

# Guidelines for a Successful Manual Audit (MA) Submission

## What is a Manual Audit?

A Manual Audit (MA) is a comprehensive review of your company's written safety manual, policies, procedures, and/or safe work practices. The intent of the MA is to ensure your company has established effective processes to protect your employees from reasonably foreseeable harm in accordance with jurisdictional safety requirements and industry-best practices.

To be considered compliant with a client's requirements, each supplier must successfully complete a MA.

The scope of the MA encompasses the entirety of your company's operations, extending beyond a single client. To streamline processes and reduce the need for repetitive MA's each time a new project is initiated with either an existing or new client, Avetta undertakes a comprehensive review that covers the company's complete spectrum of work, activities, and services. Documents submitted for the Avetta MA must not be client-, project-, or site-specific. Client-specific documents may be requested directly by the client at the site.

## MA Document Conformance Requirements

Before making a submission, please ensure each document uploaded against the MA task complies with the following requirements:

- Document must be dated within the past three years as of today's date.
- The revision date must be included within the document submitted: front page, document revision section and/or footer. Revision date cannot be in the future.
- Document must be on company letterhead, matching the company name listed on the Avetta account.
- Document must be a final version (no template/draft marks).
- Document must be in Word or PDF format.
- SWMS must not reference client/project specific information.
- Document must include current and up to date Australian legislative references.

**Note:** Avetta cannot provide templates – Auditors can provide guidance and direct suppliers to the regulator for advice.

- All Australian suppliers must address the Psychosocial Safety and Fatigue/Injury Management (RRTW) components of the MA.
- Suppliers engaging electricians must address the Electrical (Qualified) and Arc Flash Safety component of the MA.
- The full audit form must be addressed, and files must be linked to each category.
- All Australia Suppliers linked to mining clients must provide a generic overarching Safety Management Plan.
- All PCBU's notwithstanding the company size have legal duties under the WHS Act to provide and maintain safe systems of work. If formal procedures are not established, submit a dated and signed statement on company letterhead explaining how you address each open requirement, or any other document that allows to understand how the company mitigates its risks. This helps Avetta gather evidence to confirm the presence of safe systems of work on behalf of the client. Please only upload generic documents, **NOT** client/project/site specific.

## What is the Process?

1. This MA is performed based on the supplier safety evaluation completed at the time of registration.
2. Suppliers initiate the MA task by completing a pre-questionnaire that includes work type identification and documentation collection.
3. Once submitted, an Auditor will review the documentation provided to ensure it meets the requirements.
4. If gaps are identified, the audit will be returned to the supplier, and they will be prompted to upload additional documentation to meet the Open Requirements.

**Note:** This process can continue as many times as needed until your company is compliant

5. Once all requirements have been addressed the MA will be marked complete.

**Note:** The MA re-audit is every 3 years.

## What if an MA Requirement Is Not Applicable to My Company?

If a category or question is not applicable, you may upload a clarification letter that includes company name, date, not applicable category or questions, reason for non-applicability, and leadership acknowledgement (signature or name of a person of authority within the company).

Auditors will accept a comment within the MA form in the Comments function available at every question level an explanation from the supplier advising the Reason for Non-Applicability in lieu of a company dated and signed letter. The supplier must provide a reason for not applicable. N/A is not a sufficient reason.

*e.g. Company xx do not perform this work as part of the full scope of works therefore not exposed to this risk....*

## Manual Audit Overview Webinar for Supplier Administrators

Watch the Avetta Supplier User Manual Audit Overview webinar for additional tips and insights.

[Manual Audit Overview for Supplier Administrators On-Demand Webinar](#)

### Who Can I Call For Assistance With My Manual Audit?

If you have not been assigned an auditor or have general questions about the Manual Audit, please contact [APACsupport@avetta.com](mailto:APACsupport@avetta.com) and/or 1800 502 142. For more information regarding the MA task contact [APACaudits@avetta.com](mailto:APACaudits@avetta.com) quoting the MA case number.

**Note:** Avetta can only discuss the Manual Audit with individuals who are listed on the account.



## Addressing Open Requirements

Completing an Avetta MA is vital for compliance and showcasing dedication to your client's safety standards. Your written safety procedures reflect how your company plans to operate safely. If a key aspect is missing, Auditors note it as an Open Requirement. An Open Requirement is an Auditor's signal that your Safety Manual needs attention.

It's common to encounter Open Requirements during the audit process. Swiftly addressing these is key to successfully completing the Audit. Rejections may also happen at the start of the MA when the submitted documentation doesn't meet the minimum criteria outlined in the 'Upload your Safety & Health Program' file requirements. This feedback is constructive, helping you pinpoint improvements, fortify documentation, and better meet compliance with industry standards and regulations.

