

**TITLE:** Contractor Safety Management  
**CATEGORY:** Safety and Risk  
**OWNER:** Business Support Services  
**REFERENCE:** D19/7124

---

## SCOPE

This procedure applies to VenuesWest employees and contractors directly engaged to undertake any services or works within self-managed and co-managed venues.

This procedure is not able to be applied in its entirety to Licensees or Hirers of VenuesWest Facilities and their sub-contractors as VenuesWest does not have any influence in their qualification or selection. However, VenuesWest will apply the remaining principles.

This procedure must be read in conjunction with:

- Procurement of Goods, Services and Works Procedure
- Workplace Health and Safety Policy

## PROCEDURE STATEMENT

This procedure outlines the work, health and safety (WHS) obligations relating to contracted works and establishes minimum requirements and performance expectations when pre-qualifying, engaging and managing contractors. The aim of this procedure is to ensure that risks related to the WHS capability and performance of contractors are suitably identified, managed and controlled, including:

- ensuring safety and health management is a key criterion in the selection of contractors;
- identifying hazards and mitigating risk at the planning stage to ensure safe systems of work;
- ensuring all contracted workers have the required qualifications and licences for the work being undertaken; and
- providing adequate information, instruction, training, and supervision.

## 1. GENERAL REQUIREMENTS

### 1.1 Person conducting business or undertaking (PCBU) Primary Duty of Care

VenuesWest is a PCBU and so are the contractors we engage. Under the *Work Health and Safety Act 2020* (WA) (WHS Act) all PCBUs have a primary duty of care and must consult, cooperate, and coordinate with other PCBUs with whom they share duties to ensure workers and others are not exposed to health and safety risks, so far as is reasonably practicable.

### 1.2 Principal or Principal Contractor

Under the WHS Act, the Principal for construction work is the PCBU that directly commissions / engages the work, in most cases VenuesWest would be the Principal. However, the primary PCBU may appoint a contracted/ third party PCBU as Principal Contractor for work that is (or is likely to be) a Construction Project. A Principal Contractor may be appointed where:

1. The worksite is 'on-hire' to another PCBU for the full duration of the works, or
2. The worksite is to be a 'ring-fenced' construction site with control given to another PCBU, or
3. VenuesWest has limited influence / control over the workplace (for example the Licensee or Hirer may be considered the primary PCBU, and they may appoint a Principal Contractor), and/or
4. The construction work is undertaken by subcontractors of a main contracted PCBU.

Where a Principal Contractor is to be appointed by VenuesWest, the Contractor Host or VenuesWest Representative must ensure the intended PCBU is properly appointed within the governing contract and has the necessary control or management of the workplace to enable them to discharge the duties and positive due diligence of a Principal Contractor. If the Licensee engaged a Principal Contractor, the due diligence falls to them to positively discharge their duties to the engaged Principal Contractor for their Construction Project. A Construction Project may have only one Principal Contractor appointed at a time.

## 2. QUALIFICATION & SELECTION

1. VenuesWest should qualify contractors who demonstrate acceptable safety performance and safe systems of work. Contractor qualification should occur through a qualitative assessment within the procurement processes or through registration in the electronic systems, Rapid Global (works) and Ungerboeck (events/bookings).
2. Electronic records are used to manage and store prequalification/ verification information and data including but not limited to:
  - a. Prequalification questionnaire,
  - b. Contractor's submission of required evidence, inclusive of a documented safety management system or safety plan applicable to the contractor's operations,
  - c. VenuesWest evaluation / verification of contractor's submissions and Rapid Global e-form performance score, and
  - d. Notations to restrict activities / work scopes for which the contractor has declared or is deemed to be unsuitable.
3. The VenuesWest work team that initiates new contractor prequalification shall provide a representative to assist with the contractor setup in the appropriate electronic record system (e.g. Rapid Global) and to ensure VenuesWest requirements outside of Rapid Global are met, such as contractual, procurement and new-vendor invoicing and payment setup.
4. Regular contractors shall only be selected from the VenuesWest list of verified and compliant contractors in Rapid Global, on the state government Common Use Arrangements list (CUA) or Approval Panel. The Contractor Host is to ensure the selected contractor is suitable for the proposed scope of work, for example have the correct licences, insurance and trained personnel.

