

Guide lines for risk assessment for plant and machinery operator competence from manufacturers and associations.

Featured are opinions from:

American Concrete Pumping Association
BC Association for Crane Safety
Caterpillar
Concrete Pumps Association UK
Crane Certification Association of America
Crane Institute of America Inc.
Crane & Safety Services Ltd
Favelle Favco Cranes
Federation of Piling Specialists UK
Kone Cranes
Liebherr Crane Manufactureres
Lloyds British
Middletons Lawyers
NT WorkSafe
Pile Drivers USA Local Union 2404
Pile Driving Contractors Association Florida
RailCorp
Safe Work Australia
Safework SA
Victorian Crane Association
WestTrac
WorkCover NSW
Work Safe VIC
PCC Workplace Lawyers



Introduction

We developed The Brown Book to address what we see as a serious problem on Australian construction and mining sites. Due to changes in the work place laws operators are deemed competent to operate high risk machinery after only 4 days training with an RTO. The levels of competency of these graduates may vary widely, from the novice with only the 4 days of training to a well-experienced operator with 1000's of hours of workplace training. The certificates awarded to trainees do not adequately describe the type of machinery operated, the amount of time spent on each task or the exact functions practiced. The certificates do not describe the operator's lifetime of training and work experience. At best, the operator might have a wallet full of cards and certificates but none with full details of the exact details of previous work performed.

The result is that we have under qualified people operating high risk machinery on work sites. And, it's not against the work place laws, because they do have a current certificate or licence issued by an RTO. But, if an accident happens, and it's proven to be due to the lack of experience of the operator, then the work site management and owners can be found liable. Accidents are often tragic causing loss of life and limb, but they can also be very costly.

We believe that the way to solve this problem is to supplement and augment the training received from short courses with careful and detailed log book maintenance throughout the work life of plant and machinery operators. The Brown Book provides the perfect format to record a person's life time of training, experience and verification of competency in a standardized manner, all in one place.

In developing The Brown Book Log Books we have sought the advice and support from leading employers from mining and construction industry, government associations, workplace lawyers, employer associations, safety consultants, training organisations and subcontractors.

Here is a collection of quotes from letters we have received over the years as we researched the need for The Brown Book. What they all highlight is the drastic difference between what level of experience is required to operate plant and machinery and what is required by law and, the onus for ensuring the safe operation of plant and machinery being the responsibility of the employer.

American Concrete Pumping Association

"This is the experience time needed to run the various pumping equipment - 3 Months – Grout & Pea Rock , 6 Months – Line Pump/General, 12 Months – Line Pump/High Pressure, 12 Months – Three-Section Boom Pump, 12 Months – Four-Section Boom Pump, 18 Months – 50-Meter and Larger Boom Pump and 6 Months – Separate Placing Boom.

Sue Schumacher 4 June 2013

BC Association for Crane Safety Canada

"number of hours vary from crane type to crane type..."

Fraser Cocks- Executive Director 23 November 2012

Caterpillar Inc. America

"In regards to your question below about how much seat time is needed for an excavator Operator to be competent and experienced I feel could be broken down into two different categories. As part of the Caterpillar Instructor team we usually have a guideline that if an Operator has had 1- 3 years of operating experience he would be classified as a competent operator, this Operator would have a very basic understanding of Safety, walkaround inspections, operators compartment, start-up/shut-down procedures, basic operating procedures based on industry requirements and basic earthmoving fundamentals so an individual can develop skills to operate equipment safely and proficiently."

Joshua Hayes – Senior Marketing Training Consultant 5 December 2012

Concrete Pumps Association UK

"...would only become competent over a period of time by doing a vocational qualification and that could take up to two years depending on their abilities."

Haydn Steel – Safety and Training Manager 8 June 2013

Crane Certification Association of America

"I would say if an operator has 4000 hours of actual seat time, he/she should be fairly proficient at operating the type of crane they have experience in."

Ray Feidt – President 20 November 2012

Crane Institute of America

“Minimum operator certification is established by passing certification exams. Recertification requires 1,000 hours operation over a period of 3 years plus passing an exam. We at the Crane Institute have a 3 year requirement plus passing written exams to issue a CIA qualification.”

James Headley – Director 20 November 2012

Crane and Safety Services Ltd Ireland and Scotland

“We do training in Asia and Africa where we advise clients to have their trained operators assessed once every three years to ensure their competency and that they are keeping up with changes to regulations and advances in machine technology.”

Davie Andrew – Training Manager 5 December 2012

Favelle Favco Cranes

“The operators have to undergo a competency testing regime but this only tests the basic skills, not more advanced skills that may be required in several areas.”

Alistair McCulloch – Chief Designer 28 November 2012

Federation of Piling Specialists Kent UK

“The usual progression here is that someone spends time on site as a general piling operative. They will be trained during this time as a slinger/signaller (banksman) and they will get an idea of what the rig can do. The minimum period for this is probably about 12 months – but it’s not set in stone, it could be less – and it may be several years.”

Dianne Jennings 8 December 2012

Kone Cranes

“I would think 3 months for basic operational ability and 2 years for a more seasoned operator would be a benchmark.”

Warren Ashton 27 May

Liebherr Crane Manufacturers

“It would be hard to set a defined time on how long it would take to be competent to operate a mobile/crawler crane. I believe there are many variables which could hinder this type of approach.”

Peter Murdocca- National HSE Manager Crane Division 22 April 2012

Lloyds British

“Lloyds British would recommend that the employer appoints a more experienced “hand” to oversee and appraise a newly trained and appointed crane operator and that some form of log book is completed by the operator on a daily basis . The log book can contain the number of hours operated per day, type of machine and the types of lifts that the operator has performed (under supervision).

Steve Downing – 28 November 2012

Middletons Lawyers

Occupational health and safety (OHS) legislation in each Australian jurisdiction imposes obligations upon employers to ensure, to the extent reasonably practicable, the health and safety of persons in the employer’s workplace. One of the fundamental requirements for employers is to provide such training as may be necessary to ensure their employees’ health and safety at work. Consequently, the maintenance of training records becomes an important part of any safety management system.

John Makris - Special Counsel

NT WorkSafe

“Under the Workplace Health and Safety legislation there is no requirement to hold a licence for the operation of excavators or bobcats. The emphasis is on competency to operate safely the particular plant being operated. However, it is a requirement under the Workplace Health and Safety Regulations that employers provide information, instruction and training in the work the worker may be required to perform.”