Upon receiving an Open Requirement, the Supplier contact on record is notified by email, and the MA task indicates the need for further action. When the Supplier reviews the task and selects "Resume Task," they can access detailed rejection information, including standardised comments and specific Auditor feedback. These reasons may include:

### 1 Document Not Found:

- **Situation:** Incorrect or missing document.
- **Guidance:** Ensure the correct document is uploaded or provide the appropriate document.

### 2 Incorrect Company Name:

- **Situation:** Document company name doesn't match the account's name, DBA, Subsidiary, or Parent Company.
- **Guidance:** Confirm the company name in the document matches the name(s) in your account. If there have been recent changes to your company name or DBA, please notify Avetta. Otherwise, upload a new or revised document reflecting the company name as indicated in your Avetta account..

### 3 Incorrect Document Formatting:

- **Situation:** Document is not in PDF or Word format or contains external links.
- **Guidance:** Ensure the document is self-contained, in PDF or Word format, and without external links.

### 4 Not a Comprehensive Program:

- **Situation:** Document lacks comprehensive information about the Supplier or doesn't meet criteria.
- **Guidance:** Ensure the document covers applicable categories and doesn't include irrelevant content.

### 5 Not a Final Version:

- **Situation:** Document shows tracked changes or isn't a final version.
- **Guidance:** Submit a final version without editing marks or notes.

### 6 Review/Revision Date:

- **Situation:** Document lacks a current review/revision date.
- **Guidance:** Ensure the document is up to date, with a date less than 3 years old.

### 7 Requirement Not Met:

- **Situation:** Submitted documentation doesn't comply with Audit requirements or regulations
- **Guidance:** Review the document, align it with the Audit question and jurisdictional requirements. If necessary, upload a new or revised document.

Prior to uploading any documents for review, please ensure they meet the minimum file requirements outlined below:

- **Comprehensive:** The documentation should provide a complete representation of your safety procedures, policies, and practices specific to your company.
- **Current:** Documents must reflect the most recent safety standards and regulatory requirements, with a review or revision date within the past 3 years.
- **PDF or Word Format:** Acceptable formats are PDF or Word for compatibility and accessibility. External links are not accepted.
- **Holistic:** Documentation should be relevant to your entire organization, avoiding client, project, or site-specific details.
- **Final Version:** The document should be free of editing marks, tracked changes, annotations, or ongoing revision indicators.

In addition to the standardised comments above, the Auditor offers specific feedback to help you understand and address the open requirement(s). Review both types of comments for insights into why there are Open Requirements.

Suppliers can also interact with their Auditor by using the comment feature provided with each topic. Suppliers may use the comment field to request exemptions or ask for clarification on a topic.

## Reviewing Open Requirements

Understand the specifics of the Open Requirement by carefully reviewing detailed feedback provided by the Auditor. This step is crucial for successfully completing your MA. Open Requirements signify that criteria has not been met and additional details are needed to meet compliance. These act as audit checkpoints to ensure documents meet necessary standards. After reviewing your Open Requirements, pinpoint the difference between your current documentation and the audit topic. Identify any missing elements, create a checklist, and consider printing the Audit for effective team collaboration.

## Updating, Uploading, and Resubmitting Documentation

Address Open Requirements by submitting additional documentation. This may involve adding, revising, or updating programs to provide detailed information in relevant audit categories. Ensure clarity, conciseness, and comprehensive coverage aligned with applicable Audit criteria. After updates, thoroughly review the documentation to address all relevant audit categories and questions. Confirm there are no remaining open requirements.

If a question requires additional documentation, you can upload a file and associate it with the corresponding topic or question under review. After ensuring all open requirements are addressed in the new documentation, click “Resubmit” for Avetta’s review. Please allow five business days for the documents to be reviewed, and you’ll receive an automated confirmation email.

**Note:** If the file is the wrong format, larger than 500MB, or more than 10 files are uploaded, a red warning message will show, and you will need to remove that file and upload another.

## What if an Open Requirement Isn’t Applicable?

If an Open Requirement isn’t applicable, mark the Manual Audit category as Not Applicable by confirming that the exposure or hazard is irrelevant to your scope of services.

## Remain Proactive

Stay proactive with safety. Regularly review and update documentation, even between Audits, to ensure continuous compliance. This not only showcases your dedication to safety excellence but also strengthens Client relationships. By fostering a proactive safety culture, you’ll navigate Audits with confidence, ensuring a smooth and successful process.

## WHS Resources for Australian Suppliers

Model Codes of Practice are practical guides to achieving the standards of health and safety required under the model WHS Act and Regulations. To have legal effect in a jurisdiction, a model Code of Practice must be approved as a code of practice there. To determine if a model Code of Practice has been approved in a particular jurisdiction, check with your [local WHS regulator](#). An approved code of practice applies to anyone who has a duty of care in the circumstances described in the code. In most cases, following an approved code of practice would achieve compliance with the manual audit.

