

# DRAFT - Procedure

## Corrective & Safety Actions



### Summary

- Work health and safety (WHS) monitoring and review activities may produce findings that require action to address safety deficiencies or non-conformances, and other opportunities for improvement.
- Actions to address the intent of findings will be determined by the responsible manager or risk owner, with consideration given to:
  - inherent and residual risk;
  - what is reasonably practicable; and
  - potential new hazards arising from actions.
- The Safety Section will administer the Corrective Action Database, including through the issuance of findings and recommended actions, and based on status updates from responsible managers.
- Actions must be assigned to a responsible person to be implemented and closed within an agreed timeframe, which may be subject to change where necessary.
- All actions must be documented, with evidence to demonstrate that the intent of the finding has been addressed before they are closed.
- Closed actions must be reviewed by the responsible manager to ensure they continue to be effective and address the intent of the finding.
- Reports of open, closed and overdue actions will be provided to the DPTI Executive Group by the Safety Section as required.

## 1. Purpose

This procedure details the process for managing findings associated with work health and safety (WHS) related monitoring and review activities.

## 2. Scope

This procedure applies to all DPTI workers.

Rail Commissioner assurance activities are out of scope of this procedure.

## 3. Procedure detail

### 3.1 Findings

Findings identified through various monitoring and review activities are to be actioned according to *Table 1*.

*Table 1: Response to findings identified through monitoring and review activities*

ACTIVITY	ACTIONS	DISTRIBUTED TO	IS A RESPONSE TO THE FINDINGS REQUIRED?	
			No	Yes
Internal WHS audits	Corrective actions	Responsible Manager	A justification must be documented in the Corrective Action Database (CAD)	<p>The audit team will provide a corrective action plan (CAP) addressing all findings.</p> <p>The responsible manager must:</p> <ul style="list-style-type: none"> <li>finalise corrective actions;</li> <li>prioritise corrective actions based on risk;</li> <li>assign responsible person/s to action and close corrective actions; and</li> <li>document completion due dates.</li> </ul>
WHS investigations	Safety Actions	Risk Owner	A justification must be documented in the Corrective Action Database (CAD)	<p>The investigation team will provide findings and recommended safety actions to the risk owner for approval.</p> <p>If the risk owner is satisfied that the safety actions are appropriate (i.e. achievable and address the intent of the finding), they will:</p> <ul style="list-style-type: none"> <li>approve the safety action plan;</li> <li>allocate safety actions to a responsible manager; and</li> <li>monitor outstanding actions for which they are accountable.</li> </ul>

ACTIVITY	ACTIONS	DISTRIBUTED TO	IS A RESPONSE TO THE FINDINGS REQUIRED?	
			No	Yes
Workplace inspections	Corrective actions	Responsible Manager	Document completed workplace inspection in register	The responsible manager must: <ul style="list-style-type: none"> <li>• prioritise corrective actions based on risk;</li> <li>• assign responsible person/s to action and close; and</li> <li>• document completion in register.</li> </ul>
Safety walks	Recommendations	Responsible Manager	Document completed safety walk in register	The responsible manager must: <ul style="list-style-type: none"> <li>• assess recommendations and determine any required actions;</li> <li>• prioritise issues arising from observations based on risk;</li> <li>• assign responsible person/s to action and close; and</li> <li>• document outcomes in register.</li> </ul>
Risk assessments	Treatments	Responsible Manager	Treatments to be placed in CAD database	The responsible manager must: <ul style="list-style-type: none"> <li>• prioritise issues arising from treatments based on risk; and</li> <li>• assign responsible person/s to action and close treatments.</li> </ul>
<p>Serious hazards shall be reported to the relevant manager immediately. Identified hazards that cannot be remedied immediately <b>MUST</b> be entered into the <a href="#">Hazard and Incident Reporting Module (HIRM)</a>.</p> <p>Workgroups that do not have access to a computer to report a hazard, near miss, incident or injury in HIRM must complete a <a href="#">hard copy report form</a>, with the information entered into HIRM by their manager/supervisor.</p>				

Findings will be risk assessed and will include recommendations for controls, where required to address safety deficiencies and non-conformances, or any other identified opportunities for improvement.