Fiona Peters – Senior WorkSafe Officer

Pile Drivers USA Local Union 2404

“Our pile driving crane operators are covered by both the Industry Training Authority and Crane Safe B.C. who test both practical and written competency. This however, is for running crane and hoisting. Our crane ops are usually specializing in pile driving on land and water. They ultimately are deemed competent by a foreman. That can take as little as 3 years.”

Kurt Kashuba -President

Pile Driving Contractors Association Florida

“The program typically took 4 years to complete and included work experience, class work and practice in a variety of rigs.”

Steve Hall – Executive Director 4 December 2012

RailCorp

“However, employers (or controllers of the plant) must ensure that the operator is competent to do their job safely....As of 1 October 2011, all Operators must maintain an operator's logbook, which they will record their work activities. This logbook must be endorsed by the RailCorp supervising officer at the completion of the period of work. Operators must produce their logbooks upon request of a RailCorp Officer.”

Gratton Boote - General Manager Plant Hire Services

Safe Work Australia

“Although operators of load shifting equipment are not required to hold a licence or notice of satisfactory assessment under the model WHS laws, persons conducting a business or undertaking still have a general duty to ensure that workers operating this type of plant have been appropriately trained and are competent.

Heath Molloy – Assistant Director Work Health and Safety

Safework SA

“Employers must ensure that operators have received adequate information and training, and/or are supervised, so that any risks to health and safety are minimised. The amount of information, instruction, training and/or supervision required must take into account the complexity of the tasks, the operator’s current skills and ability and other workers on site.”

Tim Wise – Certification Support Officer 14 November 2012

Victorian Crane Association

“There is no upper limit to how many hours, and my contact suggested 100hrs as a good number. He stated that if he saw that you had 100 hrs of supervised operating that was able to be verified, he would be in a comfortable position.”

“It's my recommendation that you log everything to assist you with future HRWL upgrades, as well as some of the many different site specific requirements such as VOC's etc. Depending on any future employers, you may find that logged history invaluable.”

Brent Stacey - Liaison Officer 28 May 2013

WesTrac

“To be called an experience operator this could and may take hundreds of hours of operation on numerous variety of different tasks and complexities.”

Aaron Tuddenham – Operator Trainer 21 November 2012

WorkCover NSW

“Even if a person produces a High Risk Work License to drive a crane, it is still up to the Person Conducting Business or Undertaking to make sure that the person has acquired through training, qualification, experience or a combination of them both the competency to do the task.”

Marlene Duff 20 August 2012

WorkCover NSW

Designers, manufacturers, importers, suppliers, installers, persons that construct or commission and persons with management or control of plant and structures must comply with certain obligations. These include:

“specifying and ensuring adherence to safe work systems and operator competencies”

“safe work systems and **operator competencies** are in place”

Rana King WorkCover Information Centre 17 May 2013

WorkCover NSW

“The Person Conducting a Business or Undertaking has a primary duty of care (section 19, Work Health and Safety (WHS) Act 2011), that must be fulfilled so far as is reasonably practicable, to: provide information, training, instruction and supervision; “

“Persons with management or control of plant **are responsible for the safety of the plant and that it is safely operated** as well as keeping records of all tests, inspections, maintenance, commissioning, decommissioning, dismantling and any alterations, until control of the plant is relinquished. Records are to be available for inspections purposes and anyone who takes control of the plant.”

Sarah Savage 17 May 2013

Worksafe VIC

“It is the employers’ responsibility to ensure their staff are appropriately trained.”

Samantha – Advisor 21 October 2011

PCC Lawyers

A key component of ensuring the health and safety of workers is ensuring the ‘safe use ... of plant, structures and substance’s. Persons conducting a business or undertaking must also ensure ‘the provision of all information, training, instruction or supervision that is necessary to protect all persons from risks to their health and safety arising from work.

Helen Carter

American Concrete Pumpers Association

From: Sue Schumacher <Sue@concretepumpers.com>
Date: 4 June 2013 11:39:27 PM AEST
To: 'Michael Brown' <michael.visiontrends@gmail.com>
Subject: RE: Competency

Hi Michael –

This is the experience time needed to run the various pumping equipment.

3 Months – Grout & Pea Rock
6 Months – Line Pump/General
12 Months – Line Pump/High Pressure
12 Months – Three-Section Boom Pump
12 Months – Four-Section Boom Pump
18 Months – 50-Meter and Larger Boom Pump
6 Months – Separate Placing Boom

If you are interested in a comprehensive 23-day hands on training program, we do have one available for sale, which includes all the DVDs and manuals needed to completely train an operator. You will need a competent pump operator to act as a trainer in order to use this program. [Click here](#) if you would like to see a description of the program or you can call the National Office for more details.

Thanks!

Sue Schumacher

American Concrete Pumping Association (ACPA)
sue@concretepumpers.com
www.concretepumpers.com
614-431-5618 (Phone)
614-431-6944 (Fax)

BC Association for Crane Safety

From: "Fraser Cocks" <fraser@bcacs.ca>

Date: 23 November 2012 3:48:46 AM AEDT

To: <michael.visiontrends@gmail.com>

Subject: Crane Seat Time Requirement - Response from BC, Canada

Thank you for your question. This is not the easiest question to answer. In short we do collect seat time but the requirement or **number of hours vary from crane type to crane type**. I would need more information as to which crane type you are looking at comparing.

Just to provide some background, our system is a holistic approach and competency based. We collect information and have a number of requirements that must be met in order for the operator to be deemed competent and acquire their credential.

We utilize an on-line logbook to capture and track all of these requirements. We are collecting seat time, equipment type, job specific tasks, defined standards competence measurements, photos, drawing, theory exam results, etc. all of which are validated by the employer. The final step of our process is a practical assessment delivered by a third party assessment service provider.

Our logbook is accessed by our main webpage. If you wish, you can set up a profile and have a look at our logbook for yourself. There is no fee and your address will inform us that we probably won't be seeing you here for completion of all of the requirements or be looking for a credential. We have made this open and available because we have found that there are a number of crane operators from other countries that are wanting to come to Canada for work and this enables them to connect and find employment. That was not a design element but an unexpected positive outcome.

You are more than welcome to call or ask further questions. I expect that this response will continue this dialog.

Regards,

Fraser Cocks

Executive Director

BC Association for Crane Safety

604-336-4699

Caterpillar Inc.