## 3. ENGAGEMENT

1. Contractors shall not be permitted to commence work on site or within a venue until they have been properly engaged via an approved contract for work, including:
  - a. A contract to deliver products/services signed by the Licensee or Contractor and VenuesWest; or
  - b. An approved MEX Work Order; or
  - c. An approved Purchase Order.
2. The Contractor Host should conduct planning meetings with contractors to ensure the contractor is properly on-boarded with information relating to relevant site hazards and mandatory requirements, including but not limited to:
  - a. Site critical hazards map,
  - b. Maps and diagrams of known services,
  - c. VenuesWest critical safety rules,
  - d. Site induction for all workers,
  - e. Worker identification and sign-in requirements, and
  - f. Completion of applicable contractor management system requirements, where required (Rapid Global).

### 3.1 Safety Documentation

1. The Contractor Host, supported by the site Safety and Risk (S&R) Coordinator, is responsible for notifying the contractor of the safety documentation required for the work and liaising to ensure this is uploaded into Rapid Global by the contractor, including as applicable:
  - a. Documents that demonstrate safe systems of work (Safety Management Plan or System Certification),
  - b. Site specific Safe Work Method Statement (SWMS) for any high-risk construction work, or Job Risk Assessment for non-high-risk construction work (for convenience, a SWMS can be submitted that addresses both work types),
  - c. Emergency / rescue plan,
  - d. Event management plans,
  - e. Any specific permits (e.g. building or special effects),
  - f. Applicable licences (contractor and worker),
  - g. Permit to Work.

### 3.2 Verification of Contractor Documents in Rapid Global

1. Verification of contractor documents shall occur within the Rapid Global system to confirm the works contractor has supplied the requested information for the applicable scopes of work. Verification will be conducted by the Contractor Host, supported by the site S&R Coordinator to confirm:
  - a. The requested documents have been provided,
  - b. Valid insurance certificates,
  - c. Mandatory worker licences and/or competency certificates,
  - d. High risk construction SWMS conform to the standard set by Worksafe WA, and is signed and dated by the Contractor,
  - e. Risk assessments are site specific and applicable to the scopes of work, and include:
  - f. Identification of hazards with the potential to cause harm,
  - g. The control measures that will reduce the risk of injury So Far As Is Reasonably Practical (SFAIRP) and
  - h. Residual risk ratings
2. Verification is not an approval process and VenuesWest shall not amend or direct trades/ PCBU practices or any other specialised contractor in the performance of their work. Verification comments and feedback to the contractor should be for the purpose of confirming safety requirements are met and are specific to the site and scope of work.

## 4. MOBILISATION

### 4.1 Induction and Sign-in

1. It is mandatory for all contracted workers to complete a safety induction prior to starting work at a VenuesWest site. The Contractor Host is to liaise with the contractor to ensure the safety induction is processed and completed by all contracted workers on site. This may be via Rapid Global or the primary PCBU's chosen system. The contractor representative is responsible for distributing the induction to on-site workers and ensuring completion prior to work starting.
2. Before commencing work on-site, workers are required to sign-in to the site they are working at:
  - a. using the Rapid Global mobile phone application (Rapid Access) or on-site Rapid Global Kiosk, or
  - b. using an alternative sign-in process that has been approved by the Venue Manager applicable for large groups of contracted workers, such as sign in sheets and wrist bands for events contractors.
3. When signing-in via Rapid Global it is the individual worker's responsibility to perform the sign-in correctly, including:
  - a. selecting the applicable Contractor Host for the work,
  - b. displaying the kiosk printed identification sticker on their person in a prominent location, or
  - c. retaining the mobile phone application identification photo and producing this on request by VenuesWest.
4. VenuesWest may refuse / revoke entry permission where a worker has failed to comply with the sign-in requirements.

