

INTERNAL ONLY
ISLHD PROCEDURE
COVER SHEET



Health
Illawarra Shoalhaven
Local Health District

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FUNCTIONAL GROUP OR HUB	Work Health and Safety
NSQHS STANDARD	Standard One
SUMMARY	Procedure for establishing risk management systems relating to Work Health and Safety. Provides guidance for relevant system and forms required.

COMPLIANCE WITH THIS DOCUMENT IS MANDATORY

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1. POLICY STATEMENT

The Illawarra Shoalhaven Local Health District (ISLHD) has an obligation under the Work Health and Safety Act 2011 to provide a safe and healthy environment for all ISLHD staff, patients, and contractors (and their staff), as well as visitors to the hospital facilities, sites and community service areas under our management.

In addition, ISLHD shall implement the requirements under the NSW Ministry of Health, [PD2018 013 Work Health and Safety: Better Practice Procedures](#), providing a Work Health and Safety Management System (WHSMS) incorporating all facets of the risk management framework. This procedure has been developed as a guide to the implementation of the Work Health and Safety Risk Management framework within ISLHD.

2. BACKGROUND

The WHS Act 2011 and WHS Regulations 2017 require persons who have a duty to ensure health and safety by managing risks. This is achieved by the elimination of health and safety risks, so far as is reasonably practicable, and if it is not reasonably practicable to do so, to minimise those risks.

To comply with the legislation and meet government policy objectives, specific procedures must be in place for a systematic and planned approach to managing all reasonably foreseeable hazards and their associated risks. This can be achieved by identifying, assessing, and then eliminating or controlling workplace risks.

Specific concepts defining what is considered 'reasonably practicable' in the WHS Act 2011 are also explained within this procedure to guide the end user in appropriately applying WHS risk management decision-making

Definitions

ALARP - as low as reasonably possible

HAZARD - A hazard is anything that has the potential to cause harm to people, equipment, structures and/or the environment.

HAZARD ASSESSMENT - The process used to identify, assess, and eliminate or reduce workplace hazards.

HAZARD IDENTIFICATION - Formal recognition and documentation of hazards.

RISK MANAGEMENT - Risk management involves developing systems to identify and analyse hazards, and eliminate or minimise any harmful consequences. This promotes a systematic breakdown of a job into tasks/steps in order to identify hazards, assess risks, and select appropriate controls.

PROBABILITY - The likelihood of an accident occurring.

RISK - The risk is the probability - high or low - that somebody could be harmed by the identified hazard, considered in conjunction with how serious the harm could be.

RISK ASSESSMENT - Evaluation of the risks associated with each hazard.

RISK CONTROL - Reducing the Risk Level using barriers and controls.

3. RESPONSIBILITIES

3.1. Employees must:

- Participate in activities associated with the identification of WHS hazard(s).
- Notify management or other appropriate personnel of perceived hazard(s) at the work place.
- Attend training to develop an appropriate level of competence in risk assessment and risk management.
- Comply with the requirements of the Risk Management Procedures.

3.2. Line Managers must:

- Attend training to develop an appropriate level of competence in risk identification, assessment and control.
- Consistently identify hazards and assess risks, in consultation with workers, including when planning or undertaking development/refurbishment of the workplace, when procuring goods and services, and when staff are delivering services in the community.
- Implement controls to eliminate or minimise identified risk.
- Monitor the effectiveness of risk controls.
- Apply delegations for approving WHS related purchases to ensure that WHS matters are promptly addressed.
- Seek advice from Risk Managers and WHS staff concerning any exposures requiring health surveillance.

3.3. General Managers/ Service Directors must:

- Attend training to develop an appropriate level of competence in risk assessment and risk management.
- Consistently identify hazards and assess risks, in consultation with workers, including when planning or undertaking development/refurbishment of the workplace, when procuring goods and services, and when staff are delivering services in the community.
- Implement controls to eliminate or minimise identified risk.
- Monitor the effectiveness of risk controls.
- Apply delegations for approving WHS related purchases to ensure that WHS matters are promptly addressed.
- Seek advice from Risk Managers and WHS staff concerning any exposures requiring health surveillance

3.4. Chief Executive must:

- Ensure ISLHD has in place, and utilises, an appropriate process for identifying, eliminating or minimising risk and monitoring the effectiveness of these processes.
- Monitor compliance with WHS processes.
- Ensure ISLHD directs appropriate resources to ensure that risk is identified, eliminated, or minimised and monitored.

