

WORK HEALTH & SAFETY POLICY

Document DR-WHS-POL-01 — the commitment everything else in this system serves.

DOCUMENT ID

DR-WHS-POL-01

VERSION

1.0

APPROVED BY

Straun Cameron, Managing
Director

ISSUED

3 July 2026

REVIEW DUE

July 2028

The current version of this document lives at diverseroutes.com.au — printed or downloaded copies are uncontrolled.

OUR COMMITMENT

Diverse Routes Pty Ltd delivers training in skills where the consequences of getting it wrong are serious — working at heights, confined spaces, breathing apparatus, emergency response and vehicle operation. We hold a simple position: **the way we run our own business must meet the standard we teach.**

Diverse Routes Pty Ltd, as a person conducting a business or undertaking (PCBU) under the *Work Health and Safety Act 2011* (Qld), is committed to:

- providing and maintaining a working and learning environment where risks to health and safety are eliminated where practicable, and otherwise minimised so far as is reasonably practicable;
- meeting or exceeding the requirements of the *WHS Act 2011* (Qld), *WHS Regulation 2011* (Qld), and applicable codes of practice;
- protecting the health and safety of everyone our work affects — clients, students, host-site personnel and the public;
- consulting with clients, host PCBUs and learners on matters that affect their health and safety, and cooperating with the safety systems of every site we work on;

- identifying hazards, assessing risks and applying the hierarchy of controls before work starts — and stopping work when it can't be done safely;
- reporting, recording and investigating incidents honestly, and acting on what we learn;
- maintaining the currency of qualifications, equipment and insurance that this work depends on; and
- reviewing this policy and the safety management system it heads at least every two years, or sooner when our operations change.

RESPONSIBILITY

The Managing Director is the officer of the PCBU and holds ultimate responsibility for health and safety, exercises due diligence under s.27 of the WHS Act, and is also — as the sole worker — responsible for carrying out every procedure in this system in person. When workers are engaged in future, this policy and the supporting system will be reviewed before they commence.

Straun Cameron

Managing Director, Diverse Routes Pty Ltd

ABN 14 674 723 829

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FITNESS FOR WORK POLICY

Document DR-WHS-POL-02 — fatigue, drugs & alcohol, medication and illness.

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PURPOSE AND SCOPE

Training delivery is safety-critical work: a trainer who is fatigued, impaired or unwell puts learners at risk. This policy sets the fitness standard Diverse Routes applies to its own personnel on every engagement, in addition to any client requirements that apply on site.

FATIGUE MANAGEMENT

- **The 14-hour rule:** a working day, including door-to-door travel, must not exceed 14 hours. Where a booking would exceed this, overnight accommodation is arranged in advance — this control is priced into our Schedule of Rates so it is never traded against cost on the day.
- A minimum 10-hour break is maintained between the end of one working day and the start of the next.
- Driving is planned with rest breaks at least every two hours; long approaches to remote sites are treated as non-training travel days rather than compressed into delivery days.
- Where a client's fatigue procedure is stricter, the client's procedure is followed on their sites.

DRUGS AND ALCOHOL

- Zero tolerance: no work is performed under the influence of alcohol or illicit drugs. Target BAC is 0.00 on any day involving training delivery, driving or plant operation.
- Diverse Routes personnel participate in client drug-and-alcohol testing regimes when required as a condition of site access, and accept the client's fitness determination on their site.
- Alcohol is never consumed during the working day, including at client social functions occurring within delivery engagements.

MEDICATION AND ILLNESS

- Prescription or over-the-counter medication that may cause drowsiness or impairment is assessed before the working day; where impairment is possible, the affected duties are not performed and the client is advised as early as possible.
- Illness that could compromise safe delivery, or that is communicable in a classroom setting, is grounds for rescheduling — early notice to the client always beats soldiering on.
- Pre-existing medical conditions relevant to high-risk work environments are declared through client medical or site-access processes where required.

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ENVIRONMENTAL POLICY

Document DR-WHS-POL-03 — practical environmental care, sized to what we actually do.