### 4.2 Competencies / Licences

1. Contractors working at a VenuesWest venue are required to upload photo identification such as a passport or driver's licence into Rapid Global. This is for identification purposes only and the validity of these is not monitored.
2. Individuals must also upload copies of licences required for work they are doing on site, including where applicable:
  - a. Construction Industry White Card (for any work that is construction in nature)
  - b. High Risk Work Licence (with the specific qualifications stated)
  - c. Working at Heights
  - d. Confined Space
  - e. Electrical Licence
  - f. Plumbing and Gas Fitting Licence

### 4.3 Safety Meetings

1. The Contractor Host is responsible for ensuring a pre-start/safety meeting is held for all workers involved in the scope of work, including on the first day prior to the commencement of site construction works, for the purpose of, but not limited to:
  - a. Checking workers are signed-in to site,
  - b. Reviewing task risk assessments and update to include additional identified hazards, and workers on the job in high-risk construction work have signed-onto the applicable SWMS; and
  - c. Consulting with workers to identify and address WHS related questions/issues.
2. The Contractor Host should attend and document prestart safety meetings, where possible.

## 5. MONITORING

1. VenuesWest shall monitor and document the performance of each PCBU involved and if any requirements are not being fully met, shall provide feedback to the PCBU with an expectation to take action to comply.
2. For any events, some key opportunities for consultation, cooperation and coordination include:
  - a. contract discussions;
  - b. planning or approval process;
  - c. operational planning and scheduling;
  - d. induction and orientation;
  - e. production meetings;
  - f. supplier and contractor briefings;
  - g. risk assessments (for whole project/event or for activities);
  - h. safety plans; and
  - i. debrief, review and assessment.
3. The Contractor Hosts, supported by the site S&R Coordinator, are to conduct monitoring and auditing of contractor safety compliance, including:
  - a. Unannounced spot checks and observations,
  - b. Notified safety compliance audits,
  - c. Trigger/ Progress reports, and/ or
  - d. Targeted compliance checks in response to a safety incident or complaint.

### 5.1 Safety Compliance Audits

1. VenuesWest will conduct audits of selected contractor scopes to evaluate the contractor's compliance with safety requirements, including but not limited to:
  - a. Workers are signed-in to/on site,
  - b. A contractor approved SWMS is in place for high-risk construction work and is easily available for all workers on the job, and workers must have a copy available onsite for all high-risk construction activities.
  - c. The SWMS is updated with applicable changes in work conditions,
  - d. Works are being conducted in accordance with supplied documentation including, the task SWMS / job risk assessment,
  - e. Permit to Work requirements are in place where required,
  - f. Workers hold the required competencies for high-risk work where required, and
  - g. Sufficient controls are in place to prevent harm to patrons and members of the public.

*Further details can be found in the Contractor Safety Performance Audit program manual*

### 5.2 Contractor Non-Conformance

1. The contractor engaged is to be informed verbally, then in writing by the Contractor's host line manager, of all safety concerns relating to any works and assigned responsibility for related hazard / incident reports, such as when the contractor is:
  - a. not conducting the work in compliance with safety and health legislation, submitted safety and health management plans or SWMS; and/or
  - b. conducting the work in such a way as to endanger the safety of workers or VenuesWest employees and patrons.

### 5.3 Suspension of Contractor

1. General Managers and/or the Chief Safety and Risk Officer are responsible for the decision to suspend or permanently remove a contractor from the qualified contractors list in Rapid Global. If it is decided that a contractor is to be suspended from undertaking further work for VenuesWest, the contractor will be notified and provided with the reasons.
2. The CSRO in conjunction with the S&R Coordinator is to ensure the evidence and basis for the suspension are recorded in Rapid Global.
3. The S&R Coordinator is to coordinate with the contractor host for the contractor engaged to deliver on an agreed improvement plan for the purpose of reinstating the contractor in Rapid Global.

## 6. REVIEWS

1. The Contractor Host shall lead the contractor review program and coordinate input and assistance from the S&R Team. The purpose of the review is to repeat the initial qualification process with additional consideration of the contractor's WHS performance over the period to determine if, on aggregate, the contractor's WHS standing, and performance is acceptable. The following matters / observations should be considered:
  - a. Current status of mandatory documents (i.e. Safety management plan, insurance certificates, etc),
  - b. Past performance comments entered against the contractor,
  - c. Feedback (documented or verbal) from past VenuesWest users of the contractor,
  - d. Results of WHS compliance audits,
  - e. Incident reports and corrective actions; and
  - f. Matters relating to the management contract.
2. Where evidence of significant safety concern(s) is identified, the S&R Team is required to clarify these matters with the contractor, seek immediate rectification, document in Rapid Global and advise the Contractor Host of potential suspension of the contractor.
3. The Contractor Host will need to inform the contractor in writing of the decisions to suspend.