- Ensure managers/supervisors have the skills to identify hazards and assess, manage and monitor risks.
- Ensure assessing WHS implications forms part of, and is documented for, procurement processes.
- Ensure managers and supervisors have gone through an approval process that considers WHS ramifications of variations to new buildings and refurbishments.
- Establish that appropriate decision-making arrangements are in place to allow managers to implement controls or escalate decisions/approvals where the necessary controls fall outside the scope of their decision-making.

4. PROCEDURE

4.1. The risk management process

NSW Health has adopted the risk management process outlined in AS/NZS ISO 31000:2009 Risk Management – Principles and Guidelines. The Standard has more steps than those listed in the WHS Regulation and supporting Code of Practice, however, the intent of both processes is consistent.

The risk management process at the Illawarra Shoalhaven Local Health District (ISLHD) can be briefly described covering the following key stages:

1. Establishing the context.
2. Identifying the hazards.
3. Assessing/analysing the risks.
4. Eliminating or controlling the risks, considering the hierarchy of risk controls.
5. Monitoring and reviewing risks and controls.
6. Communicating and consulting during each step of the process

4.2. Establishing the context

4.2.1. What is risk management?

- Risk management involves developing systems to identify and analyse hazards, and eliminate or minimise any harmful consequences.
- ISLHD has obligations under the WHS Regulation to identify any foreseeable hazards that may arise in the workplace, and to manage the risk by eliminating the risk.
- Where elimination is not reasonably practicable, ISLHD must minimise the risk, as far as is reasonably practicable, by using control measures to reduce the risk of harm to the lowest possible level.
- The WHS Regulation provides a way of selecting the most effective types of controls by providing a hierarchy of risk controls.

4.2.2. What is a hazard?

- A hazard is anything that has the potential to cause harm to people, equipment, structures and/or the environment, such as workplace violence, hazardous chemicals, electricity, working from ladders or moving patients.

4.2.3. What is a risk?

- The risk is the probability, high or low, that somebody could be harmed by the identified hazard, considered in conjunction with how serious the harm could be.
- Risk is judged or assessed in terms of likelihood (how likely is it that the event will happen?) and consequence or impact (how bad will an event be if it happens?).
- Risk assesses who could be harmed and what the consequences would be.
- The assessment needs to consider hazards or risks that may cause harm to an individual in the future or has a latency period e.g. asbestosis following exposure to asbestos.

4.2.4. What is reasonably practicable?

Deciding what is 'reasonably practicable' to protect people from harm requires taking into account and weighing up all relevant matters, including:

- The likelihood of the hazard or risk concerned occurring.
- The degree of harm that might result from the hazard or risk.
- Knowledge about the hazard or risk, and ways of eliminating or minimising the risk.
- The availability and suitability of ways to eliminate or minimise the risk.
- The cost associated with available ways of eliminating or minimising the risk, including whether the cost is grossly disproportionate to the risk.

The degree of control an agency has over the hazard/risk will also impact on what is considered reasonably practicable.

4.2.5. Consultation with Workers

- Consultation with workers and their health and safety representatives is required at each step of the risk management process.
- By drawing on the experience, knowledge and ideas of workers you are more likely to identify all hazards with their associated risks, and choose effective control measures

4.3. Identifying the hazards

4.3.1. When to identify hazards

Managing work health and safety risks is an ongoing process that is triggered when any changes affect your work activities. You should work through the steps when:

- **Initially** if the hazard identification process has not been applied to the workplace, work activities or plant, equipment, tools, substances and other materials used or stored at work.
- **Prior** to changing work practices, procedures or the work environment.
- **Prior to introducing something new:**
 - Before introducing new plant, equipment, tools, substances or material, to the workplace.
 - When designing a new workplace or prior to occupying a new workplace.
 - Before introducing a new work activity, service etc.
- **Prior to altering something:**
 - Before altering the way a work activity is performed, or the way a service

