## NORTHERN PLUMBING Australia

# WHS Management Plan

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#### 1 PROJECT INFORMATION

#### 1.1 MANAGEMENT AND REVIEW

This Work Health & Safety Management Plan (WHSMP) has been developed to outline Northern Plumbing Australia approach to safely managing Construction Work at the

In accordance with Work Health & Safety Regulation 2011 – Section 309, Northern plumbing Australia shall:

make this plan available to all workers and contractors on this project and ensure they have the opportunity to read, understand, clarify and ask questions

keep a copy of the WHSMP readily available for the duration of the project

review this plan regularly throughout this project and make any revisions known to those working on the project

#### 1.2 NORTHERN PLUMBING AUSTRALIA DETAILS

Business name:	R J Edwards PTY LTD	
Address:	47 Thomas St Edgeworth	
Contact person:	Russell Edwards	
Work phone:	1300232300 / 0421384338	
Fax:		
Email:	info@northernplumbingaust.com.au	
ABN:	17135421242	
Contract number:		
Project Manager (name):		
signature:		

#### 1.3 DETAILS OF PERSONS AT WORKPLACE WITH WHS RESPONSIBILITIES

Name	Position	WHS responsibilities	Phone Number
	Project Officer / Manager	Person with Management Control (PWMC) of a workplace.	
		Consultation and implementation of this WHSMP with other PCBU duty holders	
		Statutory Notification of workplace incidents to the Regulator – Safework SA.	
		Records management	

WHS Officer (Practitioner / Advisor)	Implementation, maintenance and monitoring of project WHS requirements and activities.	
First Aid Officer	Access and provision of First Aid Administering First Aid	
Fire Warden	Assists in site emergency evacuations and first response activities	
Health & Safety Representative (HSR)	Employee workgroup safety representative	
Workgroup	Duty to communicate and coordinate safe work activities.	

#### 1.4 SCOPE OF WORK

Name of project:	
Address location of project:	
Project start date:	
Project target finish date:	

#### 2 ROLES AND RESPONSIBILITIES

#### 2.1 NORTHERN PLUMBING AUSTRALIA

Northern Plumbing Australia is responsible for:

As the **Principle Contractor** — is the person with management control (PWMC) of all project construction work activities at the worksite/workplace.

preparing, updating and implementing this WHSMP, including all associated procedures

identifying and observing all legal WHS requirements

ensuring that all works are conducted in a manner without risk to workers

planning to do all work safely

participating in the planning and design stages of work scope

identifying WHS training required for an activity

ensuring workers undertake identified WHS training

communicating and consulting with workers and subcontractors

making reasonable efforts to obtain, review and comment upon subcontractor risk assessments, training and SWMS prior to commencement of relevant works

investigating hazard reports and ensuring that corrective actions are undertaken

assisting in rehabilitation and return to work initiatives

dispute resolution

#### 2.2 CONTRACTORS / SUB CONTRACTORS

Contractors and sub-contractors who are engaged for this project are responsible for:

complying with any direction given to them by the principal contractor

fulfilling the duties of PCBU for their own operations

identifying all high risk construction work associated with their activities and ensuring safe work method statements are developed and implemented

complying with the duties as listed under 'Workers' (see 2.3)

following all safety policies and procedures and site rules

complying with this WHSMP

undertaking site-specific induction before starting work and signing off that they have completed this induction

ensuring the workers they engage undertake site specific induction before starting work and signing off that they have completed this induction

ensuring they have the correct tools and equipment and these are in a serviceable condition for the task

#### 2.3 WORKERS

All workers on this project, including those employed by contractors and sub-contractors, are responsible for:

taking reasonable care of their own health and safety taking reasonable care that their conduct does not adversely affect others complying with WHS instructions provided by the PWMC of the workplace complying with any notified WHS policies or procedures

#### 2.4 PERSONS WITH SPECIFIC WHS ROLES AND RESPONSIBILITIES

Name	Position	WHS responsibilities	Phone Number
	Project Officer / Manager	Represents Northern Plumbing Aust as the PCBU and Person with Management Control (PWMC) of the Project workplace.	
		Consultation and implementation of this WHSMP requirements with other PCBU duty holders at the workplace	
		Statutory Notification of workplace incidents to the Regulator – Safework SA.	
		WHSMP Records management	
	WHS Practitioner / Advisor	Implementation, maintenance and monitoring of project WHSMP requirements and activities.	
	First Aid Officer	Access and provision of First Aid	
	Fire Warden	Assists in site emergency evacuations and first response activities	
	Health & Safety Representative (HSR)	Employee workgroup safety representative. Duty to consult, provide information to workers and coordinate safe work activities.	
	Workgroup	Duty to communicate and coordinate safe work activities.	