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OUR COMMITMENT

Diverse Routes teaches regenerative skills; running a wasteful business would make that hollow. Our environmental footprint is small — a vehicle, training consumables and client-site utilities — and we manage it deliberately:

- Training sites, venues and tracks are left as found or better; waste generated during delivery leaves with us if the host site has no suitable disposal.
- Fuels, gas cylinders and any training chemicals are stored, transported and used per their safety data sheets, with spill response sized to the quantities carried.
- Vehicle use is planned to minimise kilometres (consolidated bookings, efficient routing) — which the volume-booking structure of our Schedule of Rates actively encourages.
- Printed material is minimised in favour of digital delivery; equipment is repaired in preference to replacement — we teach toolmaking, after all.
- Environmental incidents (spills, damage) are reported and managed through the same incident process as safety events, including notification to the host site.

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SMS MANUAL

Document DR-WHS-MAN-01 — the working system, and the document clients review before engaging us.

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CONTENTS

1. Purpose and scope
2. Who we are
3. Legal framework
4. Responsibilities
5. How we operate on client sites
6. Risk management
7. Consultation and cooperation
8. Training, competency and currency
9. Plant, equipment and PPE
10. Hazardous chemicals
11. Fitness for work
12. Journey management
13. Incident management
14. Emergency preparedness
15. Insurance
16. Monitoring, audit and review
17. Document control
18. Client review cross-reference

1. PURPOSE AND SCOPE

This manual describes how Diverse Routes Pty Ltd manages work health and safety. It exists for two audiences: for us, it is the working system; for clients, it is the document you review before engaging us. It is written to be read — if a section leaves you with a question, ask: scameron@diverseroutes.com.au.

Scope of this version: training and assessment delivery, and all travel associated with it. Future business activities (guided 4WD tours) will be brought into scope by a dedicated module before they commence — they are not covered by v1.0.

2. WHO WE ARE

Diverse Routes Pty Ltd (ABN 14 674 723 829) is a specialist training business. Its sole director and, at the date of issue, sole worker is Straun Cameron — a trainer and assessor (Certificate IV TAE) with more than twenty years delivering high-consequence skills training. This shapes the whole system:

- The person accountable for the system is the person exposed to the risks and the person applying the controls. There is no gap between policy and practice to manage.
- Documents are sized for one competent professional, not a workforce. Where a conventional SMS element would be an empty ritual for a sole operator (e.g. an internal safety committee), this manual says so and states what we do instead.
- **Growth trigger:** before any worker or regular subcontractor is engaged (administrative support is anticipated), this system will be reviewed and the affected elements — consultation, induction, supervision, workers compensation — upgraded first.

3. LEGAL FRAMEWORK

We operate under the *Work Health and Safety Act 2011* (Qld) and the *Work Health and Safety Regulation 2011* (Qld), informed by Queensland codes of practice relevant to our delivery — including *How to Manage Work Health and Safety Risks*, *Managing the Risk of Falls at Workplaces*, *Confined Spaces*, and *First Aid in the Workplace*. Where we deliver under an RTO's registration, the Standards for RTOs and the RTO's own systems also apply to the training itself.

4. RESPONSIBILITIES

ROLE	HEALTH AND SAFETY RESPONSIBILITIES
Managing Director (officer, s.27 WHS Act)	Exercise due diligence: keep WHS knowledge current; understand operations and their risks; ensure resources and processes exist and are used; verify the system through the annual self-audit (s.16); review this system two-yearly and after any notifiable incident or scope change.
Trainer/assessor (worker, s.28)	Take reasonable care for self and others; comply with this system and the host site's; deliver within the documented SWMS; hold the stop-work obligation in s.6.4.
Clients and host PCBU's	Duties we rely on and consult about: venue safety, site inductions, emergency arrangements, site-specific hazard information, and (for RTOs) the training product and its resources. s.46 WHS Act requires us to consult, cooperate and coordinate — s.5 describes how we do it.
Students	Follow reasonable instruction while under training. Behavioural expectations and exclusion criteria (impairment, unsafe conduct) are set at course start.