The responsible manager must give consideration to potential new hazards arising from actions, and co-ordinate the implementation of actions to address the intent of the finding whilst ensuring the residual level of risk is acceptable, in consultation with affected workers and/or their Health and Safety Representatives (HSRs) as required.

### 3.2 Action

The responsible person must:

- implement and close any assigned actions within an agreed timeframe; and
- document progress and supporting evidence.

The implementation of actions will be prioritised based on the level of risk associated with the finding, as determined through the monitoring and review activity from which it is derived.

The responsible person may request an extension to the completion due date by providing justification to the responsible manager. Any changes to the completion due date, including the justification, must be documented in the Corrective Action Database (CAD).

The responsible manager must advise the Safety Section when actions are closed, to ensure that the CAD remains up to date.

### 3.3 Monitor

The responsible manager will assign a responsible person to implement all actions and monitor progress.

The Safety Section is responsible for:

- reviewing progress to address identified actions, including the number of open actions, overdue actions and actions closed within the reporting period; and
- reporting to the DPTI Executive Group.

### 3.4 Close actions

The Responsible Manager:

- must ensure actions are closed once the responsible person has provided evidence that the findings have been addressed;
- may request guidance from the originator of the finding (e.g. lead auditor or investigator) prior to closing the action; and
- will advise the Safety Section, who will update the CAD.

### 3.5 Review

Responsible managers must ensure that corrective and safety actions are reviewed within 12 months of implementation, and modified if required, to ensure that:

- they remain fit for purpose;
- they effectively address the intent of the finding; and
- any new hazards arising have been identified and controlled as required.

A review of any implemented corrective or safety actions may also be triggered by:

- a similar occurrence to that which prompted the initial finding; or
- any unforeseen risks that the action/s should have adequately controlled.

## 4. Record management

- This procedure will be subject to review every three years by the DPTI Safety Section, or earlier if there has been a change in any legislation or government policy.
- Any records and documentation pertaining to this procedure must be maintained in accordance with legislative and DPTI record keeping processes. Refer to the [DP009 Recordkeeping Policy](#) for information regarding records management.
- Records must be retained, in accordance with the State Records of South Australia, [General Disposal Schedules](#).
- For further information refer to the [Information Management Unit](#).

## 5. Roles and responsibilities

ROLE	RESPONSIBILITIES
Chief Operating Officers, General Managers and Section Managers	<p>Must ensure:</p> <ul style="list-style-type: none"> <li>Managers/Supervisors are aware of their responsibilities in relation to the remote and isolated work procedure; and</li> <li>the requirements of this procedure are implemented within their Directorate/s.</li> </ul>
Risk Owner	<p>Must:</p> <ul style="list-style-type: none"> <li>approve safety actions arising from WHS investigations, or provide justification for non-approval of actions; and</li> <li>allocate safety actions to a responsible manager.</li> </ul>
Responsible Manager	<p>Must ensure:</p> <ul style="list-style-type: none"> <li>Corrective Action Plans (CAPs) are determined in consultation with the originator of the findings;</li> <li>agreed actions are practical and will constitute an effective response to address the intent of the finding;</li> <li>actions are implemented and closed in a timely manner, and prioritised based on risk;</li> <li>actions are allocated to a responsible person with the capacity to implement and close the action within the agreed timeframe;</li> <li>outstanding and closed actions are recorded and up to date in the Corrective Action Database (CAD); and</li> <li>closed actions are reviewed to ensure ongoing effectiveness.</li> </ul>
Responsible Person	<p>Must ensure:</p> <ul style="list-style-type: none"> <li>all actions for which they are allocated responsibility are implemented and closed within the agreed timeframe; and</li> <li>any actions that cannot be closed by the completion due date have been approved for extension by the responsible manager, and reflected in the CAD.</li> </ul>
Safety Section	<p>Must:</p> <ul style="list-style-type: none"> <li>conduct various WHS monitoring and review activities across the department;</li> <li>identify findings, including opportunities for improvement and safety deficiencies, and provide CAPs and safety actions as appropriate;</li> <li>determine agreed actions in consultation with responsible managers/risk owners to address these findings;</li> <li>maintain the CAD and monitor progress of outstanding actions; and</li> <li>report on status of CAD to the DPTI Executive Team as required.</li> </ul>
Managers/Supervisors	<p>Must:</p> <ul style="list-style-type: none"> <li>ensure CAPs and safety actions, and any changes to work processes and activities resulting from the implementation of these actions, are communicated to all affected workers; and</li> <li>adopt the responsibilities of a 'responsible manager' where required to support the implementation of actions within their areas of responsibility.</li> </ul>
Workers	<p>Must:</p> <ul style="list-style-type: none"> <li>support the implementation of actions, and implement changes to work processes as required to address safety deficiencies and/or opportunities for improvement in accordance with agreed actions;</li> </ul>