#### 3 REFERENCED WHS INFORMATION

#### 3.1 LEGISLATION & COMPLIANCE

Relevant legislation	Tick if applicable
Work Health & Safety Act 2012 www.safework.nsw.gov.au	$\square$
Work Health & Safety Regulations 2012 www.safework.nsw.gov.a	V
Plumbing and draining code of practice www.fairtrading.nsw.gov.au	

#### 3.2 WHS CODES OF PRACTICE

Relevant Codes of Practice <sup>1</sup>	Tick if applicabl e
Abrasive blasting	
Confined spaces	
Demolition work	
Excavation work	
First aid in the workplace	
Hazardous manual tasks	
How to manage Work Health & Safety risks	
How to safely manage and control asbestos in the workplace	
How to safely remove asbestos	
Labelling of workplace hazardous chemicals	
Managing noise and preventing hearing loss at work	
Managing risks of plant in the workplace	
Managing risks of hazardous chemicals in the workplace	
Managing electrical risks at the workplace	

<sup>1</sup>Note that these are the Codes of Practice applicable in South Australia from January 1st 2013, available online at <a href="http://www.safework.nsw.gov.au/show\_page.jsp?">http://www.safework.nsw.gov.au/show\_page.jsp?</a> id=5892#.U2LV0vmSw7s . It is the responsibility of the Principal Contractor to be aware of the latest available Codes.

	Managing the risks of	falls in the workplace		
	Managing the work en	vironment and facilitie	s	
	Preparation of Safety Data Sheets for hazardous chemicals			
	Spray painting and powder coating			
	Welding processes			
	Traffic management in	workplaces		
	Work Health & Safety	consultation, coopera	tion and coordination	
	FORMER CODES OF	PRACTICE (STILL U	SEFUL REFERENCES)	
	Construction work			
	Safe design of structur	es		
	Standards or other guidance material			
	Plumbing and draining code of practice www.fairtrading.nsw.gov.au			
	NSW Standards for W	orkzone Traffic Mana	gement	
	Field Guide – traffic control devices for Workzone Traffic Management version 7 2012			
	AS3500 plumbing and draining			
3	WHS POLICY			
			thern Plumbing Aust are go S) Policy and Procedure Man	•
1	OTHER POLICIES			
5	INSURANCES REGISTER			
	Insurance type	Company	Policy number E	xpiry date
	WorkCover			
	Construc Insurance			
	Road Risk			
	Property Damage			
	Public Liability			

#### **4 RISK MANAGEMENT**

#### 4.1 IDENTIFYING HAZARDS AND MANAGING RISKS

*Northern Plumbing Aust* will systematically identify hazards or potential hazards, assess risks, and determine the control measures before the project starts by using the hierarchy of control (see 4.2) in conjunction with:

developing Safe Work Method Statements (SWMS) to identify hazards or potential hazards, and to implement control measures for high risk construction work

using IMS risk assessment and job safety analysis form to control general construction work hazard risks

Hazard risks identified by a designer must be reported in accordance with Safety in Design responsibilities (Section 295 of WHS Regulation 2012)

Northern Plumbing Aust shall also review risks:

When control measures no longer effectively control the risks they were intended to

when changes are made for work tasks, procedures, equipment or chemicals

before purchasing hazardous chemicals intended for use at the workplace

when introducing a new work task, plant or equipment

All hazards that are identified throughout the project must be reported immediately to Northern Plumbing Aust who will inform workers of the risk management procedures and control measures.

#### 4.2 HIERARCHY OF CONTROL

Northern Plumbing Aust will control all identified hazard risks by applying the WHS Hierarchy of Controls as illustrated in the diagram below. So far as reasonably practicable, Northern Plumbing Aust will implement risk control measures that are highest in the order, and will implement multiple controls where necessary.

#### 5 HIGH RISK CONSTRUCTION WORK

#### 5.1 HIGH RISK CONSTRUCTION WORK

The following register of high risk activities have been identified for this project. Safe Work Method Statements (SWMS) have been developed for each of the high risk construction work activities. *Northern Plumbing Aust* will also develop SWMS for any additional high risk work that is introduced or identified during the project.