5. HOW WE OPERATE ON CLIENT SITES

Most Diverse Routes work is delivered on clients' sites, under clients' safety management systems. This is our primary operating mode and we treat the client's system as controlling for everything site-related. The interface is explicit:

5.1 What we adopt from the host

- Site induction, access and sign-in requirements — completed before first delivery, refreshed as the site requires.
- Site emergency plans, muster points and first-aid arrangements (verified on arrival — see s.14).
- Permit-to-work systems, site PPE rules, and any site fatigue or drug-and-alcohol regime stricter than our own.

5.2 What always applies regardless of site

- Our fitness-for-work standards (DR-WHS-POL-02) including the 14-hour door-to-door limit.
- Our journey management controls (s.12).
- Our SWMS for high-risk training delivery (s.6.3) — followed alongside, not instead of, host procedures.

- Our incident notification obligations (s.13), including notifying the client without delay.
- The stop-work rule (s.6.4).

5.3 Conflict rule

Where host requirements and ours differ, the more protective requirement is followed. Where that is unclear or delivery cannot proceed under both, work pauses and the conflict is resolved with the client's site contact before continuing.

6. RISK MANAGEMENT

6.1 Process

Hazards are identified and risks assessed and controlled using the hierarchy of controls, at three levels: (1) **this system** — the standing risk register for our recurring delivery activities (controlled document DR-WHS-REG-02); (2) **per engagement** — a documented risk review during booking, covering site, venue, learner cohort, equipment and travel; (3) **on the day** — a pre-start check of venue, equipment and conditions before learners arrive, and dynamic reassessment whenever conditions change.

6.2 Risk matrix

LIKELIHOOD ↓ / CONSEQUENCE →	NEGLIGIBLE	MINOR	MODERATE	MAJOR	CATASTROPHIC
Almost certain	M	H	E	E	E
Likely	M	H	H	E	E
Possible	L	M	H	E	E
Unlikely	L	L	M	H	E
Rare	L	L	M	H	H

RATING	ACTION FOR A SOLE-OPERATOR BUSINESS
Low	Proceed with standard controls; note in pre-start record.
Medium	Proceed only with documented controls (SWMS or engagement risk review) in place.
High	Do not proceed as planned. Redesign the activity to reduce the rating; advise the client of the change and reasons.
Extreme	Do not proceed. No commercial consideration overrides this line.

6.3 Safe work method statements

Practical delivery of heights, confined space/breathing apparatus, live-fire extinguisher and vehicle-based training involves controlled exposure to real hazards — that exposure is the product, so its management is documented in dedicated SWMS (controlled documents DR-WHS-SWMS-01 to 04), reviewed with the host where the site adds hazards of its own.

6.4 Stop work

Any activity stops immediately if controls are compromised, conditions change beyond the assessment, or anyone present — trainer, student or host personnel — raises a safety concern that cannot be resolved on the spot. Delivery resumes only when the risk is back within the documented controls. A stopped course is a rescheduling conversation, never a negotiation about pressing on.

7. CONSULTATION AND COOPERATION

With one worker there is no internal consultation structure to administer — consultation here means outward: with **clients** at booking (scope, site hazards, cohort needs) and delivery (pre-start contact, post-course debrief); with **host sites** per s.5; with **students** at course start (emergency arrangements, behavioural expectations, right to raise concerns at any time) and via course evaluations; and with **industry** through the professional-currency activities in s.8. Records of engagement-level consultation live with the booking record. An internal HSC and HSR structure will be established if the workforce ever grows to require one (s.2 growth trigger).

8. TRAINING, COMPETENCY AND CURRENCY

- A current **training and competency matrix** (controlled document DR-WHS-REG-01) records qualifications, units of competency, licences and their currency status — including the vocational competency and industry currency evidence RTO clients require under the Standards for RTOs.

