

Business Procedure

Safety Fair and Just Response Document Number – OHS-PROC-23

This document applies to the following sites:

All Sites	<input checked="" type="checkbox"/>				
Rockhampton Office	<input type="checkbox"/>	Brisbane Office	<input type="checkbox"/>	Tarong Site	<input type="checkbox"/>
Barron Gorge Hydro PS	<input type="checkbox"/>	Kareeya Hydro PS	<input type="checkbox"/>	Mica Creek PS	<input type="checkbox"/>
Koombooloomba Hydro PS	<input type="checkbox"/>	Swanbank PS	<input type="checkbox"/>	Mackay Gas Turbine	<input type="checkbox"/>
Wivenhoe Small Hydro PS	<input type="checkbox"/>	Stanwell PS	<input type="checkbox"/>	Meandu Mine	<input type="checkbox"/>

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1.0 Purpose

At Stanwell, everyone is a safety leader and we know that proactive learning from events is fundamental to our improvement. The Stanwell Safety Fair and Just Response provides a transparent framework to guide consistent and appropriate leadership responses to an individual's safety behaviour. Our Fair and Just Response is focused on learning, reinforcing safe behaviours, preventing incident reoccurrence and fostering accountability and responsibility to create safer workplaces. The Safety Fair and Just Response process is initiated when an individual's safety behaviour, from exceptional to unacceptable, is identified as a contributing factor to the safety outcome.

2.0 Scope

Our Safety Fair and Just Response procedure applies to all employees, contractors and visitors at Stanwell. Where this procedure leads to employee recognition or performance management, the applicable Stanwell recognition or performance management processes will be used.

We acknowledge that there are different employment arrangements for contract personnel and visitors. In these cases the Safety Fair and Just Response provides a guide to Stanwell's expectations in terms of the response.

3.0 Actions

3.1 What is a Fair and Just Response to Safety Behaviours?

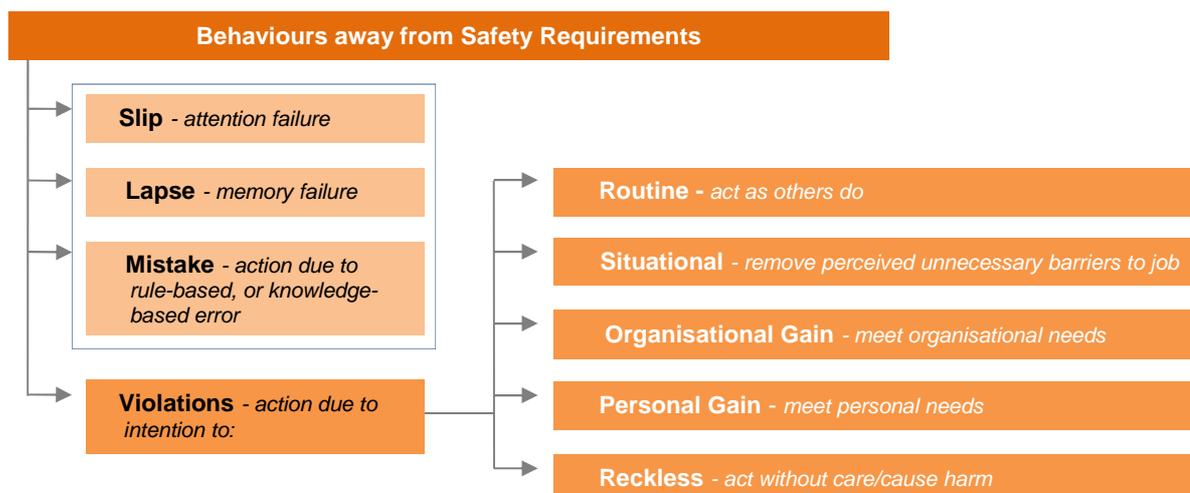
Stanwell supports a Safety Fair and Just Response to safety behaviour that:

- Values our employees and supports the role they play in creating safe workplaces
- Values and supports organisational and individual learning
- Recognises and rewards exemplary safety performance and leadership
- Seeks to understand and consider all contributing and extenuating factors
- Values and supports reporting
- Provides process consistency and transparency
- Draws a line between acceptable and unacceptable safety behaviour and holds individuals to account for inappropriate or unacceptable safety behaviours displayed or condoned
- Is based on an understanding of the science of human factors, including human error and motivation
- Recognises even the most well-intentioned people can undertake unsafe behaviour and develop unsafe behaviour patterns
- Recognises people may make mistakes or experience misunderstandings at work and that task, workplace and organisational weaknesses (e.g. shortfalls in systems, processes, supervision, resources and the environment) can contribute.