From: "Joshua T. Hayes" <Hayes_Joshua_T@cat.com>

Date: 5 December 2012 10:39:38 AM AEDT

To: michael.visiontrends@gmail.com, Howard Hicks
<Howard.Hicks@holtcat.com>

Cc: "Kelley G. Maxwell" <Maxwell_Kelley_G@cat.com>, Shaun Manning
<Shaun.Manning@holtcat.com>

Subject: Re: FW: Excavator Operator Competency

Michael,

In regards to your question below about how much seat time is needed for an excavator Operator to be competent and experienced I feel could be broken down into two different categories. As part of the Caterpillar Instructor team we usually have a guideline that if an Operator has had 1- 3 years of operating experience he would be classified as a competent operator, this Operator would have a very basic understanding of Safety, walkaround inspections, operators compartment, start up/shut down procedures, basic operating procedures based on industry requirements and basic earthmoving fundamentals so an individual can develop skills to operate equipment safely and proficiently.

Once that same Operator has at least 3- 5 + years of experience he or she will gain an enhancement of experienced operator skills and benefit by refining operating techniques and learning application tips and knowledge. All of this also can vary upon the different types of applications that the Operator may be working in, an excavator Operator that may be only loading trucks or bulk earthmoving may learn the application faster than an Operator that is working with underground utilities digging around other personnel, trench boxes, pipe and holding grade to 1 inch +/-, this application will definitely require more skill and time in the seat.

Hopefully my reply will shed some light on your question, if you have any questions please let me know!

Regards,

Josh Hayes

Sr. Marketing Training Consultant

Edwards Demonstration Center

Customer Lifecycle Solutions Department

Caterpillar Inc.

W(309) 675 8311 C(309) 255 1020 F(309) 675 6903

Hayes_Joshua_T@cat.com

Concrete Pumps Association UK

From: "Haydn Steele" <haydn.steele@cpa.uk.net>

Date: 8 June 2013 12:32:23 AM AEST

To: <michael.visiontrends@gmail.com>

Subject: Concrete Pumps

Michael

If someone was coming in to the industry as a novice with no industry experience then it would take approximately 42 hours of training. There would also be a requirement for the candidate to have an additional or equivalent of 7 hours of safety and induction training. This however would not deem the operator competent, he would only be trained. He would only become competent over a period of time by doing a vocational qualification and that could take up to two years depending on their abilities.

Hope this of help.

Kind regards

Haydn Steele
Safety & Training Manager
CPA
27/28 Newbury Street
Barbican London EC1A 7HU
Tel. 020 7796 3366

Crane Certification Association of America

www.CCAAweb.net

From: Ray Feidt <RFeidt@stephensorequipment.com> **Date:** 20 November 2012 6:22:32 AM AEDT **To:** "visiontrends1@bigpond.com" <visiontrends1@bigpond.com> **Cc:** "Caren VanZant (admin@ccaaweb.net)" <admin@ccaaweb.net>, Jim Jota <Jim.Jota@waterweightsinc.com>, "Ed Shapiro (ed@hescousa.com)" <ed@hescousa.com> **Subject: Crane operator qualification**

Mr. Brown,

This is somewhat a hard question to judge because not all people learn the trade of operating a crane at the same rate. It also has much to do with how the operator was trained. In the US, many states have adopted certification programs to assess operator

skill level. One of these certification programs is the NCCCO (National Commission for the Certification of Crane Operators) www.NCCCO.org.

This certification is a testing process that tests operators' skill level by written exams and also by practical exams.

In the US, it has been pretty much accepted if you can pass the certification exams, you are deemed to have sufficient level of proficiency to operate. Not that an operator is an expert because they can pass the certification exams but they are generally deemed to be at an acceptable level of proficiency.

Another consideration is what type of crane the operator will operate.

I personally see many crane operators a year in the US. Many have operated cranes for several years and do not have the skill level required to pass the certification practical exam. This is somewhat a sad commentary on the level of training these operators are getting.

Back to your question. I would say if an operator has 4000 hours of actual seat time, he/she should be fairly proficient at operating the type of crane they have experience in.

The problem that usually occurs is when you ask someone how many hours of time they have actually operating, you get erroneous numbers. The other thing that happens is what type of crane work was being performed during these hours.

As you can see, it is a moving target as to how many hours of actual seat time is enough. This is why so many jurisdictions have now gone to testing processes. I would encourage you to adopt a testing process that qualifies operators and not just rely on experience or on what someone says is experience.

I hope this helps!

Thank you!

Ray Feidt, President

Crane Certification Association of America

Crane Institute of America

From: James Headley [mailto:jheadley@craneinstitute.com] **Sent:**

Tuesday, 20 November 2012 7:27 AM **To:**

visiontrends1@bigpond.com **Subject:** Operator Qualification

Mike,

In response to your question regarding operator competency we in the USA do not have any time periods established by our industry or government standards. Minimum

operator certification is established by passing certification exams. Recertification requires 1,000 hours operation over a period of 3 years plus passing an exam. We at the Crane Institute have a 3 year requirement plus passing written exams to issue a CIA qualification. But as you know someone has to actually determine if an operator is qualified to operator a particular crane. I've always wanted to go to Australia so I will swap you a trip here to Orlando and Disney World for a trip to Aussie land. Stay in touch.

James Headley
Director
Crane Institute of America, Inc.
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www.craneinstitute.com

Crane and Safety Services

From: Davie Andrew <davie@craneandsafety.com>
Date: 5 December 2012 9:46:03 PM AEDT
To: "visiontrends1@bigpond.com" <visiontrends1@bigpond.com>
Subject: Crane operator competency

Hi

We do training in Asia and Africa where we advise clients to have their trained operators assessed once every three years to ensure they competency and that they are keeping up with changes to regulations and advances in machine technology

In the UK we use another system where the operator has to supply evidence of various successful crane lifts he has completed, this has to be supplied within two years of passing the initial operator assessment and he is visited by the assessor at some unannounced point within this time frame where an observation and a Q & A session is carried out, the client is also consulted about his operating ability, the advantage of this system is that if an operator is two years lifting roof beams he would not be deemed competent to work on a complex petro-chemical site for example

If they cannot supply sufficient evidence within the two years, the operator has to take the initial test again and the procedure starts from scratch

Hope this helps

Cheers
Davie Andrew

Crane & Safety Services Ltd
Eskeer South, Ballinalee
Co Longford, Ireland

Crane & Safety Services Ltd
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Mob 0044 (0) 7710425572
visit our site www.craneandsafety.com

Favelle Favco

From: Alistair McCulloch <alistairm@favellefavco.com.au>

Date: 28 November 2012 11:55:29 AM

To: "michael@thebrownbook.com.au" <michael@thebrownbook.com.au>

Cc: BEN TING <ben@favellefavco.com.au>

Hi Michael,

This is a very difficult question to answer and unfortunately there is no one answer to fit it.