- Full USI transcript available to RTO clients on request; trainer profile and matrix supplied with any engagement proposal.
- We only deliver what we are competent and current in — where currency has lapsed (and it does happen: superseded units, expired tickets), the offering is withdrawn from sale until renewed. Our public course list is maintained on this basis.
- Professional development and industry currency activities are logged annually and feed the s.16 review.

9. PLANT, EQUIPMENT AND PPE

Diverse Routes maintains an **equipment register** (controlled document DR-WHS-REG-03) covering everything we bring to a job. Current inventory: vehicle, first aid kit, personal PPE, and rescue kit; training equipment is being progressively acquired and enters the register — with its inspection regime — before first use with learners.

- **Vehicle:** serviced to manufacturer schedule; pre-departure checks for remote travel; recovery and communications equipment carried per s.12.
- **Height safety and rescue equipment:** inspected before each use and formally every 6 months per AS/NZS 1891.4; anything with a defect, unknown history or expired inspection is withdrawn and tagged out of service.
- **First aid kit:** contents checked quarterly and after every use, sized to remote work per the First Aid Code of Practice.
- **Electrical equipment** used for delivery is tested and tagged per AS/NZS 3760 where required by host sites.
- **Client and host equipment:** where the client supplies training equipment (the standard arrangement in our Schedule of Rates), we verify inspection status before use with learners, and refuse gear that can't demonstrate it.

10. HAZARDOUS CHEMICALS

Our chemical footprint is small — vehicle fuels, gas cylinders for confined-space/BA training, and fire-training fuels. Each is carried in quantities appropriate to the exercise, stored and transported per its safety data sheet (SDS held with the equipment register), and used with spill and fire response sized to the quantity. Site chemical rules apply on host sites.

11. FITNESS FOR WORK

Covered by DR-WHS-POL-02 — Fitness for Work Policy: the 14-hour door-to-door limit, minimum 10-hour breaks, zero drug-and-alcohol tolerance, participation in client testing regimes, and medication and illness protocols.

12. JOURNEY MANAGEMENT

Driving is our highest-frequency risk exposure. Controls:

- Journeys planned with the 14-hour rule as a hard boundary; long approaches become non-training travel days.
- Rest breaks at least every two hours on drives over two hours.
- For regional and remote travel: itinerary shared with a nominated contact, check-in on arrival and at agreed intervals, and an escalation time after which the contact raises the alarm.
- Communications matched to the route — mobile, and satellite communicator where coverage is unreliable.
- No phone handling while driving; calls wait for stops.
- Fatigue, weather and daylight are rescheduling triggers, not variables to push through.

13. INCIDENT MANAGEMENT

1. **Respond:** make the area safe, provide first aid (DRSABCD), call emergency services if required.
2. **Notify the client/host without delay** — site contact first on client sites, then any client notification line, regardless of hour.
3. **Notifiable incidents** (death, serious injury/illness, dangerous incident per ss.35–37 WHS Act): notify Workplace Health and Safety Queensland immediately on 1300 362 128, and preserve the site until an inspector directs otherwise (s.39), except to help an injured person or make the site safe.
4. **Record** every incident, near miss and hazard on the incident report form (DR-WHS-FRM-02) within 24 hours.
5. **Investigate** proportionately to consequence and potential; identify causes, not blame — findings and corrective actions are recorded and tracked to closure.
6. **Learn:** corrective actions feed the risk register, SWMS and this manual at the s.16 review, or immediately where the finding warrants it.

Injuries to Diverse Routes personnel are additionally managed per the insurance arrangements in s.15; student injuries during delivery are jointly managed with the client/RTO, whose enrolment processes govern student personal information.

14. EMERGENCY PREPAREDNESS

We work on other people's sites, so emergency preparedness is mostly about interfacing well: on arrival at any venue we verify — before learners arrive — the emergency plan, exits, muster point, first-aid arrangements and how to summon site emergency response, and brief these to every course at start. Where the venue has no arrangements (greenfield or remote practical sites), our own are established: vehicle access for emergency services noted, first aid and communications positioned with the activity, and

an emergency plan point included in the SWMS pre-start. Fire extinguisher and gas equipment used in delivery is maintained per AS 1851 intervals.