Organisational, task and workplace weaknesses are not addressed in this procedure. These are identified and addressed during the incident investigation process with action taken to create safer workplaces for our people. These weaknesses will be taken into consideration to moderate the Safety Fair and Just Response.

Recognition and performance management processes are not detailed in this procedure. The relevant Human Resources procedures apply.

3.2 Understanding Unsafe Behaviour



3.3 Initiating a Safety Fair and Just Response

This procedure will be used after an individual's safety behaviour is identified as a contributing factor to a safety outcome. For example:

- Values Interactions that highlight exceptional or expected behaviour
- H&S Investigations that identify individual safety behaviour contributing to an event.

3.4 Determining a Safety Fair and Just Response

Both motivational (why individual chose that course of action) and situational factors (what made sense to individual/s at the time of the event) must be understood to use the Safety Fair and Just Response procedure effectively. This procedure cannot account for every possible event. It is designed to **guide** leaders toward **consistent, fair and just, improvement-focused responses** that are in accordance with our Values, Safety Principles and Safeguards.

Stanwell values strong safety leadership. Hence, there is a higher expectation and stronger responses outlined for Leaders in the Safety Fair and Just Response Guide.

When things go well, we seek to recognise exemplary safety behaviour and reinforce expected safety behaviour. We strongly believe that our people's positive contributions create safer workplaces, and that recognition and promotion of desired safe behaviours and initiatives encourages further positive contributions.

There can be many contributing factors to unsafe behaviour. **When things go wrong**, our emphasis is on learning and re-positioning our people and the organisation; creating safer workplaces and ensuring barriers exist to protect our people from human-error-induced failures; removing barriers to doing the right thing and removing perceived incentives for safety violations.

We also strongly believe that reckless behaviour and unsafe behaviour for personal gain cannot go unchecked. Individuals will be held to account and appropriate action will be taken. Violations of our safety systems erode the systems integrity. Violations are serious and will be treated as such. The relevant General Manager will be advised immediately of intentional violations. Human resources will be engaged to guide any performance management processes.

3.4.2 Peer and Panel Reviews

To ensure effective and consistent application of the Safety Fair and Just Response procedure, all responses must be agreed to by a relevant and appropriately sized panel or peer review.

For straightforward cases, after the leader accountable for the response has heard from the event Investigator and determined the response, this may be as simple as a second leader conducting a peer review of the planned response. The second leader's role is to ensure that appropriate recognition and learning will be created by the response. It may even be appropriate to determine the response in consultation with the work team in some cases.

In more complex cases, the leader accountable for the response may assemble a review panel. The panel may include technical advisors (i.e. relevant trades, engineers, professionals, etc.), Site or General Manager, line leaders, peers, Health and Safety professionals and the event Investigator, in consultation with a Human Resources partner.

In addition, the **Production Leadership Safety Committee (PLSC)** will review all instances where the Safety Fair and Just Response procedure is used for level 3 events, as determined by Stanwell's Risk Evaluation Matrix, or for events which include a significant learning opportunity relevant to other sites.

The PLSC's role is to:

- Ensure a consistent, transparent approach is taken across the organisation
- Share and apply the learnings relevant to our people at other sites.

3.4.3 Meeting with the Individual

Once all the facts have been gathered, the line leader is to have a learning-focused Safety Fair and Just conversation with the individual as immediately as possible. It may be necessary for the leader to have follow-up conversations with the individual/s following a further peer or panel review.