As you are aware there are several ways that people can become a crane operator, the most obvious ways are for operators to do a number of weeks driving a crane under instruction, prior to carrying out an approved training course and passing. The operators have to undergo a competency testing regime but this only tests the basic skills, not more advanced skills that may be required in several areas.

Once the operator has completed this course and test, he is theoretically a competent driver, but he is not really experienced. We would expect that an operator would have to carry out at least a 6 months driving before they would be considered competent and experienced. But there are some individual drivers who could do this in a smaller timeframe.

Each individual company would have their own individual requirements of experience. Again if they intend to work offshore then the companies usually insist on much higher and longer periods of driving experience.

Regards

Alistair McCulloch

Chief Designer
Favelle Favco Cranes
28 Yarrunga Street
Prestons NSW 2170
Australia
Tel : +612 96071258 Mob: +61 0417680733

Federation of Piling Specialists Kent UK

Michael

I've spoken to some of the trainers about this and inevitably the answer isn't as straightforward as the question.

Piling rigs vary according to the piling system and some systems are more complex than others (and some rigs are larger and more sophisticated than others) – which makes generalisation difficult. Some commented that someone driving a vibro piling rig could be competent in a couple of months; but if its large diameter rotary bored piling they have to deal with different ground conditions and different site conditions and it's a continuous learning experience over their whole career.

The usual progression here is that someone spends time on site as a general piling operative. They will be trained during this time as a slinger/signaller (banksman) and they will get an idea of what the rig can do. The minimum period for this is probably about 12 months – but it's not set in stone, it could be less – and it may be several years.

There is usually no formal training and the new driver learns by being in the cab with an experienced driver.

There is a fairly formal system of qualifications here – and a National Vocational Qualification (NVQ) is generally taken as evidence of competence. This involves on-going assessment and correctly answering a bank of 20 theory questions for each unit (there are 7 units leading to a rig operator NVQ).

There is a card scheme in operation – called the Construction Plant Certification Scheme (CPCS). In order to obtain a CPCS card a driver must pass a formal, onsite, assessment where they demonstrate their competence – and pass a health and safety theory test. They can get a Red Trainee CPCS card once they have met these 2 criteria – but it is only turned into a Blue Qualified Operator CPCS card when they have obtained the NVQ. When the system is working properly, someone without a CPCS card won't be allowed to operate a rig on site.

I hope this is helpful. Please feel free to ask any supplementary questions and I'll do my best to find an answer.

Best regards
Dianne Jennings
Federation of Piling Specialists Forum Court 83 Copers Cope
Road Beckenham Kent BR3 1NR Tel: 020 8663 0947 Fax:

Kone Cranes

From: Warren Ashton [<mailto:Warren.Ashton@konecranes.com>]
Sent: Monday, 27 May 2013 11:51 AM
To: Michael Brown
Subject: RE: Website Enquiry

Hi Michael,

There are no real institutional training programs that I know of for gantry cranes, only awareness (which we provide) and rigging based programs.

I would think 3 months for basic operational ability and 2 years for a more seasoned operator would be a benchmark.

Regards,

Warren

Liebherr Crane Manufacturers

From: "Murdocca Peter (LAS-LAC)" <Peter.Murdocca@liebherr.com>

Date: 22 April 2013 2:36:06 PM AEST

To: "michael.visiontrends@gmail.com" <michael.visiontrends@gmail.com>, "Grady Tom (LAS-LAN)" <Tom.Grady@liebherr.com>

Subject: FW: Crane training

Hi Michael & Tom,

It would be hard to set a defined time on how long it would take to be competent to operate a mobile/crawler crane. I believe there are many variables which could hinder this type of approach, i.e.

- Learning ability of trainee,
- Quality of training provided to the trainee,
- Diverse nature of job sites/work the trainee may not encounter in their allocated training framework,
- Variations of cranes types (i.e. differences in configurations: Someone who is deemed 'competent' by training on a 55ton mobile crane, will not be competent to set up and operate a 500ton mobile crane)

It is my view that it is incumbent on individual crane businesses to determine all of these variables and construct training packages to suit their business activities, to a time frame that is achievable. Examples of such training include;

- Product training from manufacturer of crane
- Utilising industry body training materials (i.e. CICA)
- Applying for a national licence to perform high risk work
- Observational and practical 'on site' training facilitated by the business operator.

Michael, if you have any further queries, do not hesitate to contact me.

Kind Regards,

Peter Murdocca
National HSE Manager
Earthmoving Division

Crane Division

LIEBHERR-AUSTRALIA PTY.LTD.

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Erskine Park NSW 2759

Telephone: +61 (0) 2 9852 1800 Facsimile: +61 (0) 2 9852 1899
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Lloyds British

From: Steve Downing <Steve.Downing@lloydsbritish.com>

Date: 28 November 2012 8:56:31 AM AEDT

To: "michael.visiontrends@gmail.com" <michael.visiontrends@gmail.com>, David Powles <David.Powles@lloydsbritish.com>, Ian White <Ian.White@lloydsbritish.com>

Subject: Re: Operator Competence and Experience - Australia

Hi Michael,

Thank you for contacting Lloyds British in the UK and we would be more than happy to try and assist you in improving safety in the workplace in Australia.

There is no straight answer to your question and the determination of operator competence would have to start from the point when the operator has completed his basic training (on whatever type of crane) and this competence would have to be maintained for as long as he or she is using the particular work equipment.

In the UK we have "dual" duties of care placed on the employer in both Criminal and Civil law and there is a clear duty to provide information, instruction and training ".

Competence should be demonstrated at the conclusion of any formalised "off the job training" provided by a reputable training provider, but of course the individual then starts to gain further experience from that moment afterwards .

Lloyds British would recommend that the employer appoints a more experienced "hand" to oversee and appraise a newly trained and appointed crane operator and that some form of log book is completed by the operator on a daily basis . The log book can

contain the number of hours operated per day, type of machine and the types of lifts that the operator has performed (under supervision).

The employer would at some stage make the determination that the operator is not just competent but is now at what is described as being at “experienced worker standard” (that is he or she can operate the crane without supervision).

Continuation or Conversion training must be provided if the operator is required to perform either tasks over and above the standard that they have been trained to or if they are required to operate another type of machine that may have “differences” including a greater SWL.