Description of High risk construction work activity (delete works that are not applicable to this Construction Project	SWMS developed and attached
Risk of falls from greater than 2 meters	
Work on a telecommunications tower	
Demolition of load-bearing structure	
Likely to involve disturbing asbestos	
Temporary load-bearing support structures	
Work in confined spaces	
Work in or near shaft/trench with an excavated depth greater than 1.5m or a in tunnel	
Work involving use of explosives	
Work on or near pressurised gas pipes or mains	
Work on or near chemical, fuel or refrigerant lines	
Work on or near energised electrical installations or services	
Work in an area with contaminated or flammable atmosphere	
Work with tilt up or pre-cast concrete	
Work on, in or adjacent to road, rail shipping or other major traffic corridor	
Work in an area with movement of powered mobile plant	
Work in or areas with artificial extremes of temperature	
Work in or near a drowning risk	
Diving work	

Completed SWMS shall be collected and recorded in duplicate by *Northern Plumbing Aust*. One copy shall be kept on file in the Project File in *Northern Plumbing Aust* office. The other copy shall be the "live" document, kept on site in the Supervisor's Folder for review and editing in the event of changed conditions.

Northern Plumbing Aust will review the SWMS when:

- there is a need to change the method of carrying out of the high risk construction work
- a risk has been identified that is not included and managed within a SWMS.

#### 5.2 LICENSES FOR HIGH RISK WORK

Workers are required to be licensed to undertake high risk work. Common examples include rigging, dogging, crane and forklift operation.

Northern Plumbing Aust maintains a register of employee qualifications and expiry dates in IMS Employee Training and Licenses Matrix to ensure suitable resources are selected to complete high risk tasks.

#### 5.3 ASBESTOS

Northern Plumbing Aust does not handle or remove asbestos, and shall delegate this work to a qualified sub-contractor if asbestos disposal is included in project scope. Northern Plumbing Aust may otherwise identify asbestos that was buries or hidden, and accordingly will ensure:

Only a licensed asbestos removalist is used to remove asbestos

workers understand the procedures for asbestos identification, notification and removal

personal protective equipment for asbestos work, removal or potential asbestos exposure is provided

correct signage and controls are in place before any asbestos work or removal commences Asbestos is removed safely and disposed of correctly.

#### 6 EMERGENCY & INCIDENT RESPONSE

#### 6.1 EMERGENCY PREPAREDNESS

To ensure *Northern Plumbing Aust* are prepared for an emergency, *Northern Plumbing Aust* will:

show all workers and subcontractors the emergency evacuation assembly area as part of their site based safety induction (this is included in our induction checklist)

display emergency procedures in the site office or other visible location

check and mark fire extinguishers at the beginning of the project and six-monthly after that

#### **Emergency procedure**

In the event of a fire or similar incident requiring emergency evacuation:

Stop work immediately, evacuate from the workplace and proceed to the assembly point.

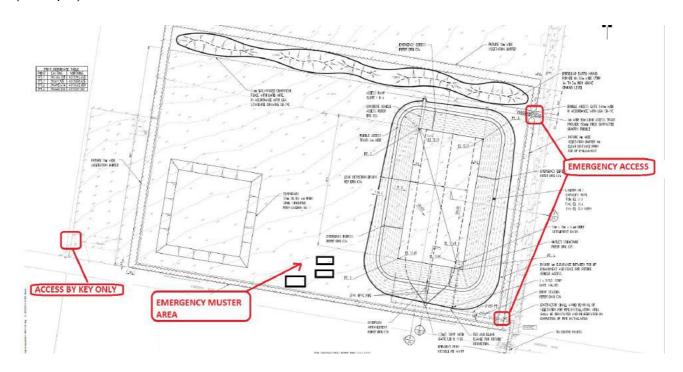
notify a Northern Plumbing Aust person with WHS responsibilities

Call emergency services on 000. Other emergency contact numbers are on display in the site office

assemble in the nominated assembly points until you receive further instructions from site supervisor or emergency services personnel

#### **Emergency assembly point**

Our emergency meeting point is <INSERT EMERGENCY ASSMBLEY POINT BELOW>. (Example)



#### **Emergency contact list**

The emergency contact list is displayed in the site office and lunch room.

Also see items 2.4 and 1.3 in this Plan.

