



Procedure

CHAIN OF RESPONSIBILITY PROCEDURE

PRS-09

Relevant to:

All PMG Employee's & all persons involved in consigning, packing, loading, driving, operating and receiving goods.

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HSEQ Manager

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CONTENTS

1	WHAT IS CHAIN OF RESPONSIBILITY?	3
2	HEAVY VEHICLE NATIONAL LAW (HVNL)	3
3	SCOPE	3
4	DUTIES AND RESPONSIBILITIES	4
4.1	General.....	4
4.2	Manager's Responsibility	4
5	CHAIN OF RESPONSIBILITY	4
5.1	Mass & Dimension	4
5.2	Load Restraint	5
5.3	Driver Fatigue	5
5.4	Speed	5
6	CONTRACTS	5
7	VEHICLES	5
8	DRIVERS.....	6
9	FATIGUE MANAGEMENT	6
10	SCHEDULING	7
11	MASS LIMITS	7
12	SPEED MANAGEMENT	7
13	LOAD RESTRAINT	8
14	BREACHING THE PROCEDURE	8
15	RAISING CONCERNS.....	8
16	REFERENCE.....	9

1 WHAT IS CHAIN OF RESPONSIBILITY?

Chain of Responsibility (COR) is a nationally legislated program of compliance and enforcement that aims to improve safety and reduce accidents across the road transport industry.

The "Chain of Responsibility" extends legal liability for certain road law offences to all parties who by their actions, inactions or demands exercise control or influence over the entire transport chain. All persons involved in consigning, packing, loading, driving, operating and receiving are covered by this legislation.

PMG will not knowingly ask or expect any employee or contractor to do anything that is unlawful or that will create a dangerous or potentially dangerous situation.

2 HEAVY VEHICLE NATIONAL LAW (HVNL)

The HVNL came into effect in 2014 it was established to provide nationally consistent laws. The Chain of Responsibility laws apply across all areas in the supply chain where investigations and enforcement into COR breaches occur.

The aim is to positively influence the actions of those involved in the heavy vehicle transport industry and ensure all parties who influence on-road behaviour are held accountable for breaches of road transport laws

The purpose of this procedure is to provide guidance to PMG staff on COR.

3 SCOPE

This procedure is designed to form part of PMG's compliance strategy. It applies to all employees, contractors and visitors within PMG that have responsibility for or involvement in activities that fall within the scope of the road transport laws.

This may include (but not be limited to) roles within logistics, supply chain and support roles. This includes, full time, part time and casual employees as well as contractors or subcontractors working for or on the behalf of PMG. It also extends to suppliers and visitors where appropriate.

This procedure applies to all PMG workplaces and other workplaces or situations where employees, contractors or subcontractors may be working or representing PMG. If you are uncertain if this procedure applies to you, please speak with your Area Manager, HSEQ Manager, or contractor site liaison.

4 DUTIES AND RESPONSIBILITIES

4.1 General

All employees and contractors should consider their actions and ask for guidance. If you are ever in doubt about a course of action, ask yourself the following:

- Is it consistent with the policy and procedure?
- Is it safe?
- Is it appropriate and legal?

If your answer is “No” to any of these questions, don’t do it.

If you are still uncertain, ask for guidance. The procedure attempts to capture many of the situations that employees and contractors may encounter, but it cannot address every circumstance. In the first instance, always check with your manager. If in doubt seek further guidance.

4.2 Manager’s Responsibility

Ensure that the people you supervise understand their responsibilities under the Chain of Responsibility procedure

- Take opportunities to discuss the procedure and reinforce the importance of safety and compliance
- Create an environment where employees and contractors feel comfortable raising concerns
- At no time encourage or direct employees or contractors to achieve business results at the expense of ethical conduct or compliance with any policy, procedure or law
- Document all relevant process, audit and training information appropriately.

5 CHAIN OF RESPONSIBILITY

Chain of Responsibility is relevant for all areas of PMG, particularly in the areas that deal with logistics such as Equipment Services, At Work and Supply Chain.

The four (4) main elements of the Chain of Responsibility are:

5.1 Mass & Dimension

Ensuring that trucks leave our sites within the mass carrying constraints and that the mass is distributed across the truck axles. Also ensuring dimension limits are adhered to.

5.2 Load Restraint

Ensuring that when our trucks are loaded that the load is adequately secured to the vehicle.

5.3 Driver Fatigue

Ensuring that drivers are well rested and are given adequate time to take their scheduled rest breaks. Taking into consideration the number of hours worked.

5.4 Speed

Ensure that driver's routes are realistic and safe and that we are not imposing demands that may result in a driver putting themselves or others at risk. Schedules need to consider the distance that needs to be covered, traffic conditions and delays at receiving sites.

6 CONTRACTS

PMG operates ethically always and expects contractors to do the same. Before engaging a Third-Party operator, reasonable enquiries into their policies, processes and practices is required.

Robust operational policies across the Chain of Responsibility spectrum of Speed, Mass, Load Restraint & Driver Fatigue are required to be evidenced. In addition, Health Safety & Environment (HSE) including Drug and Alcohol policies. This should be checked internally in PMG and externally with contractors using the 'PMG Contractor or Customer Checklist' by the person organising the freight/equipment movement.

If a third party doesn't meet PMG's required standards they should not be engaged to perform works for or on behalf of PMG. PMG has a duty of care for all workers, and safety will not be compromised for any reason.

