA Labour Hire Worker shall adhere with the Host Company requirements and with may result in termination of employment.

11.3 Personal Hygiene

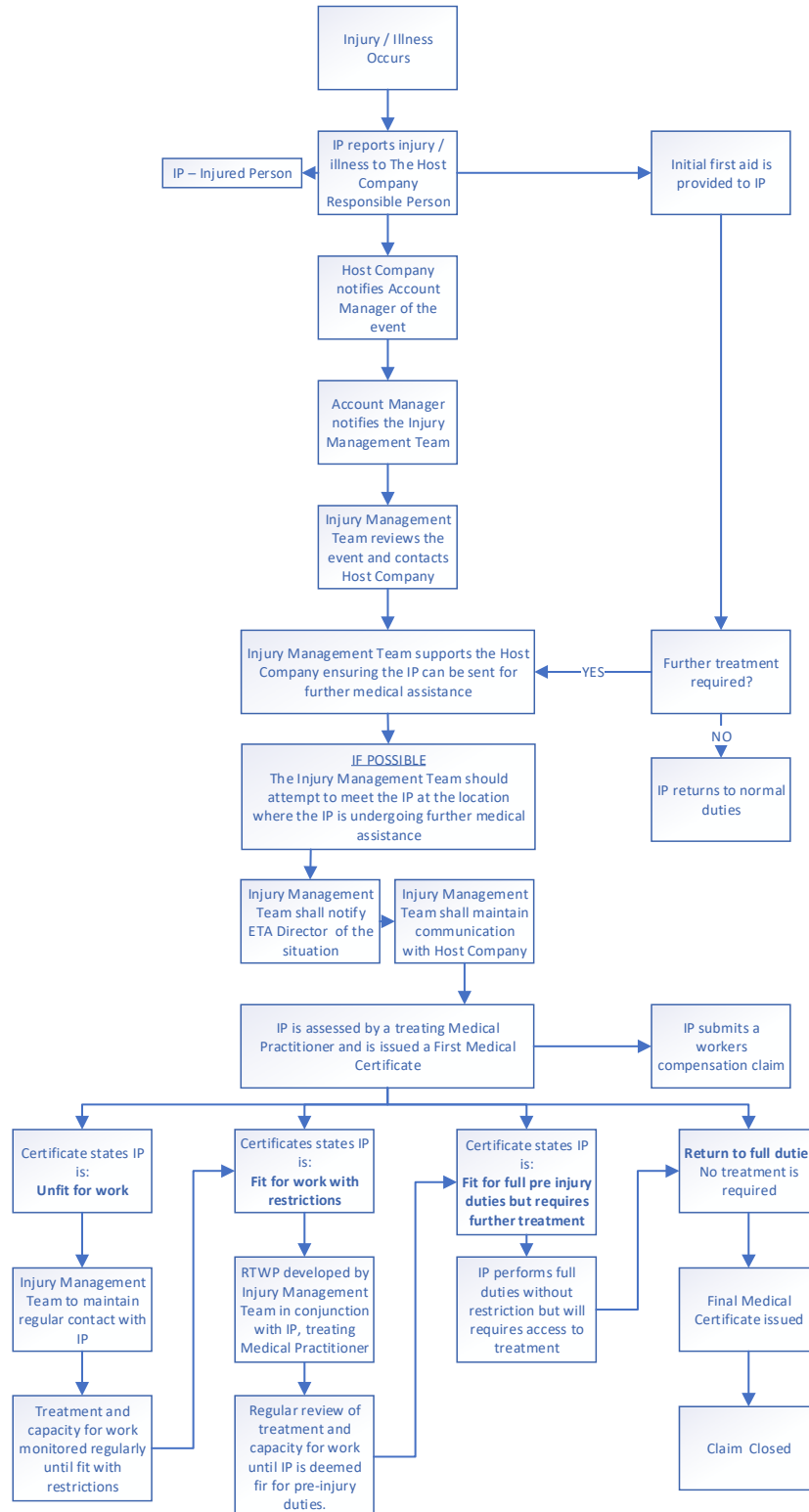
ETA Labour Hire Workers are to present to work, each shift in a clean and hygienic manner. This includes adhering with the Host Company's requirements in safe hygiene practices.

In circumstances where ETA is notified of a Labour Hire Worker failing to adhere with the Host Company safe hygiene practices may result in termination of employment.

12. Injury Management

Upon at ETA being notified that a Labour Hire Worker has sustained a workplace injury, the priority is to ensure the IP is seen to by the appropriate level of medical assistance required. ETA will request a copy of the incident report relating to the IP's injury to support workers compensation claim requirements.

All injuries or Illness events shall be addressed as per the following flow chart:



12.1 Worker Compensation

All IPs are entitled to submit a claim for workers' compensation. All workers' compensation claims shall be dealt with by the Injury Management Team in accordance with the Workers' Compensation and Injury Management Act (1981). It is the IPs and ETA's responsibility to ensure that all relevant workers compensation claim forms have been fully completed and along with all supporting documentation, submitted to the Injury Management Team. The Injury Management Team will forward all relevant information to the Insurer in order for the Insurer to make an informed decision regarding acceptance of liability for the workers' compensation claim.

13. Emergency Preparedness

ETA Labour Hire Worker shall be required to participate in all Host Company Emergency Preparedness drills. In circumstances where ETA is notified of a Labour Hire Worker failing to adhere with the Host Company emergency drill practices may result in termination of employment.

14. Continual Improvement

ETA Directors shall review this Safety Management Plan annually, as a minimum, ensuring its continued suitability, adequacy and overall effectiveness. The review shall seek opportunities for improvement, the need for changes in the system, and the continued validity of the relevant ETA policy as well as established objectives.

Outcomes of the review shall be communicated to key stakeholders, recorded and maintained. Any identified actions shall then be managed using the relevant actions tracker.

15. Documents & Records Management

All ETA documents shall be controlled, archived with records management in accordance with the ETA Document Control Procedure.

16. References

**Act / Regulation /
Standards**

Mines Safety and Inspection Act 1994

Mines Safety and Inspection Regulations 1995

Occupational Safety and Health Act 1984

Occupational Safety and Health Regulations 1986

Workers Compensation and Injury Management Act 1981

ISO45001:2018 Occupation Health & Safety Systems

ISO9001:2016 Quality Management Systems

ISO31000:2018 Risk Management