In the UK, the courts do not recognise that “competence lasts a life time” and that working with equipment or machinery does pose greater dangers. This concept is regarded internationally as the basis for providing either refresher training or assessment and test of the ongoing competence of an operator of work equipment.

There is no set period of when someone should be either retrained or retested, but between 2 to a maximum of 5 years is a good average guide. Lloyds British would recommend “no later than every two -three years. And we would further advise to consider a shorter time period for refresher training and or assessment if your risk assessment identifies significant hazards and risk are present. If the skill set required is regarded as being above average in worker competency, or if an operator has not practised his or her skills on a regular basis.

There are two (of many) UK standards which may help you and you should be able to download these free from Google – L117 ACOP for Rider Operated Lift Trucks and BS ISO 15513 – Operator competencies for mobile crane drivers, slingers, trainers and assessors.

Middletons

Requirements to Train and Record Keeping under Occupational Health and Safety Legislation

Occupational health and safety (OHS) legislation in each Australian jurisdiction imposes obligations upon employers to ensure, to the extent reasonably practicable, the health and safety of persons in the employer's workplace. One of the fundamental requirements for employers is to provide such training as may be necessary to ensure

their employees' health and safety at work. Consequently, the maintenance of training records becomes an important part of any safety management system.

Under the various State and Territory OHS regulations, there are specific requirements for training and the retaining of training records. Examples include training in consultative arrangements, training in the use of specific plant, when carrying out of construction work, confined spaces work and work in hazardous facilities.

Harmonised workplace health and safety laws are due to commence on 1 January 2012. The primary obligation under the proposed Model Work Health and Safety Act (**Model Act**) will be upon all persons conducting businesses or undertakings (**PCBU**) to ensure, so far as is reasonably practicable, the health and safety of workers engaged, or cause to be engaged by the person, and, workers whose activities in carrying out work are influenced or directed by the person, whilst the workers are at work in the business or undertaking. This obligation includes the requirement for the provision of any training that is necessary to protect all persons from risks to their health and safety arising from work carried out as part of the conduct of the business or undertaking. The definition of a worker is a broad one and includes employees, contractors or subcontractors, employees of contractors or subcontractors, employees of labour hire companies, outworkers, apprentices and trainees, work experience students and volunteers. Establishing that workers are appropriately trained will be a fundamental requirement for compliance under the Model Act. Bear in mind, that the Model Act provides for significant penalties for PCBU's who fail to meet the requisite safety standard.

The Brown Book is one method of capturing training records which is readily accessible at the worksite.

Should you wish to discuss these matters further, please do not hesitate to contact John Makris, Special Counsel at Middletons on (02) 9513 2564.

NT WorkSafe

Good afternoon Michael

The reference number for your enquiry is WAT2011-06920 please quote this number for any further enquiries you may have in relation to this matter.

Under the Workplace Health and Safety legislation there is no requirement to hold a licence for the operation of excavators or bobcats. The emphasis is on competency to operate safely the particular plant being operated. However, it is a requirement under the Workplace Health and Safety Regulations that employers provide information, instruction and training in the work the worker may be required to perform:

43 Information, instruction and training

(1) An employer shall ensure that a worker receives sufficient information, instruction and training in the work that the worker may be required to perform to enable the worker to perform the work without risk to the health and safety of the worker or any other person.

(2) The information, instruction and training to be provided under subregulation (1) shall be determined according to the nature of the risk associated with the work to be performed by the worker and the competency of the worker, and shall be provided in a manner appropriate to the workplace.

(3) An employer shall ensure that:

(a) information, instruction and training provided under subregulation (1) is reviewed and revised at regular intervals; and

(b) a record is kept of the information, instruction and training provided to a worker.

NT WorkSafe do not set a length of time an operator is deemed to be competent. This is required to be determined by the employer. Please note that whilst there isn't a licence requirement, there are still training courses available as an option to show competency.

I trust this meets your requirements however if you require any further information please do not hesitate to contact me on 1800 019 115.

Regards

Fiona Peters
Senior WorkSafe Officer
NT WorkSafe
Northern Territory Government
Phone: 1800 019 115
Fax: (08) 8999 5141
E-mail: fiona.peters@nt.gov.au
Web: www.worksafe.nt.gov.au
1st Floor, Darwin Plaza, 41 Smith Street Mall, Darwin GPO Box 1722, Darwin,
NT 0801, Australia

Pile Drivers USA Local Union 2404

Hi Michael,

Our pile driving crane operators are covered by both the Industry Training Authority and Crane Safe B.C. who test both practical and written competency. This however, is for running crane and hoisting. Our crane ops are usually specializing in pile driving on land and water. They ultimately are deemed competent by a foreman. That can take as little as 3 years. Hope this helps,

Best regards,

Kurt Kashuba

Local 2404

Pile Driving Contractors Association Florida

From: Steve Hall <Steve@piledrivers.org>

Date: 4 December 2012 2:57:30 AM AEDT

To: "Michael@thebrownbook.com.au" <Michael@thebrownbook.com.au>

Subject: RFI - Piling Rig Operators and Safety

Michael:

The following was provided by a PDCA contractor member who works primarily in Florida.

The Operating Engineers have an apprenticeship program for operator trainees. The program typically took 4 years to complete and included work experience, class work and practice in a variety of rigs. The standards here at our regional local got fairly lax due to retirements and retention issues. Other locals might have very strong programs. I have the impression that the programs on the West Coast, Northeast and Mid-West are probably pretty comprehensive due to stronger unions in those areas.

The union started pushing a national certification, which has been adopted by OSHA. Although there have been some issues with implementation, operators in Florida will soon all need an NCCO certification card, which shows operating proficiency based on satisfactory completion of a written and practical exam.

Stevan A. Hall

Executive Director
Pile Driving Contractors Association
1857 Wells Road
Suite 6
Orange Park, FL 32073 PH: 904-215-4771
Toll Free: 888-311-PDCA (7322) Cell: 904-742-1634
steve@piledrivers.org www.piledrivers.org

RailCorp

Hello Michael,

Rail Load shifting machines

New work health and safety laws come into effect in NSW on 1 January 2012. They will harmonise work health and safety requirements across Australia, including licensing activities.

To transition to the new laws, from 30 September 2011, operators in NSW will no longer need a certificate of competency to operate a:

Front end loader
Front end loader/backhoe
Front end loader of the skid steer type
Excavator

However, employers (or controllers of the plant) must ensure that the operator is competent to do their job safely.