#### 6.2 INCIDENT PROCEDURES

If an incident involving the health and safety of a worker(s) occurs at the workplace;

immediately notify the WHS Officer for Northern Plumbing Aust

preserve and do NOT interfere with the scene of the incident

Northern plumbing Aust will determine the nature and severity of the injury, and notify SAFEWORK NSW if required (see 6.3).

The principal contractor may record details of the incident and will ensure any remedial or corrective action is undertaken.

#### 6.3 NOTIFIABLE INCIDENTS

Northern Plumbing Aust will notify the following prescribed incidents to SAFEWORK NSW:

workplace death

serious injury or illness

a dangerous occurrence

As the PWMC of the Project site, Northern Plumbing Aust will be the single source of Notification to SAFEWORK NSW.

#### 6.4 FIRST AID

*Northern Plumbing Aust* will supply adequate first aid equipment, which is available in the following locations:

- Workplace First Aid Kits in supervisor's vehicle and at site office.
- Personal First Aid Kits in all operator Plant Machinery.

First aid should be administered by trained first aid personnel (see item 1.3). In the event of a person being injured, trained first aid personnel should:

stabilise the person and administer first aid

phone an ambulance on 000 or 112 from a mobile phone (depending on the extent of the injuries)

if emergency services are called, notify Northern Plumbing Aust site office immediately. In all other circumstances notify principle contractor as soon as practicable.

#### 6.5 WORKER INDUCTION

As part of the induction form and discussions, the Project WHS Plan shall be referenced and made available to all employees at all times in the site office.

*Northern Plumbing Aust* will work with other contractors to ensure a site specific induction is provided for all workers before starting work.

This induction must outline:

the expectations outlined in this WHSMP, including all relevant policies and procedures

the emergency evacuation assembly point

the site rules

the facilities

site hazards

high risk construction work activities

verify construction industry White Card

These induction requirements shall be met by the Project Manager or Supervisor ensuring that all personnel review, discuss and sign the:

- Northern Plumbing Aust Site induction form
- Northern Plumbing Aust Job specific JSA and SWMS documents

#### 6.6 WORKER TRAINING

Northern Plumbing Aust will:

verify workers are trained and competent for the work to be carried out

verify workers are trained to identify with any risks associated with the work and understand the control measures in place

ensure on-site training and supervision is provided

organise external training for specific tasks where required

verify high risk Licenses for all high risk work and maintain a register of Licenses. Northern Plumbing Aust IMS *Employee Training and Licenses Matrix* shall be used to allow management to select appropriately licensed workers for high risk tasks.

consult with other contractors to ensure their workers are appropriately trained and competent.

#### 7 CONSULTATION AND COMMUNICATION

#### 7.1 CONSULTATION

Northern Plumbing Aust will consult with all workers, contractors and site suppliers on relevant WHS issues for this project:

prior to the commencement of any work activity

at toolbox meetings where anyone can raise issues for discussion

informally during the planning of activities or the development of Safe Work Method Statements

when changes to workplace hazards, risks or control measures could affect the health and safety of workers

consult on any matters relating to a workplace incident

#### 7.2 COMMUNICATION

Northern Plumbing Aust will ensure our workers and other contractors are made aware of WHS requirements by providing them with this WHS Management Plan before starting work on the project. Contractors are expected to make their workers aware of all WHS requirements.

Northern Plumbing Aust will communicate relevant WHS information to everyone involved in this project by any of the following methods:

Site inductions

this work health safety management plan

informal pre-start discussions

Safe work method statements

weekly toolbox meetings

notification of incident reports and outcomes

provision of safety alerts or relevant guidance material about industry or site specific hazards/incidents

#### 8 SITE SAFETY PROCEDURES

#### 8.1 SITE RULES

A copy of the site rules is displayed in the site office

- Enter and exit the site in a safe manner
- Complete all required paper work (e.g. Permits & SWMS)
- Follow all Site Safety rules in regards to behavior and site PPE
- Only undertake work that you are licensed, competent and trained for.
- Complete work tasks in accordance with the WHS Regulations and the codes of practice
- Be aware of nearby works being carried out, such as; operating plant, working at height, falling objects, overhead and underground power lines and essential services, chemicals and electrical work.
- Keep yourself and co-workers safe at all times
- Follow traffic guidelines
- Sign in and out on each daily visit

Northern Plumbing Aust policies and procedures for workers conduct in regards to site housekeeping, conduct, inclement weather, drugs & alcohol, etc, can be found in Northern Plumbing Aust IMS Procedure Manual.

#### 8.2 FACILITIES

Drinking water will be provided on site.