- is provided.
- Before altering the design or layout of a workplace, or the way it is used, cleaned or maintained.
- Before altering the design of plant, equipment, tools or the way they are used, cleaned, inspected, maintained, disposed of etc.
- Before altering the way substances are used, handled, transported stored or disposed of.
- **When work is being carried out.** For example when conducting or supervising work activities.
- **Responding to workplace incidents.** When something occurs which did or could have harmed someone - for example as part of the incident investigation process.
- **When new or additional information becomes available.** Industry hazard alerts, manufacturer alerts and recall notices, general public hazard notifications.
- **Responding to concerns** raised by workers, HSRs or others at the workplace.

It is important to use the risk management approach when designing and planning products, processes or places used for work, because it is often easier and more effective to eliminate hazards before they are introduced into a workplace by incorporating safety features at the design stage.

4.3.2. How to identify hazards

Identifying hazards in the workplace involves finding objects, arrangements and situations that could potentially cause harm to people. Hazards generally arise from the following aspects of work and their interactions:

- Physical work environment.
- Equipment, materials and substances used.
- Work tasks and how they are performed.
- Work design and management.

There are a number of different methods that can be used to identify hazards. These methods include:

Inspect the workplace

- Regular walking around the workplace and observing how things are done can help predict what could or might go wrong. Look at how people actually work, how plant and equipment is used, what chemicals are around and what they are used for, what safe or unsafe work practices exist, as well as the general state of housekeeping.
- Hazards can be identified by directly observing the workplace, or the way work is done. For example: conducting workplace safety inspections, safety audits, walk through surveys, task hazard analysis etc.
- Refer to [ISLHD CORP F 230 - WHS Workplace Inspection Checklist](#).

Investigating incidents and analysing incident data

- Hazards can be identified by notification of hazards, near misses, injuries,

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workers complaints, sick leave and the results of investigation of incidents and/or analysing IIMS incident reports and workers compensation data.

- Refer to [ISLHD CORP PROC 81 WHS Incident Reporting and Investigation](#).

Reviewing product information

- Hazards can be identified by reviewing the product information supplied with substances, material, plant, equipment and tools such as Safety Data Sheets and instruction manuals.
- Refer to [ISLHD CORP PROC 52 - WHS Dangerous Goods and Hazardous Substances](#).

Ergonomics and Manual Handling

- Surveys of manual handling activities and workplace ergonomics are conducted to identify the associated hazards and to place in priority order the jobs or tasks that require risk assessment.
- Refer to [ISLHD CORP PROC 47 - WHS Manual Task Risk Management](#).

Reviewing workplace design

- Hazards can be identified by reviewing the design and layout of workplaces.

4.3.3. Hazard reporting

- Hazards must be reported as soon as identified, to ensure appropriate and timely action is taken.

4.3.4. Recording hazards

- All identified hazards that are unable to be eliminated immediately must be documented using the [ISLHD CORP F 238 - WHS Hazard Register](#).

4.4. Assessing/analysing the risks

4.4.1. Carrying out a risk assessment

- A risk assessment should be completed when:
 - There is uncertainty about how a hazard may result in injury or illness.
 - The work activity involves a number of different hazards and there is a lack of understanding about how the hazards may interact with each other to produce new or greater risks.
 - Changes at the workplace occur that may impact on the effectiveness of control measures.
- A risk assessment is mandatory under the WHS Regulations for high-risk activities such as entry into confined spaces and live electrical work.
- Some hazards that have exposure standards, such as noise and airborne contaminants, may require scientific testing or measurement by a competent person to accurately assess the risk and to check that the relevant exposure standard is not being exceeded.
- A risk assessment is not necessary in the following situations:
 - Where legislation requires some hazards or risks to be controlled in a

specific way, these requirements must be complied with regardless of the outcome of a risk assessment.

- Where a code of practice or other guidance material has already set out a way of controlling a hazard or risk that is applicable to your situation and you choose to use the recommended controls. In these incidents, the guidance material can be followed without a risk assessment being undertaken.
- Where there are well-known and effective controls that are in use in the particular industry that are suitable to the circumstances in your workplace. These controls can simply be implemented.