RailCorp is currently developing a competence assurance system for operators of load shifting machines. Until this system is introduced, for operators to be engaged by RailCorp they must have the following;

A previous WorkCover Certificate of Competency for the machine style OR a Statement of Attainment in one of the following units of competency from the DMC training package.

RIIMPO319A – Conduct backhoe/loader excavator operations RIIMPO320A – Conduct civil construction excavator operations RIIMPO321B – Conduct civil construction wheeled front end loader operations RIIMPO322A – Conduct civil construction tracked front end loader operations RIIMPO318B – Conduct civil construction skid steer loader operations RIIMPO332A – Conduct operations with skid steer loader Operator competency Operators who have existing WorkCover certificates of competency will have until the 30 March 2012 to obtain a Statement of Attainment in the relevant national unit of competency.

As of 1 October 2011, all Operators must maintain an operator's logbook, which they will record their work activities. This logbook must be endorsed by the RailCorp supervising officer at the completion of the period of work. Operators must produce their logbooks upon request of a RailCorp Officer.

For further information, refer to WorkCover fact sheet - load shifting machines issued June 2011 or contact Paul Radford on 0438 097 499.

How do I get a Statement of Attainment by 30 March 2012?

A Statement of Attainment for a relevant national unit of competency (see list below) from the DMC training package is a mandatory RailCorp requirement from 30 March 2012. A Statement of Attainment must be produced to Plant Hire Services and is the enabling competency to obtain authorisation to work on RailCorp projects.

Conduct backhoe/loader excavator operations Conduct civil construction excavator operations Conduct civil construction wheeled front end loader operations Conduct civil construction tracked front end loader operations Conduct civil construction skid steer loader operations Conduct skid steer loader operations Any contractors who have been trained through RailCorp Learning & Development in mobile plant operations will already have a Statement of Attainment that must be presented to Plant Hire Services prior to 30 March 2012. Contractors who have been trained through a Registered Training Organisation (RTO) and do not have a Statement of Attainment should go back to the RTO where they completed their training and request one.

For existing WorkCover licence holders (Yellow card holders) who have not completed recognised training leading to a national unit of competency, they are advised to contact an RTO to undertake recognition of their prior learning and obtain a Statement of Attainment.

To locate an RTO, click on the above links.

Logbook requirement - from 1 October 2011 As of 1 October 2011, all operators must maintain an operator's logbook to record their work activities. The logbook must be endorsed by the RailCorp supervising officer at the completion of the period of work to attest that the work has been performed. Operators must produce their logbooks on the request of a RailCorp officer. A logbook can be any record of work completed for RailCorp and operators can design their own logbooks or use the template provided.

Load shifting machine operators logbook (490KB, PDF)

Why do I have to keep a logbook?

When RailCorp introduces its competence assurance system, operators will be required to provide evidence of the work undertaken over the last 12 months in the RailCorp environment. This is to provide assurance that the operators being hired have the relevant experience to conduct the job.

What happens if I forget to take my logbook on a job?

The logbook must be produced for recertification purposes as evidence of work undertaken in the RailCorp environment. It must also be produced on demand at the request of a RailCorp officer to provide assurance that the operator has the relevant experience to do the job.

More information

For further information on these requirements, contact Paul Radford on 0438 097 499.

Gratton Boote
General Manager
Plant Hire Services
Ron Devitt
General Manager
Learning and Development

SafeWork Australia

Hi Michael,

Thanks for your enquiry.

Safe Work Australia is the Australian Government statutory agency with the primary responsibility for improving work health and safety for all Australian workplaces. Safe Work Australia is a national policy making body and not a regulator for work health and safety. Safe Work Australia has developed model Work Health and Safety (WHS) legislation to harmonise WHS laws across Australia. WHS laws commenced in New South Wales, Queensland, the Australian Capital Territory, the Commonwealth and the Northern Territory on 1 January 2012. Tasmania is expected to commence the WHS laws on 1 January 2013. South Australia, Victoria and Western Australian still operate under their own jurisdictional OHS legislation.

Although operators of load shifting equipment are not required to hold a licence or notice of satisfactory assessment under the model WHS laws, persons conducting a business or undertaking still have a general duty to ensure that workers operating this type of plant have been appropriately trained and are competent. I suggest you contact your local state WHS regulator for advice on how you might determine the competency requirements for your organisation, as they can vary depending on the equipment and the task. A Verification of Competency is a service provided by a commercial enterprise among others. A third party assessment of competency is not required but may be useful.

With respect to your question on trainer/assessor liability when providing these sorts of services, this is more a commercial issue related to what services are requested and what services are delivered. RTOs, trainers and/or assessors should meet any

obligations they might have under relevant vocational education and training (VET) laws. You might wish to contact ASQA – Australian Skills Quality Authority - the national VET regulator to discuss this particular aspect of your enquiry via the ASQA info line on 1300 701 801.

Kind Regards
Heath

Heath Molloy
Safe Work Australia
Plant & Structures Team | Assistant Director Work Health & Safety Branch GPO Box 641
Canberra ACT 2601 Location code: C220NB2 Phone (02) 6121 5440 | Fax (02) 6276 7591
|

Safework SA

From: Wise, Tim (DPC) [mailto:Wise.Tim@dpc.sa.gov.au]
Sent: Monday, 14 November 2011 3:53 PM
To: michael@thebrownbook.com.au
Cc: Bau, Nina (DPC)
Subject: Length of time for competency of excavator operation

Dear Michael,

I have received your email in regards to your question on the length of time an operator should be signed off under duty of care.

Please have a look at our website fact sheets for the new WHS legislation located at :
http://www.safework.sa.gov.au/whs/show_page.jsp?id=110820

The following extract answers your question:

“Employers must ensure that operators have received adequate information and training, and/or are supervised, so that any risks to health and safety are minimised. The amount of information, instruction, training and/or supervision required must take into account the complexity of the tasks, the operator’s current skills and ability and other workers on site.

Ongoing training should be provided to maintain the operator’s competency level and ensure new workers are able to undertake the work safely. All other general duties regarding health and safety still apply.”

If you have any further questions please let me know.