Wash up and toilets will be provided

All workers are to have good hygiene standards and clean up after themselves.

A sheltered lunch room with amenities will be provided.

#### 8.3 SECURITY

shall, so far as reasonably practicable, secure the site from

unauthorized access by:

erecting barrier mesh or temporary fence to prevent unauthorised access

locking gates (if applicable) to the site outside normal hours of operation

keeping plant, powered equipment isolated during the project.

storing SCS&C equipment/tools, and materials in the site container or compound

Contractors are responsible for the security of their own plant, equipment and materials. A site security container share arrangement may be possible – subject to availability.

#### 8.4 SIGNAGE

as the principal contractor for this construction project, will install and display the following signs on the entrance to the site:

Principles' identification (name), telephone contact details and after-hours contact telephone number

The location of the site office for the project.

All signage will be clearly visible from outside the site where the construction project is being undertaken.

#### 8.5 PERSONAL PROTECTIVE EQUIPMENT

Northern Plumbing Aust will provide their own employee and direct labor hire workers with appropriate protective equipment (PPE) for use at the workplace. Contractors / subcontractors are required to provide their own PPE in accordance with any specified site PPE requirements.

The person providing the PPE must ensure that the PPE is:

suitable as an effective control measure for the nature of the hazard

a suitable size and fit

maintained, repaired or replaced so that it continues to protect the worker who uses it, including by:

ensuring it is clean and hygienic

ensuring it is in good working order

ensuring it is used or worn by the worker, so far as is reasonably practicable.

The person supplying the PPE must also:

provide workers with information, training and instruction in the proper use, wear, storage and maintenance of PPE

ensure that any other person at the workplace (such as home owners, site visitors, clients or inspectors) is provided and wears the appropriate PPE.

Workers must:

follow all instructions to wear and use PPE

take reasonable care of PPE

report any damages of PPE

report if the PPE becomes ineffective for the work being carried out

#### 8.6 FALLS

Northern Plumbing Aust will manage the risk of fall by:

ensuring that where practicable, any work involving the risk of a fall is undertaken on the ground or on a solid construction

where this is not practicable, providing fall prevention device/s such as secure fencing, edge protection, working platforms and/or covers

where this is not reasonably practicable, providing a work positioning system such as plant or a structure, such as an elevated work platform that enables a person to be positioned and safely supported,

where this is not practicable, providing a fall arrest system such as a safety harness system. Workers will be trained in emergency procedures for fall arrest systems

When undertaking work involving the risk of a fall from height, workers must:

follow all instructions

work with a buddy when using a ladder

only use approved work platforms and safety systems and equipment

#### 8.7 FALLING OBJECTS

Where there is a risk of an object faking more than 4.0 meters, Northern Plumbing Aust will implement adequate protection against the risk of falling objects through the use of control measures such as barrier screen, toe-boards, nets, and by storing and stacking materials safely.

#### 8.8 DEMOLITION WORK

may undertake demolition work for this project.

 will submit a demolition work notification form to Safe Work NSW to meet our requirement to notify Safe Work NSW at least five days before the demolition work commences.

#### 8.9 EXCAVATION / TRENCHING WORK

Undertaking excavation work must not commence until Northern Plumbing Aust have verification that the following have been completed:

Telephone 'Dial before you dig', to identify known underground essential services.

Carry out onsite underground services location by a competent person, or engage specialist to complete the identification.

Consultation and communication is effectively carried out to ensure implementation of the determined control measures.

Identify, delineate, mark, as may be determined to manually expose the existing essential services and other services before any mechanical excavation is carried out near the services

Trenches that are proposed to be more than 1.5 meters deep must be secured from unauthorised access and entry.

Trenches that are proposed to be more than 1.5 meters deep must be supported to prevent collapse, Controls may include; Shoring, benching, battering. Otherwise, written advice from a geotechnical engineer must be obtained to verify the trench is safe from collapse.

Safe Work Method Statements (SWMS) are included in this WHS plan for trenches of at least 1.5 meters. Workers must be familiar with and implement the control measures in the SWMS.

#### 8.10 ELECTRICITY - OVERHEAD AND UNDERGROUND ELECTRIC LINES

Northern Plumbing Aust will ensure, where reasonably practical, that that no-one works within an unsafe distance of an overhead or underground electric line.

If maintaining a safe distance is not reasonably practical, Northern Plumbing Aust will:

Require that a risk assessment id conducted in relation to the proposed work.