Like regulations, codes of practice deal with particular issues and do not cover all [hazards](#) or [risks](#) that may arise. Health and safety duties require you to consider all risks associated with work, not only those risks that regulations and codes of practice exist for. While approved codes of practice are not law, they are admissible in court proceedings. Courts may regard an approved code of practice as evidence of what is known about a hazard, risk, or control and may rely on the relevant code to determine what is reasonably practicable in the circumstances.

As well as codes of practice, [Safe Work Australia](#) has [guidance material](#) that can also help you achieve these standards under WHS law and successfully complete your MA. Below are some specific topics:

- [Abrasive blasting](#)
- [Confined spaces](#)
- [Construction work](#)
- [Demolition work](#)
- [Excavation work](#)
- [First aid in the workplace](#)
- [Hazardous manual tasks](#)
- [How to manage and control asbestos in the workplace](#)
- [How to manage work health and safety risks](#)
- [How to safely remove asbestos](#)
- [Labelling of workplace hazardous chemicals](#)
- [Managing electrical risks in the workplace](#)
- [Managing noise and preventing hearing loss at work](#)
- [Managing psychosocial hazards at work](#)
- [Managing risks in stevedoring](#)
- [Managing risks of hazardous chemicals in the workplace](#)
- [Managing risks of plant in the workplace](#)
- [Managing the risk of falls at workplaces](#)
- [Managing the risk of falls in housing construction](#)
- [Managing the risks of respirable crystalline silica from engineered stone in the workplace](#)
- [Managing the work environment and facilities](#)
- [Preparation of safety data sheets for hazardous chemicals](#)
- [Safe design of structures](#)
- [Spray painting and powder coating](#)
- [Tower cranes](#)
- [Welding processes](#)
- [Work health and safety consultation, cooperation and coordination](#)

## Heavy Vehicle National Law and Regulations

The National Heavy Vehicle Regulator (NHVR) administers one set of laws for heavy vehicles over 4.5 tonnes gross vehicle mass. This set of laws consists of the Heavy Vehicle National Law (HVNL)\* and five sets of regulations. The HVNL commenced on 10 February 2014 in the Australian Capital Territory, New South Wales, Queensland, South Australia, Tasmania and Victoria. Each of them passed a law that either adopts or duplicates the HVNL (with some modifications).

Although the HVNL has not commenced in Western Australia or the Northern Territory at this time, the HVNL applies equally to vehicles from those jurisdictions when they cross into one of the states or territories where the HVNL applies. In some cases, drivers may also need to comply with certain aspects of the HVNL before they cross the border (e.g.: [Work Diary Requirements](#)).

\*The HVNL is the schedule to the Heavy Vehicle National Law Act 2012 (Qld).

- [Heavy Vehicle \(Fatigue Management\) National Regulation](#)
- [Heavy Vehicle \(General\) National Regulation](#)
- [Heavy Vehicle \(Mass, Dimension and Loading\) National Regulation](#)
- [Heavy Vehicle \(Registration\) National Regulation](#)
- [Heavy Vehicle \(Vehicle Standards\) National Regulation](#)

Each state and territory covered by the HVNL has passed legislation that modifies some aspects of the HVNL for that state or territory.

JURISDICTION	ACT	REGULATIONS
ACT	<a href="#">Heavy Vehicle National Law (ACT) Act 2013</a>	N/A
NSW	<a href="#">Heavy Vehicle (Adoption of National Law) Act 2013</a>	<a href="#">Heavy Vehicle (Adoption of National Law) Regulation 2013</a>
Queensland	<a href="#">Heavy Vehicle National Law Act 2012</a>	<a href="#">Heavy Vehicle National Law Regulation 2014</a>
South Australia	<a href="#">Heavy Vehicle National Law (South Australia) Act 2013</a>	<a href="#">Heavy Vehicle National Law (South Australia) (Expiation Fees) Regulations 2013</a>
Tasmania	<a href="#">Heavy Vehicle National Law (Tasmania) Act 2013</a>	<a href="#">Heavy Vehicle National Law (Tasmania) Regulations 2014</a>
Victoria	<a href="#">Heavy Vehicle National Law Application Act 2013</a>	<a href="#">Heavy Vehicle National Law Application (Infringements) Regulations 2013</a>

#### Electrical Arc Flash

- [AEC – Electrical Arc Flash Hazard Management Guide](#)
- [OHS Body of Knowledge – Chapter 23.2: Electrical Appendix](#)
- [DMIRS WA – Electrical Arc Flash Hazard Awareness Audit Guide](#)
- [Energy Safe VIC – Arc Flash Hazard Management](#)

#### Emergency Management

- [OHS Body of Knowledge – Chapter 36: Emergency Management](#)

#### Ionising Radiation

- [OHS Body of Knowledge – Chapter 24: Ionising Radiation](#)

#### Non-Ionising Radiation

- [OHS Body of Knowledge – Chapter 25: Non-Ionising Radiation \(Electromagnetic\)](#)