4.4.2. Assess the risk

- A risk assessment is a method of making an informed decision on the hazard that has been identified. This will allow us to assess the likelihood that someone will be harmed (injury or illness) from exposure to the hazard, and the consequences (severity of injury or illness) that could occur as a result of being exposed to the hazard.
- A risk assessment must be conducted for each identified hazard to:
 - Determine how severe the harm could be from each hazard.
 - Determine how the hazard may hurt you or cause harm.
 - Determine the likelihood of harm occurring.
 - Determine if anything else could combine with the hazard to cause an increase in the level of injury.
 - Decide who could be hurt and how badly they could be hurt.
 - Determine the existing control measures (if any) in place and how effective they are in controlling the risk of harm arising from the hazard,
- Obtain and review any relevant health and safety information that is reasonably available from an authoritative source, such as information supplied with the product/equipment, industry Codes of Practice, Australian Standards, or WorkCover guidance material.
- The information gathered in the risk assessment should then be evaluated to determine how likely it is that someone could be harmed by the hazard, and how severe the harm could be.
- The risks should then be prioritised for risk control based on the level of risk posed by the hazard (i.e. the likelihood of injury/illness occurring and the severity of the consequences) to allow for a prioritised planned control process.
 - The assessment of the level of risk should be conducted using the NSW Health Risk Matrix and using [ISLHD CORP F 45 - WHS Risk Assessment Form](#)

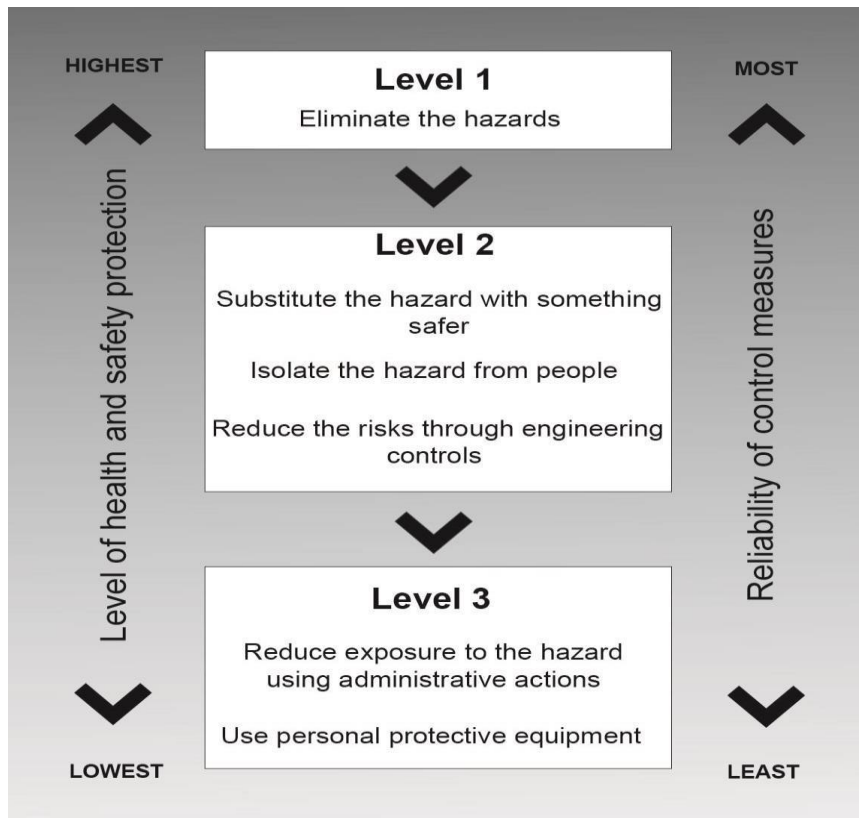
4.5. Eliminating or controlling the risks

4.5.1. Risk elimination or control

- The most important step in managing risks involves eliminating them so far as is reasonably practicable, or if that is not possible, minimising the risks so far as is reasonably practicable.