For this meeting, leaders are to refer to the Safety Fair and Just Response Guide to:

1. Engage the individual in identifying their behaviour type by understanding why the individual undertook the behaviour. i.e. **what made sense to the person at the time of the event**.
2. Involve the individual in identifying **future solutions** that:
 - Create a safer workplace
 - Encourage a reoccurrence of exceptional and expected behaviours / prevent a reoccurrence of error and violations
 - Share the learning with the workplace and organisation.

This same learning process is then followed for the individual's line leader.

Maintaining a supportive relationship with individuals and teams throughout the Safety Fair and Just Response process is vital to the psychological health and wellbeing of all concerned.

3.5 Sharing the Learnings

Sharing learnings with the broader organisation, workplace or work team is warranted and beneficial where the learning may be applied to other situations. The last row in the Safety Fair and Just Response Guide describes organisational learnings and Safety Leadership practices that may be helpful in shaping the response to the organisation/site/team.

Individual outcomes from any performance management processes are to remain confidential between Stanwell and the individual. What will be shared are the learnings and improvements that may benefit others, increase workplace safety and advance our safety culture.

3.6 Documentation

Safety Fair and Just Responses can be documented on the Safety Fair and Just Response Record template and saved in secure TRIM file SAF1355. Where responses related to an event, records can be linked to the relevant event in EARS at the Event Sign Off stage.

4.0 Responsibilities

4.1 Leaders and Health and Safety Personnel Obligations

- Provide a timely and effective Fair and Just Response to safety behaviour
- Immediately advise your General Manager of intentional violations and escalate recognition for exemplary behaviour/initiatives
- Facilitate individual and organisational learning to improve safety
- Share learnings
- Lead health and safety behaviours by example
- Set high health and safety standards and assist others to meet them
- Report events, including when you make a mistake or intervene to halt or prevent at risk behaviour.

4.2 Event Investigator Obligations

- Ensure the completion of a quality investigation that includes the motivational and situational factors necessary to identify the 'behaviour type' and most beneficial response in the Safety Fair and Just Response Guide
- Communicate all behavioural, motivational and situational factors, and any extenuating circumstances, to the leader accountable for the Safety Fair and Just Response
- Participate in Panel Reviews.

4.3 Human Resources Personnel Obligations

- Provide relevant policy/procedural advice and support, and guide recognition or performance management processes.

4.4 All Employees, Contractors and Visitor Obligations

- Lead by example in modelling high health and safety standards and behaviours in accordance with our Safety Principles and procedures – We do not compromise our safety standards, if it's not safe stop the work and find a safer way
- Report events, including when you make a mistake or intervene to halt or prevent at risk behaviour
- Participate in the Safety Fair and Just Response process with a view to learning and improving individual and organisational health and safety.

5.0 Review and Consultation (Prior to Approval)

This procedure was developed through employee consultation. Following an initial 12 month review, this procedure will be reviewed by H&S every 3 years, as a minimum.

6.0 Communication Plan (After Approval)

The content and intent of this procedure was communicated initially via an extensive implementation and communication program and then via induction processes. Revisions resulting in material changes to this procedure or its usage will be communicated via the Health and Safety Committee structure.

8.0 References (Including Information Services)

Health and Safety Policy OHS-POL-01
 Stanwell Safeguards Procedure OHS-PROC-22
 Safety Fair and Just Response Record Template – T-2773
 Safety Fair and Just Responses secure TRIM container - SAF1355
 Fair Treatment Procedure PEO-POL-21
 Code of Conduct – The Way We Work at Stanwell GOV-POL-30
 Legal and Regulatory Compliance Policy GOV-POL-20
 Protected Disclosure Procedure GOV-POL-36
 Whistle-blower Protection Policy GOV-POL-29