Regards

Tim Wise Certification Support Officer Compliance & Investigation Unit
Safework SA, Department of the Premier and Cabinet PH: +61 8303
9991 M: 0401 716 865 F: +61

Victorian Crane Association

From: Brent Stacey <brent_vca@bigpond.com>
Date: 29 May 2013 10:19:44 AM AEST
To: Stuart Short <cranedriverstu@gmail.com>
Subject: Re: VCA query: Re competency log book

Yes Stuart, that would be my understanding; all HRWL upgrades would require you sit for another test, therefore there will be a practical component to demonstrate competency. If you have verifiable logged hours, you should be able to use those to assist any further capacity upgrades in the future. It's my recommendation that you log everything to assist you with future HRWL upgrades, as well as some of the many different site specific requirements such as VOC's etc. Depending on any future employers, you may find that logged history invaluable.

Cheers for now,

Brent/VCA.

On 29/05/2013, at 10:04, Stuart Short <cranedriverstu@gmail.com> wrote:

Good morning Brent

Thank you for your quick reply yesterday. That was much appreciated. I do have one more question for you, sorry I should have asked yesterday. That question is: if and when I'm to move on to operating larger cranes do I need to log my hours again for purpose of verification of competency and if so would it be for a similar time frame as my initial log book period?

Thanks again for your time.

Hope to hear from you soon.

Cheers Stuart.

From: "Brent Stacey" <brent_vca@bigpond.com>
Date: 28 May 2013 12:33:10 PM AEST
To: <cranedriverstu@gmail.com>
Cc: <admin@cranesvic.com.au>
Subject: VCA query: Re competency log book

Good Afternoon Stuart,

Thanks for your enquiry.

As you may be aware, there have been a number of changes to High Risk Work licencing over the past few years. The latest changes are still an evolving picture, but I'll fill in the gaps and answer your question as best as I can.

I rang one of our member companies who provide high quality training, and their response is that the logged hour requirement before obtaining the slew ticket you are asking about is 40 hours. If you are already logging your hours, you are off to a flying start and I recommend that you continue to keep logging your supervised hours in the crane. It may take more than 40 hours to be able to demonstrate competency.

There is no upper limit to how many hours, and my contact suggested 100hrs as a good number. He stated that if he saw that you had 100 hrs of supervised operating that was able to be verified, he would be in a comfortable position.

WorkSafe Victoria has a licencing division who may be able to assist with technical enquiries, but I'm more than comfortable with the answers above.

If you have any requirements for guidance on who to speak with next , or would like a recommendation on what steps to take, I can suggest some VCA members and stakeholders who offer training. Just let me know what area of Victoria you are in so we can work out which courses are closer to you.

All the best and feel free to email me back if needed.

Cheers for now,

Brent Stacey
Liaison Officer
Victorian Crane Association
e. brent_vca@bigpond.com
www.cranesvic.com.au



Westrac

Begin forwarded message:

From: Aaron Tuddenham <Aaron.Tuddenham@westrac.com.au>

Date: 21 November 2012 5:40:09 PM

To: "michael@thebrownbook.com.au" <michael@thebrownbook.com.au>

Subject: RE: Thank you for your Service/Operator Training inquiry I
Tracking# 00150772

Michael

You have asked an interesting question. To deem a candidate competent on an excavator, would usually take 1-4 days depending on their level of skill or previous experience. Bearing in mind that competent is the basics of machine operation. Covering the safety, basic operation and machine familiarisation of that particular piece of plant. At this stage they still need to practice numerous skills before you would consider them to be an experienced operator. Similar to, you getting your car drivers licence when younger. Yep you could drive a car and have the basics on how to do it, but still have a lot to practice and learn.

To be called an experience operator this could and may take hundreds of hours of operation on numerous variety of different tasks and complexities. The candidates ability to absorb information is also a factor in the move towards experience operator, understanding that the industry and machinery are changing at a rapid rate this ability to be dynamic is critical in their ongoing learning curve.

Hope this helps you with what you were after, if not feel free to give me a call.

Thanks

Aaron Tuddenham | WesTrac Pty Ltd | Operator Trainer | WesTrac
Institute NSW/ACT
t: (02) 4964 5200 | **m:** 0467 807 132 | **i:** www.westrac.com.au

WorkCover NSW

From: contact [mailto:contact@workcover.nsw.gov.au]

Sent: Monday, 20 August 2012 4:31 PM

To: visiontrends1@bigpond.com **Subject:** FW: Enquiry Items (Employer Enquiry) - 10-Aug-2012 - Michael Brown

Dear Michael

Thank you for your email to WorkCover NSW.

Even if a person produces a High Risk Work License to drive a crane, it is still up to the Person Conducting Business Or Undertaking to make sure that the person has acquired through training, qualification, experience or a combination of them both the competency to do the task.

Renewal of a High Risk Work (HRW) license does not involve a requirement to provide evidence or proof of continued operation of the item of plant or other scheduled work.

Regards,
Marlene Duff

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For more information on WorkCover please visit our web site at:

<http://www.workcover.nsw.gov.au>

This message, including any attached files, is intended solely for the addressee named and may contain confidential information. If you are not the intended recipient, please delete it and notify the sender. Any views expressed in this message are those of the individual sender and are not necessarily the views of WorkCover NSW.

WorkCover NSW

From: contact <contact@workcover.nsw.gov.au>

Date: 17 May 2013 4:06:33 PM AEST

To: "visiontrends1@bigpond.com" <visiontrends1@bigpond.com>

Subject: FW: Enquiry Items (Employer Enquiry) - 14-May-2013 - Michael Brown

Dear Michael,

Thank you for your further email to WorkCover NSW.

Legal duties and plant

Designers, manufacturers, importers, suppliers, installers, persons that construct or commission and persons with management or control of plant and structures

must comply with certain obligations.

These include:

- identifying hazards and controlling risks
- ensuring appropriate [guarding](#), operational controls and warning devices are in place and in use
- specifying and ensuring adherence to safe work systems and operator competencies
- registering plant designs and items of plant
- maintaining, repairing, testing, cleaning, installing, assembling , constructing, commissioning or decommissioning, using and selling plant appropriately
- **providing information to other persons.**

The person with **management or control of plant at the workplace** must ensure:

- safe work systems and **operator competencies** are in place
- supervision and information, such as testing, specifications for use, identified faults, maintenance and record keeping.

As previously advised, the [Work Health and Safety Regulation 2011](#) states;

193 Control of risk

(1) A manufacturer of plant must ensure the following:

(a) that the plant is manufactured and inspected having regard to the information provided to the manufacturer by the designer of the plant under the Act and this Regulation,

(b) if the information provided to the manufacturer by the designer of the plant under the Act and this Regulation requires the plant to be tested—that the plant is tested in accordance with that information,

(c) if, during the manufacturing process, any hazard is identified in the design of the plant for which the designer has not provided a control measure:

(i) that the hazard is not incorporated into the manufacture of the plant, and

(ii) that the designer of the plant is given written notice of the hazard as soon as practicable, and

(iii) that all reasonable steps are taken to consult with the designer of the plant in relation to the alteration of the design to rectify the hazard.

