

Individual/Organisational name: Australian Institute of Building

**Revised Model Work Health and Safety Code of Practice: *Construction Work*
Public Comment Response Form**

Model Code of Practice – Construction Work including Housing

Chapter 1: Introduction
Comments: (Please include section/page numbers). AIB does not have any comments on Chapter 1.
Chapter 2: Specific Duties relating to Construction Work
Comments: (Please include section/page numbers). AIB agrees that a Safe Work Method Statement should be prepared, implemented and reviewed for all high-risk construction work (pages 17-18).
Chapter 3: Managing Risks with Construction Work
Comments: (Please include section/page numbers). AIB agrees that any potential risks should be identified, assessed, controlled, and eliminated or minimised where possible.
Chapter 4: Safe Work Method Statements
Comments: (Please include section/page numbers). AIB agrees that a Safe Work Method Statement should be prepared, implemented and reviewed for all high-risk construction work (pages 24-29).
Chapter 5: WHS Management Plans for Construction Projects
Comments: (Please include section/page numbers). AIB agrees that all construction projects (i.e. construction work costing \$250,000 or more) must have a written WHS management plan prepared by the principal contractor before work on the construction project commences, that workers should be informed of this plan, and that it should be reviewed and revised (pages 30-31).
Chapter 6: Information, Training, Instruction and Supervision
Comments: (Please include section/page numbers). AIB agrees with regulations 39 and 316-7 regarding information, training and instruction (pages 32-4), and the comments on page 34 regarding supervision.
Chapter 7: General Workplace Management Arrangements
Comments: (Please include section/page numbers). AIB agrees with the general workplace management arrangements outlined in Chapter 7.
Appendix A: Examples of Construction Work and High Risk Construction Work
Comments: (Please include section/page numbers). AIB has noted the examples and has no comments.
Appendix B: Safe Work Method Statement Template
Comments: (Please include section/page numbers). AIB has noted the Safe Work Method Statement Template, and has no comments.

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Appendix C: Safe Work Method Statement Example
<p>Comments: (Please include section/page numbers).</p> <p>AIB has noted the Safe Work Method Statement example, and has no comments.</p>
Appendix D: General Construction Workplace Facilities
<p>Comments: (Please include section/page numbers).</p> <p>AIB questions whether the items listed on pages 46 to 48 should be placed in a document on safety, as the items listed on these pages are regarding the convenience and comfort of workers rather than their actual physical safety. While these items seem to make sound business practice, listing these examples in a safety document may distract from the important safety advice.</p>
Appendix E: Preparing a WHS Management Plan
<p>Comments: (Please include section/page numbers).</p> <p>AIB has noted the advice regarding preparing a WHS Management Plan, and has no comments.</p>
Appendix F: WHS Management Plan Template
<p>Comments: (Please include section/page numbers).</p> <p>AIB has noted the WHS Management Plan Template, and has no comments.</p>
Appendix G: Sample Completed WHS Management Plan
<p>Comments: (Please include section/page numbers).</p> <p>AIB has noted the sample completed WHS Management Plan, and has no comments.</p>
Appendix H: Housing Construction Workplace Management Arrangements
<p>Comments: (Please include section/page numbers).</p> <p>As with Appendix D, AIB questions whether the items in 'Adequate and Accessible Facilities – R41' (pages 56 to 58) should be placed in a document on safety, as the items listed on these pages are regarding the convenience and comfort of workers rather than their actual physical safety. While these items seem to make sound business practice, listing these examples in a safety document may distract from the important safety advice.</p>
Appendix I: General Construction Workplace Management Arrangements
<p>Comments: (Please include section/page numbers).</p> <p>The comments for Appendices D and H also apply to section on 'Number of toilets' (page 65).</p>
Appendix J: Design Duties
<p>Comments: (Please include section/page numbers).</p> <p>AIB strongly agrees that designers must accept responsibility for the safety of the construction of their designs, and must provide adequate information and consultation about their designs, AIB also agrees that a written safety report (Designer's Safety Report) must be required for designs of structures that have unusual or atypical features which present hazards and risks during the construction phase (page 73).</p> <p>WHS aspects of design responsibilities need to be reinforced for stakeholders on construction projects, but particularly clients and design professionals. Strong anecdotal evidence collected from AIB members suggests that the bulk of responsibility to identify and control health and safety risks continues to rest</p>