9.0 Definitions

Exceptional	Actions above and beyond expected safe behaviours that enhance health and safety
Expected	Safe behaviour in accordance with our Safety Principles, Safeguards, standards, procedures, instructions or leadership direction
Human Factors	Field of science that seeks to understand and optimise the relationship between people and their environment
Human Error	Instances where a correctly planned safe action fails to achieve the intended outcome due to a person's slip, lapse or mistake
Lapse	Errors made when our memory fails and the correct intention or plan is incorrectly carried out
Mistake	Errors that occur when we carry out a plan as intended, however the plan itself was flawed due to inadequate knowledge or inappropriate application of rules
Organisational Gain	Violation based on a desire for a perceived organisational gain
Personal Gain	Violation based on a desire for a perceived personal gain
Reckless	Violation involving intentional risk-taking without care or concern for consequences.
Routine	Short cuts and other violations that may have gone unnoticed or unaddressed up to this point, such that they have become the norm for a group
Situational	Violation involving perceived difficulty to comply with procedure or perception that the safety requirement was unnecessary or a barrier to completing the task
Slip	Errors made when our attention or focus fails and the correct intention or plan is incorrectly carried out
Violation	Intentional decision not to follow Safeguard, procedure, standard, instruction or supervisory direction

10.0 Revision History

Rev. No.	Rev. Date	Revision Description	Author	Content Check	Approved By
		Original Draft	Trevor Hooper		
	27.11.2012	Pre and Post employee consultation	AJ Glazebrook		
0	18.01.2013	Controlled Document registration	AJ Glazebrook	T. Hooper	W. Collins
1	14.06.2013	Minor grammatical edits in framework	AJ Glazebrook	T. Hooper	W. Collins
2	06.04.2014	Initial 12mth review and employee consultation	AJ Glazebrook	C. Shackleton	T. Hooper
3	20.04.2015	Minor edits to clarify HR role, use current business language	AJ Glazebrook	T. Hooper	I. Gilbar
	21.05.2015	Document References updated to remove reference to HSE-PROC-11 as it has been archived and replaced by GOV-PROC-46. Inclusion of the reference to GOV-PROC-46 is to be done upon the instruction of the document owners to	D.Wilkie		

		ensure alignment to any process changes. No Signatures required			
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Safety Fair and Just Response Process Flowchart

Trigger	Process	Action
Event occurs	Incident investigation	Confirm a quality investigation has been completed and contains all motivational and situational factors required to effectively use the Safety Fair and Just Response Guide. Seek further detail if required.
Exceptional safety behaviour occurs	Review relevant information and findings	Understand how an individual's behaviours contributed to the safety outcome. Understand why the individual undertook the behaviour and what made sense to the individual at the time of the event.
	Refer to Safety Fair and Just Response Guide	Use for individual first and then repeat for their leader. Move from left to right along the behaviour type row of the Guide and answer yes or no to questions to determine the most accurate behavioural type description (and therefore response). Once the most appropriate 'yes' is reached, move down the Guide to determine the most helpful learning response.
Consult your General Manager and Human Resources partner for any performance management.	Peer or panel review Meet with individual	<p>Check your proposed approach with peer/s or panel. Meet with the individual to understand what made sense for them, share your perceptions, discuss outcomes, engage the person in identifying solutions to ensure/prevent a reoccurrence and engage the person in identifying how to share the learning with others. This meeting will usually occur privately with the individual. However team discussions may also be beneficial in some cases (e.g. Routine). Refer to Safety Fair and Just Response Guide during this meeting. For maximum effectiveness this meeting must take place in a timely manner, be improvement and learning focused and target the individual and the organisations best interest.</p> <p>In more complex cases follow-up peer/panel reviews and conversations with the individual may be required. If you are not the individual's line leader, keep the line leader informed.</p> <p>The Safety Fair and Just Response guides leaders in creating an opportunity for the individual to:</p> <ol style="list-style-type: none"> 1. Reflect on what they will do again or differently next time 2. Celebrate what worked well and/or Confirm expectations and challenge/innovate what didn't work well.
	Action and document	Complete Safety Fair and Just Response actions identified. Details of the learning can be recorded on Safety Fair and Just Response Record Template (TRIM 14/24301), saved it in secure TRIM container SAF1355 and, where applicable, linked it to the relevant event in EARS at the Event Sign Off. Personal details relating to the response to the individual are to remain confidential and be stored in secure locations.
	Share learnings	Effectively share learnings and actions relevant to others to improve our approach to health and safety at Stanwell and prevent future harm. Refer to "Organisational Learning" section of the Safety Fair and Just Guide.