PMG must not enter into a contract or other agreement with the driver of a heavy vehicle, or with a party in the chain of responsibility for a heavy vehicle, that PMG knows, or ought reasonably to know, would encourage or provide an incentive for the vehicle's driver, or a party in the chain of responsibility for the vehicle to cause the vehicle's driver, to exceed a speed limit.

7 VEHICLES

Heavy Vehicle Definition: A vehicle is a heavy vehicle if it has a Gross Vehicle Mass (GVM) of more than 4.5 tonnes.

Regulated Heavy Vehicle Definition: A vehicle is a regulated heavy vehicle if it has a Gross Vehicle Mass (GVM) of more than 12 tonnes.

It is a requirement at PMG that any heavy vehicle consigned to do work for PMG has the following information verified prior to commencement and is maintained for the duration of that work:

- Vehicle Registration
- Appropriate Insurance(s)
- Maintenance up to date
- Fit for purpose
- Appropriate load restraint for task
- Speed Limiter functional - (Regulated Heavy Vehicle)

8 DRIVERS

It is a requirement at PMG that any Driver engaged to do work for PMG has the following information verified prior to commencement and is maintained for the duration of that work:

- Appropriate Heavy Vehicle Driver's License
- Medically Fit to Drive
- Required Insurances
- Fully Inducted
- Trained in COR requirements.

If at any time a driver does not meet the above requirements they are to inform PMG immediately. Failure to comply with this component of the procedure may result in termination of employment.

9 FATIGUE MANAGEMENT

Fatigue can affect a person's health, reduce performance and productivity, and increase the chance of a work place accident or road crash.

PMG and all parties in the supply chain must take reasonable steps to ensure that any risks associated with fatigue are identified, minimised, controlled or eliminated.

Examples include but are not limited to:

- Drivers properly managing their work & rest and not driving if fatigued
- Ensuring trip schedules have sufficient flexibility and are reasonable
- Maintaining effective loading and queuing practices
- Ensuring that commercial arrangements do not incentivise the driver to break the law (e.g. driving excessive hours or speeding to meet deadlines).

10 SCHEDULING

Schedulers must take all reasonable steps to ensure the schedule will not cause the vehicle to breach mass limits or cause the driver to exceed the legal speed limit.

Reasonable steps include but are not limited to;

- Consulting the driver or operator prior to finalising the schedule.
- Taking account of the average speed that can be travelled lawfully on scheduled routes.
- Allowing for traffic conditions or other delays in schedules
- Contingency planning concerning schedules

11 MASS LIMITS

PMG must ensure that any vehicle that is loaded with a PMG product or asset, is loaded in line with the Mass Limits of that vehicle. PMG will provide the driver or nominated representative, with all relevant mass information related to the load prior to loading, and in case of pre-loaded vehicles prior to departure.

The driver or nominated representative has the authority to request adjustments to the load if the driver is concerned with the weight of the load. The gross mass of the load is required to be placed on the vehicle in line with legal axel mass limits.

As all vehicles are different and drivers know their vehicles best the driver is responsible to direct the loader to position the load according to his vehicle axel mass limits. It is also imperative that mass and dimension limits are adhered to throughout the delivery cycle, i.e. as freight is removed or added to the vehicle in the field, etc.

12 SPEED MANAGEMENT

PMG will not pressure, direct or encourage at any time any driver to speed for any reason.

PMG insists on safe work behaviour and speeding will not be tolerated.

PMG and its transport providers will ensure a robust approach to speed management that can incorporate but is not limited to the following controls:

- Regular consultation with drivers
- Reviewing of driving, work & trip records
- A program to report & monitor incidents of speeding, & related risks and hazards
- Training & Information for drivers, staff and parties in the chain of responsibility
- Regular maintenance of vehicle components that relate to complying with speed limits (speed limiters, speedometer, engine management systems).

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- Remuneration model that does not incentivise or penalise drivers for early or late deliveries.

13 LOAD RESTRAINT

The safe loading of heavy vehicles is vitally important in preventing injury to people and damage to property. There are also economic benefits to PMG if the load arrives intact and without damage.

Every load that leaves a PMG site must be restrained in line with the National Transport Commissions Load Restraint Guide 2004.

The load must be restrained to withstand forces of at least:

- 80% of its weight in the forward direction
- 50% of its weight sideways and rearwards
- 20% of its weight vertically

PMG's position on the type of load restraint for each load channel may differ. However, some standards are universally preferred.

- Certified load restraint curtains
- Certified headboards and sides on rigid vehicles
- Plastic angles not metal angles.
- 2500kg rated web strapping never ropes.

If you are unsure of what the correct load restraint required for a vehicle or load type is, see your immediate Manager.

14 BREACHING THE PROCEDURE

The Procedure sets standards of behaviour expected from everyone who performs work for PMG.

Breaches of this procedure may result in disciplinary action up to and including termination of employment.

For contractors, it may lead to the immediate termination of a contract. It is expected that suppliers will enforce a similar set of standards with their employees.

15 RAISING CONCERNS

If you observe behaviour that concerns you, or that may represent a violation of the Procedure, raise the issue promptly with your manager. Doing so will allow PMG an opportunity to deal with the issue promptly.

If you have any questions about the Procedure, its meaning or its application, you should raise these initially with your Manager or alternatively:

- Your relevant Divisional Manager
- PMG's Operations Manager
- PMG's HSEQ Manager

16 REFERENCE

- PMG WHS Policy
- NTC Model Act on Heavy Vehicle Speeding Compliance
- Heavy Vehicle (Mass, Dimension and Loading) National Regulation
- Heavy Vehicle National Law (HVNL).