## DEFINITIONS

TERM	MEANING
So Far As Is Reasonably Practicable (SFAIRP)	In relation to implementing a risk control, SFAIRP is the point at which the time, cost and effort of further control would be grossly disproportionate to the perceived benefit.
Construction Project	A project that involves construction work where five or more persons are, or are likely to be, working at the same time at a construction site.
Construction Work	Any work carried out in connection with the construction, alteration, conversion, fitting-out, commissioning, renovation, repair, maintenance, refurbishment, demolition, decommissioning or dismantling of a structure. See WHS Regulation 289.
Contractor	A contractor who performs construction work as defined in the WHS Regulations at a VenuesWest self-managed or co-managed site.
Contractor Representative	The worker nominated by the contractor as having supervision of its workers for the site works and/or who is identified in the relevant contract.
Contractor Host	The VenuesWest Principal Representative member who is the main point of contact for the contractor during onsite works/services/ life of the contract. The Contractor Host represents VenuesWest as the Principal for the work.
Contracted Workers	Those workers undertaking construction work either directly engaged by VenuesWest or engaged under a sub-contract relationship with a VenuesWest contractor
Electronic Record System or Contractor Management System	Construction or Maintenance Works – Rapid Global Events – Ungerboeck Other – SharePoint or Content Manager
High Risk Construction Work	As defined in the WHS Regulations 291 (see Appendix A).
Principal	VenuesWest shall be the Principal PCBU in relation to WHS obligations and due-diligence where it is party to a contract with another PCBU to undertake construction work at a VenuesWest site, except where a Principal Contractor is appointed.
Principal Contractor	The contracted PBCU that is appointed under a contract to perform WHS obligations and due-diligence of a Principal Contractor in relation to a construction project.
PCBU	Person conducting business or undertaking
Safe Work Method Statement (SWMS)	A risk assessment identifying the work that is high risk, hazards relating to the high risk and control measures a person will adhere to. <b>WA WHS Regulations 291 mandates that a Safe Work Method Statement (SWMS) be prepared and made available to workers involved in high-risk construction work.</b>
Site-Specific WHS Documentation	The required document is prepared taking into account circumstances at the workplace that may affect the way in which the work is carried out.
VenuesWest Principal Representative	The VenuesWest employee who commissions the contracted work and is the VenuesWest representative for the contract. See Contractor Host.
Worksite / Construction site	A workplace where construction work is being, or is intended to be, performed.