Safety Fair and Just Response Guide

What made sense to the person at the time?
What are our learning/improvement opportunities to create a safer workplace?

Behaviour Type	Exceptional	Expected	Slip/Lapse/Mistake	Routine <i>Do others do this?</i>	Situational <i>Was the procedure unnecessary or a barrier?</i>	Organisational Gain <i>What was gained?</i>	Personal Gain <i>What was gained?</i>	Reckless
Team Member	INDIVIDUAL START ↓ Did the person act above and beyond expected safety behaviour to actively improve health and safety?	Did the person display expected safety behaviour?	Did the person stray from a safety system, procedure, instruction or leader's direction as the result of a slip, lapse or mistake?	Did the person knowingly violate a safety procedure, instruction, direction or Safeguard in one of the following ways: in a manner that others in the same situation also commonly do?	thought a safety procedure unnecessary, or a barrier to completing this task?	for a perceived gain in line with organisational values?	for a perceived personal gain?	without care for risk to self or others, or with intent to harm?
Response to Team Member	YES <input type="checkbox"/> ↓ NO <input type="checkbox"/> →	YES <input type="checkbox"/> ↓ NO <input type="checkbox"/> →	YES <input type="checkbox"/> ↓ NO <input type="checkbox"/> →	YES <input type="checkbox"/> ↓ NO <input type="checkbox"/> →	YES <input type="checkbox"/> ↓ NO <input type="checkbox"/> →	YES <input type="checkbox"/> ↓ NO <input type="checkbox"/> →	YES <input type="checkbox"/> ↓ NO <input type="checkbox"/> →	YES <input type="checkbox"/> ↓
Recognise Respond in line with Stanwell's recognition guidelines. Focus conversation on acknowledging/praising the person's efforts, actions, value for creating a safer workplace. Consider history of safe behaviours. (i.e. Seek to praise behaviour pattern of consistently high standard of efforts and actions in safety where this pattern exists)	Encourage Positive reinforcement of safe behaviours to encourage the continuation of desired safety behaviours. Response will most commonly be immediate verbal recognition/praise/thanks from the person's line leader.	Explore/ Coach/ Train Focus response on exploring solutions that may prevent a recurrence. This may include and is not limited to workplace/plant improvement, system/ process/ tools modifications, tactics for addressing habituation, planning safe work, hazard identification and control through energies and reducing interruptions that disturb work flow/focus. Consider any trend of unsafe behaviours.	Coach/ Train Focus response on correcting the routine violation for all who perform the activity in the same manner. Coach the group on knowing correct procedures and speaking up when there are discrepancies and procedures cannot be followed. Engage individuals in finding a safer way to complete the task for them self and others. Consider any trend of unsafe behaviours.	Coach/ Train/ Counsel Focus response on removing knowledge barriers or obstacles or to doing the right thing. Coach on effective task planning/preparation, speaking up when required resources are unavailable and/or procedures cannot be followed. Coach on delaying the job until a safe solution can be found. Consider any trend of unsafe behaviour.	Coach/ Counsel/ Discipline Focus response on eliminating incentive to violate. E.g. Confirm Stanwell's safety values and expectations and clearly amend misconceptions. Counsel on balancing commercial pressures with being safe and responsible. Consider any trend of unsafe behaviour.	Counsel/ Discipline Focus response on eliminating incentive to violate. E.g. Are workplace/ process improvements needed? Emphasise Stanwell's safety value. Explore personal value for safety (i.e. What they stay safe for) Consider any trend of unsafe behaviour.	Discipline Focus response on ensuring the integrity of our safety systems is upheld. Human Resources may consult Legal as appropriate.	
For all intentional violations, consult Human Resources and your General Manager regarding performance management.								