- The ways of controlling risks are ranked from the highest level of protection and reliability to the lowest, as shown in *Figure 1*. This ranking is known as the hierarchy of risk control. The WHS Regulations require duty holders to work through this hierarchy when managing risk.

Figure 1



- You must always aim to eliminate a hazard, as this is considered the most effective control. If this is not reasonably practicable, you must minimise the risk by working through the other alternatives in the hierarchy.
 - Substitution.
 - Isolation.
 - Engineering.
 - Administrative.
 - Personal Protective Equipment.
- If there are any legislated prescribed measures that need to be applied, such as applicable Codes of Practice or Australian Standards, then these should be incorporated in the risk management process.
- Based on the information gathered in the risk assessment, the following risk control decisions need to be made:
 - What needs to be done to eliminate the hazard: or minimise the risk of harm?
 - What level of residual risk will remain after these measures have been implemented?

- What first aid, emergency and contingency plans need to be in place should an injury/illness result from exposure to residual risk?
- Could we be creating any additional risk/s by the implementation of the proposed control measure/s?
- The results of the risk assessment and the risk control decisions must be communicated to all relevant employees affected by the control.
- All risks can be controlled and it is always possible to do something, such as stopping the activity or providing instruction to those exposed to the risk.
- The cost of controlling a risk may be taken into account in determining what is reasonably practicable, but cannot be used as a reason for doing nothing. The greater the likelihood of a hazard occurring and/or the greater the harm that would result if the hazard or risk did occur, the less weight should be given to the cost of controlling the hazard or risk.

4.5.2. Implementation of control measures

- Control measures that you put into operation will usually require changes to the way work is carried out due to new or modified equipment or processes, new or different chemicals, or new Personal Protective Equipment. It is then usually necessary to support the control measures with:
 - **Work procedures** – Develop safe work procedures that describe the task, identify the hazard and document how the task is to be performed to minimise the risks.
 - **Training, instruction and information** – Workers need to be trained in the work procedures to ensure they are able to perform the task safely. Assessment is required to show workers are competent in performing the task. It is insufficient to simply give a worker the procedure and ask them to acknowledge that they understand and are able to perform it.
 - **Supervision** – will depend on the level of risk and experience of the workers involved. High levels of supervision are necessary where inexperienced workers are exposed to the task.
 - **A risk register** should be prepared that lists identified hazards, what action needs to be taken, who will be responsible for taking the action, and within what timeframe.
- Management, in consultation with affected workers, must ensure that the risk control measures are implemented in a timely manner.
- Where the preferred measures cannot be implemented within a suitable timeframe (considering the level of risk presented by the hazard), interim measures must be put in place to control the risk until the preferred risk controls can be implemented.
- Management, in consultation with workers, must ensure that a Risk Control Action Plan is developed to document and coordinate the implementation of the risk control measures. Progress on implementing the Risk Control Action Plan should be monitored to ensure that it is being actioned within the time frames specified.

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- If the hazard cannot be eliminated/controlled at a local level then it is required to be escalated in a timely manner to the appropriate manager for actioning.

4.5.3. Specific requirements for high risk activities/high risks

The WHS Regulation specifies control measures that must be implemented and ISLHD has developed the procedures for the following identified high risks/high risk activities:

- Asbestos - [ISLHD CORP PROC 36 - WHS Asbestos Management](#)
- Hazardous chemicals - [ISLHD CORP PROC 52 – WHS Dangerous Goods and Hazardous Substances](#)
- Noise - [ISLHD CORP PROC 46 - WHS Noise Management](#)
- Plant and Equipment - [ISLHD CORP PROC 90 - WHS Plant and Equipment](#)
- Hazardous manual tasks - [ISLHD CORP PROC 47 - WHS Manual Task Risk Management.](#)