Maximum penalty:

(a) in the case of an individual—\$6,000, or

(b) in the case of a body corporate—\$30,000.

(2) A manufacturer of plant must ensure that, if it is not possible to inform the designer about the hazard in accordance with subclause (1):

(a) the risk is eliminated, so far as is reasonably practicable, or

(b) if it is not reasonably practicable to eliminate the risk, the risk is minimised so far as is reasonably practicable.

Note. *WHS Act—section 23 (see clause 9).*

(3) A manufacturer to whom subclause (1) (c) applies must not manufacture the plant until:

(a) the designer gives the manufacturer the revised information or written instruction under clause 188, or

(b) the manufacturer eliminates or minimises the risk under subclause (2).

Note. *WHS Act—section 23 (see clause 9).*

(4) If the designer notifies a manufacturer of plant under clause 188, the manufacturer may proceed in accordance with the designer's original information.

And

195 Information must be obtained and provided

A manufacturer of plant must:

(a) take all reasonable steps to obtain the information required to be provided to the manufacturer by the designer of the plant under section 22 (4) (a) and (c) of the Act and clauses 187 and 188, and

(b) ensure that a person to whom the manufacturer supplies the plant is, at the time of supply, provided with the information provided to the manufacturer by the designer under section 22 (4) (a) and (c) of the Act and clause 187, and

(c) if the manufacturer acts in accordance with clause 193 (1) (c), ensure that a person to whom the manufacturer supplies the plant is provided with the information, applicable to the plant, that is required to be provided by the designer under sections 22 (4) (a) and (c) of the Act and clause 188.

Maximum penalty:

(a) in the case of an individual—\$3,600, or

(b) in the case of a body corporate—\$18,000.

Please also refer to the information that has been previously supplied regarding the development, by the PCBU (- the new term for employer), of safe operating procedures.

You may also wish to specify the type of plant and / or machinery so we may endeavour to further answer your query.

I hope this information is of assistance to you however, should you have further enquiries please contact us again.

Regards,

Rana King

on behalf of Contact mailbox
WorkCover Information Centre

WorkCover NSW

92-100 Donnison Street, Gosford NSW 2250

Phone **13 10 50**

Email: Contact@workcover.nsw.gov.au

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WorkCover NSW

On 17/05/2013, at 9:24 AM, contact <contact@workcover.nsw.gov.au> wrote:

Dear Michael,

Thank you for contacting WorkCover NSW.

The Person Conducting a Business or Undertaking (PCBU) has a primary duty of care ([section 19](#), Work Health and Safety (WHS) Act 2011), that must be fulfilled so far as is reasonably practicable, to:

- ensure the health and safety of your workers and others in your workplace;

- provide and maintain a work environment that is without risks to anyone's health and safety;
- provide and maintain safe plant and structures;
- provide and maintain safe systems of work;
- ensure the safe use, handling and storage of plant;
- provide adequate facilities for the welfare of your workers;
- **provide information, training, instruction and supervision;**
- monitor the health of your workers and the conditions of your workplace;
- maintain any accommodation that you make available to a worker for the purposes of carrying out their duties.

[Chapter 5](#) of the *Work Health and Safety (WHS) Regulation 2011* sets out the general duties for:

- PCBU's who design, manufacture, import or supply plant and structures (Divisions 2 - 5)
- PCBU's who install, construct or commission plant and structures (Division 6)
- PCBU's who have responsibility for the management or control of plant (Division 7), and
- The design and item registration requirements (Part 5.3)

Persons with management or control of plant **are responsible for the safety of the plant and that it is safely operated** as well as keeping records of all tests, inspections, maintenance, commissioning, decommissioning, dismantling and any alterations until control of the plant is relinquished. Records to be available for inspections purposes and anyone who takes control of the plant.

Safe Operating Procedures

Manufacturer's owner's manuals are a valuable source for developing safe operating procedures, as the manufacturer provides this detailed information specific to the type of plant and machinery. New owners can use this information to write their own safe operating procedures, however they need to integrate the procedures into their particular work environment to ensure other processes and procedures are not adversely affected and an overall safe workplace is maintained.

Even if safe operating procedures have been developed and implemented, over time workers can become less vigilant and lethargic, and unsafe practices can

easily develop. Incidents can still occur to very experienced operators when they fail to continuously follow safe operating procedures.

For this reason an employer should also develop and implement a safe operating procedures review system, whereby the safe operating procedure is checked and reviewed in detail on a regular basis, for example every 12 months or whenever a process is changed. A convenient time to schedule the full review process for plant and machinery is perhaps when it is shut down for regular important maintenance.

Further information is available in the Code of practice: [*Managing risks of plant in the workplace*](#).

I hope this information is of assistance to you, however should you have further enquiries, please contact us again.

Regards,

Sarah Savage

On behalf of Contact Mailbox
WorkCover NSW
92-100 Donnison Street, Gosford
Locked Bag 2906, Lisarow NSW 2252
PH: 13 10 50

WORK SAFE ► HOME SAFE

WorkSafe VIC

From: Advisory_Service@worksafe.vic.gov.au
[mailto:Advisory_Service@worksafe.vic.gov.au]
Sent: Friday, 21 October 2011 3:40 PM
To: michael@thebrownbook.com.au
Subject: HS27 Re: HS 88 Re: HS99 Re: HS77: Re: Competency

Hi Michael,

It is the employers' responsibility to ensure their staff are appropriately trained. If no records are available to prove training, more training will be required.

Should you have any further queries or issues, feel free to contact the WorkSafe

Advisory Service on 1800 136 089 or 03 9641 1444 or visit us on the web at <http://www.worksafe.vic.gov.au>.

Advisory Service information and advice is prepared in the context of the information you have provided in your email. Whilst care has been taken to provide accurate information and advice, the Advisory Service has not endeavoured to advise on all possible contingencies and therefore not intended for other situations or circumstances, as this may affect this advice.

Prior to acting upon any information or advice offered by the Advisory Service, you will need to consider your individual circumstances to determine the application of the advice to any additional statutory obligation or duty relevant to your query.

Kind Regards,

Samantha

Advisor