ROLE	RESPONSIBILITIES
	<ul style="list-style-type: none"> <li>if assigned responsibility for the implementation of one or more actions, assume the responsibilities of a 'responsible person', as outlined above; and</li> <li>conduct work activities safely, and in accordance with current WHS policies, procedures and other requirements.</li> </ul>

## 6. Definitions

TERM	DEFINITIONS
Chief Officers, General Managers and Section Managers	<p>Any person who:</p> <ul style="list-style-type: none"> <li>makes or participates in the making of decisions that affect the whole or a substantial part of DPTI and ensuring alignment with corporate governance and strategic operations is applied; and</li> <li>has the capacity to significantly affect DPTI's financial standing, or is the receiver or manager of any property of DPTI.</li> </ul>
Corrective Action	An action determined to be the most effective method of addressing a finding arising from an internal WHS audit, workplace inspection, or safety walk.
Corrective Action Database (CAD)	A central record of corrective action plans (CAPs) and safety actions that is maintained by the Safety Section.
Corrective Action Plan (CAP)	A step by step action plan to be implemented to address an identified weakness in the Safety Management System.
Findings	Opportunities for improvement, safety deficiencies or non-conformances as determined through WHS monitoring and review activities including, but not limited to, internal WHS audits and WHS investigations.
Managers/Supervisors	<p>Any person who has the responsibility, management or control of a DPTI workplace or work unit.</p> <p>Managers include, but are not limited to:</p> <ul style="list-style-type: none"> <li>Team Leaders;</li> <li>Unit Managers; and</li> <li>Coordinators.</li> </ul>
Risk Owner	A person with the accountability and authority to manage findings and safety actions arising from WHS investigations.
Responsible Manager	A manager/supervisor with the appropriate authority and capacity to finalise and implement corrective actions, or otherwise address the intent of any findings.
Responsible Person	A worker assigned responsibility for the implementation of particular corrective or safety actions
Safety Action	An action determined to be the most effective method of addressing a finding arising from a safety investigation.

Worker	<p>1) Any person who carries out work on behalf of DPTI as an:</p> <ul style="list-style-type: none"> <li>• Employee;</li> <li>• Trainee;</li> <li>• Volunteer;</li> <li>• Outworker;</li> <li>• Apprentice;</li> <li>• Work experience student;</li> <li>• Contractor or sub-contractor;</li> <li>• Employees of a contractor or sub-contractor; or</li> <li>• Employee of a labour hire company assigned to work for DPTI.</li> </ul> <p>2) Any person who undertakes rail safety work on behalf of the Rail Commissioner.</p>
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## 7. Supporting documentation

- [WHS Hazard Identification & Risk Management Policy](#)
- [Internal WHS Audits Procedure](#)
- [WHS Incident Reporting & Investigations Procedure](#)
- [Workplace Inspections Intranet Portal](#)
- [Safety Walks Intranet Portal](#)

## 8. References

- [Work Health and Safety Act 2012](#)
- [Work Health and Safety Regulations 2012](#)
- AS/NZS 4801:2001 – OH&S Management Systems: Specifications with guidance for use

## 9. Document Amendment Record

Date	Version	Revision Description
	1.0	New Document
Document Review Schedule		3 Yearly