with the builder, and there is a lack of impetus for the client or design professional to adhere to their responsibilities. We suggest a re-balancing of WHS responsibilities through education, and where necessary regulation, among all stakeholders, and particularly clients and design professionals. Safety in design is how oil and gas companies achieve performance, as designs are undertaken with construction ability and maintenance in mind. If something is difficult to build or maintain, then generally it will be inherently unsafe. The responsibility for the design must be taken by the design professionals with full support from the client.

Building Information Modelling (BIM)

BIM is currently revolutionising the construction industry, and consideration should be given as to how WHS and BIM can effectively be integrated to incorporate safety features and information, Safe Work Method Statements and WHS Management Plans.

General Comments

Alignment with AS4801

AIB recommends that the revised draft Code be aligned with AS4801. Most large contracting construction companies have been accredited to Australian Standard AS4801. The reason for this is that AS4801 is the mandatory standard to operate and win major commercial contracts in the mining, oil, gas, and infrastructure construction industries. The building industry uses AS4801 extensively at managing contractor level, but currently not as well in the construction of small buildings (under \$15 million cost of construction) and subcontractor level. Implemented properly AS4801 produces safer people, a safer culture, better financial outcomes and site efficiencies. However, if AS4801 is not implemented properly, it can become an administrative burden with few, if any, outputs.

Education and Training

Since health and safety affects all of those that work, a clearer and more connected health and safety educational process should be implemented by governments during school years, through vocational and higher education into employment. WHS needs to have a greater profile across all levels of Management. Delivery of substantial WHS studies within the Construction Management and Economics degree is of the utmost importance, this should delivered and emphasised by appropriately qualified people. It should be mandatory that those who lead the various university schools, including design professionals, have a good understanding of the safety requirements of construction managers.

Work-Related Disease and Disorder

Given that there is a near ten-fold incidence of disease-related fatalities in the workplace compared with injury-related fatalities, there needs to be greater emphasis on combating these risks to the work force, notwithstanding the limited reliable national data.

Research-Based Evidence

This area needs to be significantly improved as construction organisations are concerned about utilising limited resources in an effective way to reduce risk. More emphasis should be placed on national sharing of practical examples to manage workplace risks, as currently this sharing appears to be limited to regulators in NSW, Victoria and Queensland.

Targeted Assistance for Small Businesses

Targeted help for small businesses would help improve overall performance, given that around 50 per cent of the organisations in Australia are classified as small businesses. The Health and Safety Executive in the United Kingdom has a specific section on their website for small businesses and provide ongoing support for these entities. Assistance for small business in Australia appears to be more limited, fractured and not nationally networked.

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Comments on specific issues
<p>Do the additional examples in the revised draft Code provide sufficient guidance to help the housing construction industry, including small business owners, understand and comply with the WHS regulations for construction work?</p> <p>Yes, AIB believes that the additional examples in the revised draft Code provide sufficient guidance to help the housing construction industry, including small business owners, understand and comply with the WHS regulations for construction work.</p>
<p>Are the terms used in the draft Code clear and appropriate, such as 'housing construction work', 'builder' and 'owner-builder'?</p> <p>Yes, AIB believes that the terms used in the draft Code are clear and appropriate.</p>
<p>Are the templates for a safe work method statement and a work health and safety management plan practical to implement?</p> <p>Yes, AIB believes the templates are practical to implement.</p>
<p>What additional changes, if any, would make the revised draft Code more useful for the housing construction sector?</p> <p>AIB has no comment on this question.</p>