Leader	LEADER START ↓ Did the leader act above and beyond expected exemplary role modelling of safety behaviour or actively enable the exemplary safety performance of others?	Did the leader guide the safe behaviours of others as expected and lead safety by example?	Did the leader either fail to detect an employee error or provide ineffective direction or supervision due to a slip, lapse or mistake?	Did the leader allow non-compliant work practices to exist without correction in a manner that others in the same situation also commonly do?	Did the leader think the procedure unnecessary or a barrier to completing task and while they did not condone it, they failed to address the issues?	Did the leader condone, approve or request a safe work violation for a perceived organisational gain?	Did the leader condone, approve or request a safe work violation for a perceived personal gain?	Did the leader commit, condone or request an unsafe act without care for the risk or with intent to harm?
Response to Leader	YES <input type="checkbox"/> ↓ NO <input type="checkbox"/> →	YES <input type="checkbox"/> ↓ NO <input type="checkbox"/> →	YES <input type="checkbox"/> ↓ NO <input type="checkbox"/> →	YES <input type="checkbox"/> ↓ NO <input type="checkbox"/> →	YES <input type="checkbox"/> ↓ NO <input type="checkbox"/> →	YES <input type="checkbox"/> ↓ NO <input type="checkbox"/> →	YES <input type="checkbox"/> ↓ NO <input type="checkbox"/> →	YES <input type="checkbox"/> ↓
Recognise As per response to Team member. Also praise the use of effective Safety Leadership practices.	Encourage As per response to Team member. Also praise the use of effective Safety Leadership practices.	Explore/ Coach/ Train As per response to Team member. Also train/ coach on effective Safety Leadership practices. Consider any trend of unsafe behaviours.	Coach/ Train/ Counsel As per response to Team member. Also coach on effective supervision, responsibility, accountability and effective Safety Leadership. Consider any trend of unsafe behaviours.	Coach/Counsel /Discipline As per response to Team member. Also coach on planning safe work and ensuring current, workable, best practice procedures. Counsel on Safety Leadership. Consider any trend of unsafe behaviours.	Counsel/ Discipline As per response to Team member. Also counsel on effective Safety Leadership, accountability and responsibility.	Counsel/ Discipline As per response to the Team member. Also counsel on Safety Leadership expectations and personal safety values.	Discipline As per response to Team member.	
For all intentional violations, consult Human Resources and your General Manager regarding performance management.								
Organisational Learning	ORGANISATION Inspire Share story of exceptional safety behaviour/initiative/innovation to inspire others and share learnings/improvements. <i>INSPIRE SAFETY VISION</i>	Encourage Ongoing promotion of Stanwell's Values, Safety Principles, Safeguards, Safety Leadership practices, Hazard Management practices and expected safety behaviours. <i>ENCOURAGE HEARTS</i>	Challenge Educate on cognitive/behavioural safety (e.g. ZIP), energy hazard elimination/management, safety focus tools, care for others (e.g. Values Interactions and Values Shares) and the value of using memory prompts (e.g. SafeStarts, Safe Work System checklists, templates, Stay Safes). Implement targeted safety training programs where trends appear (e.g. YOLO). <i>CHALLENGE FOR CHANGE</i>	Challenge Reinforce Stanwell's Values, Safety Principles, Safeguards, safety tools and safety expectations. Create a Hazard Alert. Promote specific safe practices, safe work planning and hazard management tools. Involve team in eliminating hazards and finding safer way. <i>CHALLENGE FOR CHANGE</i>	Challenge Challenge on removing knowledge barriers and obstacles to doing the right thing. Challenge on eliminating energy hazards and innovating safe solutions to create a safer workplace. <i>CHALLENGE FOR CHANGE</i>	Empower Re-emphasise the Safeguards, Safety Principles and Stanwell's foremost value for safety of people. Reiterate that time and budgetary constraints cannot be met at the detriment of the safety of people or the integrity of our safety systems. <i>EMPOWER OTHERS</i>	Empower Emphasise personal value for safety, what we personally stay safe for and consequences of injury and unsafe work. Reinforce Values, Safety Principles, Safeguards, the trust maintained by safe practices. <i>EMPOWER OTHERS</i>	Confirm Reinforce that acts of reckless behaviour will not be tolerated. Action will be taken to keep our people safe and uphold the integrity of our safety systems. <i>MODEL SAFETY VALUES</i>