15. INSURANCE

COVER	LIMIT	STATUS
Public liability	\$20,000,000 any one occurrence	Current — certificates of currency (with policy details) are controlled documents, available to clients on request.
Products liability	\$20,000,000 aggregate	
Professional indemnity	\$5,000,000 any one claim / \$10,000,000 aggregate	

As a company with no employees, workers compensation insurance is not currently required for the sole director; personal injury arrangements are private. This item is a named element of the s.2 growth trigger — engagement of any worker initiates a WorkCover Queensland policy before commencement.

16. MONITORING, AUDIT AND REVIEW

- **Every delivery:** pre-start check recorded; post-course debrief notes anything the system should learn.
- **Annually:** a documented self-audit against this manual and a representative contractor-prequalification checklist (the kind our clients use — see s.18), plus review of the year's incidents, near misses and stop-works. Findings become corrective actions with due dates.
- **Two-yearly:** full review of every document in the register (s.17), or earlier upon a notifiable incident, scope change, legislative change, or the s.2 growth trigger.
- Incident and hazard statistics are kept simple and honest: a running log reviewed at the annual audit — a sole operator gains nothing from inventing LTIFR dashboards, and clients reviewing this system deserve real records rather than theatre.

17. DOCUMENT CONTROL

The definitive version of every SMS document is the one published at diverseroutes.com.au — anything printed or downloaded is uncontrolled. Every document carries: document ID, version, approval, issue date, review date, and an amendment history. Documents are either **public** (this manual and the policies) or **controlled** (SWMS, forms, registers, insurance certificates — available to clients by invitation link, the same

mechanism as our quoting portal). The document register on the SMS home page lists status and current versions of everything.

18. CLIENT REVIEW CROSS-REFERENCE

Reviewing this system against your contractor prequalification checklist? This table maps the elements such checklists most commonly audit to where they live in our system.

TYPICAL AUDIT ELEMENT	WHERE IT LIVES
WHS policy, current within 2 years, communicated	DR-WHS-POL-01 (public; review date on document)
SMS maintained and reviewed ≤ 2-yearly	This manual s.16–17; review dates on every document
Environmental management	DR-WHS-POL-03; manual s.10
Worker access to the system	Published on the web — universally accessible (s.17)
Non-negotiable safety rules	14-hour rule (s.11–12), stop work (s.6.4), zero D&A (POL-02), Extreme-risk bar (s.6.2)
Subcontractor management	Not applicable — no subcontractors engaged; growth trigger at s.2
HS committee / HSRs	Not applicable at current size — consultation per s.7; growth trigger at s.2
Incident notification, incl. client ASAP 24/7	s.13 items 2–3; incident form DR-WHS-FRM-02
Hazard/near-miss reporting; investigation	s.13 items 4–6
Injury management / return to work	s.13, s.15 (no employees — see growth trigger)
Medical/pre-existing condition disclosure	POL-02 (medication and illness; client medical processes)
SWMS for high-risk work, monitored and reviewed	s.6.3; DR-WHS-SWMS-01–04 (controlled); reviewed per s.16
Risk register; housekeeping; review of controls	s.6.1; DR-WHS-REG-02 (controlled)
Plant register and pre-operation checks	s.9; DR-WHS-REG-03 (controlled)
Hazardous chemical register + SDS	s.10; SDS held with DR-WHS-REG-03

TYPICAL AUDIT ELEMENT	WHERE IT LIVES
Electrical test and tag	s.9 (AS/NZS 3760)
Working at heights equipment register; falls RAs	s.9 (AS/NZS 1891.4 regime); DR-WHS-SWMS-01
Pre-starts, toolbox, inspections, observations	s.16 (pre-start records; scaled to sole operator)
Statistics monitored; audits closed out	s.16 (incident log; annual self-audit with corrective actions)
Training matrix; licences; VOC; inductions	s.8; DR-WHS-REG-01 (controlled); site inductions s.5.1
Insurances	s.15; certificates controlled, on request

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