Identify hazards and implement risk control measures consistent with the risk assessment and the requirements of the Authority (SA Power Networks)

FOR WORK NEAR OVERHEAD POWER LINES UP TO AND INCLUDING 132,000KV:

work is not permitted within 3 meters of overhead power lines

Northern Plumbing Aust (or contractor in charge of the work) must have written authority from the electrical supply authority to work within the "no go" (exclusion) zone

FOR WORK NEAR OVERHEAD POWER LINES OF GREATER THAN 133KV:

work is not permitted within 8 meters of overhead power lines

Northern Plumbing Aust (or contractor in charge of the work) must have written authority from the electrical supply authority to work within the "no go" (exclusion) zone

#### FOR EXCAVATION WORK NEAR UNDERGROUND ESSENTIAL SERVICES:

take all reasonable steps to obtain current underground essential services information before directing or allowing the excavation work to start

provide this information to any person engaged to carry out the excavation work

#### 8.11 ELECTRICAL WORK - ELECTRICAL EQUIPMENT AND INSTALLATIONS

All electrical power supplied to the site must be transmitted through an electrical circuit isolation control. All electrical equipment and work must comply with the requirements of AS/NZ 3012:2010 (electrical installations—construction and demolition sites).

Switchboards and distribution boards used on site must:

- be of robust construction and materials capable of withstanding damage from the Weather and other environmental and site influences (IP23 minimum rating)
- be securely attached to a post, pole, wall or other structure unless it is of a stable freestanding design able to withstand external forces likely to be present
- incorporate suitable support and protection for flexible cords and cables and prevent mechanical strain to the cable connections inside the board
- protect all live parts at all times

be individually identified by numbers, letters or a combination of both (where multiple boards are present).

Workers must maintain, routinely inspect, and report any damaged electrical equipment. It will be removed from service and either repaired or replaced and subsequently inspected and tested as required.

#### 8.12 PORTABLE ELECTRICAL TOOLS

Northern Plumbing Aust will manage hazards of hand operated and power tool use by:

regularly checking all tools to ensure they are in a safe working order

recording all electrical tools in a testing and tagging register

testing and tagging electrical tools every 3 months

reporting hazards identified with power tools to workers through a toolbox meeting.

Before using electrical tools, workers must ensure:

Electrical power cords used on construction sites must be rated heavy duty and be connected to an RCD device.

inspection to identify any damage or hazard

electrical connections are secure

electricity supply is through an RCD

safeguarding features are operative and in position

the machine is switched off before activating the electricity supply

appropriate PPE is used as required by manufacturer's guidelines or as guided by Northern Plumbing Aust

Workers must report any issues with power tools to Northern Plumbing Aust . Unsafe tools

#### 8.13 PLANT

Northern Plumbing Aust will ensure that:

all plant is regularly maintained, inspected and tested by a relevant competent person only use plant for the purpose for which it was designed

use all safe guarding features and warning devices on plant

follow all information, training and instruction provided

guarding must be permanently fixed and is not permitted to be removed

No person other than the operator may ride on the plant unless licensed to do so.

#### 8.14 SCAFFOLDS

Northern Plumbing Aust will ensure:

that the scaffold is erected by a competent person (having regard for high risk work license)

for risk of a fall of more than 4 meters, a written confirmation is required to be provided by a competent person who has inspected the scaffold, informing that construction of the scaffold has been completed.

unauthorised access to the scaffold is prevented while the scaffold is incomplete or unattended

that scaffolding and its supporting structure is inspected by a competent person at least every 30 days.

safeguarding features are operative and in position

the machine is switched off before activating the electricity supply

appropriate PPE is used as required by manufacturer's guidelines or as guided by Northern Plumbing Aust

Workers must report any issues with power tools to Northern Plumbing Aust . Unsafe tools will be tagged and removed from service

#### 9 SAFE WORK METHOD STATEMENTS (SWMS)

The carrying out of high risk construction work must, before high risk construction work commences, ensure that a safe work method statement for the proposed work is prepared.

#### A SWMS must:

- · identify the work that is high risk construction work; and
- specify hazards relating to the high risk construction work and risks to health and safety associated with those hazards; and
- describe the measures to be implemented to control the risks; and describe how the control measures are to be implemented, monitored and reviewed.
- be prepared taking into account all relevant matters including circumstances at the
  workplace that may affect the way in which the high risk construction work is carried out,
  and be set out and expressed in a way that is readily accessible and understandable to
  persons who use it.