4.6. Monitoring and reviewing risks and controls

- Management, in consultation with their workers, are responsible for evaluating the risk assessment and any measures adopted to eliminate the hazard or minimise the risk arising from the hazard.
- Reviewing needs to be completed:
 - When the control measure is not effective in controlling the risk.
 - Before a change at the workplace that is likely to give rise to a new or different risk that the control measures may not effectively control.
 - If a new hazard is identified.
 - If the results of consultation indicate that a review is necessary.
 - If a Health and Safety Representative requests a review.
 - If a staff injury occurs as part of the incident investigation process.
- The review may also include review of the following documents and information:
 - Incident reports
 - Incident investigation reports
 - Injury statistics
 - WHS inspection reports
 - WHS audits.
- Management, in consultation with their workers, shall evaluate the effectiveness of the risk management program on an annual basis by conducting a formal review of WHS Hazard Register
- It is assumed that the processes of review will utilise the same methods as in the initial hazard identification step to check controls. Consultation with workers and their health and safety representatives will occur and will consider the following:
 - Are control measures working in both their design and operation?
 - Have control measures introduced new problems?
 - Have all hazards been identified?
 - Have new work methods, equipment or chemicals made the job safer?
 - Are safety procedures being followed?
 - Has instructions and training provided to workers been successful?
 - Are workers involved in identifying hazards and possible control

- measures?
- Are workers raising health and safety issues and reporting problems promptly?
- Is the frequency and severity of incidents reducing over time?
- If new legislation or information has been made available, does it indicate current controls may not be the most effective?
- If problems are found, go back through the risk management steps, review the information and make a further decision on risk control. Prioritisation should be based on the seriousness of the risk

4.7. Keeping Records

- Keeping records of the risk management process demonstrates compliance with the WHS Act and Regulations. It also helps when undertaking subsequent risk assessments.
- Keeping records of the risk management process has the following benefits:
 - Demonstrates how decisions about controlling risks were made.
 - Assists in targeting training,
 - Provides a basis for preparing and updating safe work procedures.
 - Makes it possible to easily review risks, following changes to legislation or business activities.
 - Demonstrates to others that health and safety risks are being managed.

4.8. Safe Work Procedures

- ISLHD recognises that it has a legal responsibility to ensure that Safe Work Procedures (SWPs) are developed for complex and/or high-risk tasks, which enable workers to carry out their job accurately, efficiently and safely. SWPs should integrate safety, quality, and clinical and other requirements into the one procedure.
- SWPs should be used to:
 - Minimise the risk of injury/illness.
 - Provide individuals with training in safe, efficient procedures.
 - Instruct new employees on their job as part of orientation/induction.
 - Ensure procedures comply with WHS legislation, standards and facility policies.
 - Maximise the ability of staff to carry out tasks accurately, efficiently and safely.
 - Improve work methods.
- A risk assessment of the task/machinery/equipment/chemical/process must be completed before developing SWPs. This ensures that all hazards and associated risk are identified and suitably controlled.
- SWPs are developed in accordance with the requirements defined in [Info Sheet – Development of Safe Work Procedures \(SWP\)](#)

5. DOCUMENTATION

- [ISLHD CORP F 238 - WHS Hazard Register](#)
- [ISLHD CORP F 45 - WHS Risk Assessment Form](#)

6. AUDIT

Compliance with this procedure will be audited through Ministry of Health WHS Audit Tool every two years in line with the audit cycle.

7. REFERENCES

- [PD2018_013 Work Health and Safety: Better Practice Procedures](#)
- [Work Health and Safety Act 2011, Compilation 11](#)
- [Work Health and Safety Regulation 2017](#)
- [Code of Practice – How to Manage Work Health and Safety Risks](#)

8. REVISION & APPROVAL HISTORY

Date	Revision No.	Author and Approval / Date
October 2012	0	Wendy McCaig
		Approval / Date:
May 2013	1	Jared Lucas, A/Manager WSIMS – updated to align with the MoH WHS Better Practice Procedures
		Approval / Date: Approved for publishing Caroline Vaughan-Reid – Manager Corporate and Executive Support Services
September 2015	2	Jared Lucas – Safety and Well-being Manager SMS review and development.
		Approval / Date: Approved by Executive Management Committee April 2015
March 2019	3	Joanne Caruana – Safety Coordinator Updated Hyperlinks – removed forms
		Approval / Date:
December 2021	4	Author: A/Safety Coordinator Removed obsolete references; updated hyperlinks.
		Approval / Date: Director, Corporate Governance & Risk Management / December 2021