## ROLES AND RESPONSIBILITIES

ACTIVITY	CONTRACT HOST	SAFETY AND RISK	EMPLOYEES
<b>QUALIFICATION AND SELECTION OF CONTRACTORS</b>	<ul style="list-style-type: none"> <li>• Determine if a Principal Contractor is to be appointed for the control and management of WHS requirements.</li> <li>• Where applicable and in consultation with the selected PCBU and Contractor Host, ensure the appointment of a Principal Contractor is properly established via the governing contract.</li> <li>• Where applicable, assist with the setup of a new contractor in VenuesWest including Rapid Global, contracts, and finance requirements for new-vendors.</li> </ul>	<ul style="list-style-type: none"> <li>• Assist with determining if a Principal Contractor is to be appointed for the control and management of WHS requirements.</li> <li>• Participate in the evaluation of contract tenders.</li> <li>• Undertake prequalification of contractors in Rapid Global.</li> <li>• Undertake requalification reviews of contractors in Rapid Global.</li> </ul>	
<b>ENGAGEMENT AND MOBILISATION</b>	<ul style="list-style-type: none"> <li>• Ensure the contractor is properly onboarded with information relating to site hazards and mandatory requirements.</li> <li>• Verify the contractor has provided site-specific documentation required for the work in Rapid Global.</li> </ul>	<ul style="list-style-type: none"> <li>• Support Contractor Host with issues experienced in Rapid Global.</li> <li>• Assist with reviewing management plans.</li> </ul>	
<b>MONITORING</b>	<ul style="list-style-type: none"> <li>• Ensure VenuesWest's and regulatory requirements are met throughout the duration of the works or event.</li> <li>• Confirm that workers are signing into site using agreed method.</li> <li>• Attend safety meetings with contractors, where possible.</li> <li>• Review the work and report safety concerns to the Contractor for rectification.</li> <li>• Stop any work that is, or is likely to be, performed in an unsafe manner.</li> </ul>	<ul style="list-style-type: none"> <li>• Undertake compliance audits, inspections, and monitoring of contractor works.</li> <li>• Investigate incidents involving contractors in accordance with VenuesWest's requirements.</li> <li>• Liaise with Contractor Hosts regarding safety and health requirements</li> </ul>	<ul style="list-style-type: none"> <li>• Stop any work that is, or is likely to be, performed in an unsafe manner.</li> <li>• Report any hazards and/or incidents involving contractors to the Contractor and Contractor Host.</li> </ul>
<b>REVIEW</b>	<ul style="list-style-type: none"> <li>• Conduct review or trigger meeting with contractors</li> <li>• Conduct evaluation on contractor performance, for use when selecting future contractors for work at VenuesWest</li> </ul>	<ul style="list-style-type: none"> <li>• Perform routine/ ad hoc performance audits reviews of contractor safety performance.</li> <li>• Record information relating to suspension of non-compliant contractors in Rapid Global</li> </ul>	
<b>ADMIN AND SUPPORT</b>		<ul style="list-style-type: none"> <li>• Administrative support using Rapid Global</li> <li>• Provide training, support, and advice to ensure Contractor Hosts are aware of their roles</li> </ul>	

## RELATED RESOURCES

SUPPORTING PROCEDURES	SUPPORTING DOCUMENTS	RELATED LEGISLATION OR STANDARD
Procurement of Good, Services or Works Procedure Permit to Work Procedure	Contractor Safety Management Checklist Licensee & Hirer Safety Management Checklist Checklist – SWMS Review Checklist – Works Planning Checklist – Events Planning Rapid Global Admin User Guides	<i>Work Health and Safety Act 2020 (WA)</i> <i>Work Health and Safety (General) Regulations 2022 (WA)</i>

## GOVERNANCE

RESPONSIBLE OFFICER APPROVAL	Di Mistic – Director Business Support Services – August 2023
ENDORSEMENT	Policy Governance Committee – 29 August 2023
APPROVAL	Executive – 4 October 2023
EFFECTIVE DATE	4 October 2023
REVIEW DATE	October 2026
VERSION	2.0

## APPENDIX A: HIGH RISK CONSTRUCTION WORK

WHS Regulation 291 defines the following as High-Risk Construction work:

1. involves a risk of a person falling more than two metres; or
2. is carried out on a telecommunication tower; or
3. involves demolition of an element of a structure that is load bearing or otherwise related to the physical integrity of the structure;  
or
4. involves, or is likely to involve, the disturbance of asbestos; or
5. involves structural alterations or repairs that require temporary support to prevent collapse; or
6. is carried out in or near a confined space; or
7. is carried out in or near:
  - a) a shaft or trench with an excavated depth greater than 1.5 metres; or
  - b) a tunnel; or
8. involves the use of explosives; or
9. is carried out on or near pressurised gas distribution mains or piping; or
10. is carried out on or near chemical, fuel or refrigerant lines; or
11. is carried out on or near energised electrical installations or services; or
12. is carried out in an area that may have a contaminated or flammable atmosphere; or
13. involves tilt-up or precast concrete; or
14. is carried out on, in or adjacent to a road, railway, shipping lane or other traffic corridor that is in use by traffic other than pedestrians; or
15. is carried out in an area at a workplace in which there is any movement of powered mobile plant; or
16. is carried out in an area in which there are artificial extremes of temperature; or
17. is carried out in or near water or other liquid that involves a risk of drowning; or
18. involves diving work.

Worksafe WA mandates that a Safe Work Method Statement (SWMS) be prepared and made available to workers involved in high-risk construction work.