

Health Monitoring Procedure

Purpose	<p>This procedure describes how to meet the health monitoring requirements of the TfNSW Health and Occupational Hygiene Standard.</p> <p>The purpose of this procedure is to provide a framework that enables the effective implementation and management of health monitoring. This procedure outlines the circumstances in which health monitoring should be considered and provides information to assist the user to determine the frequency of health monitoring, assess the results, and determine the circumstances in which corrective actions need to be taken.</p> <p>This procedure is intended to be used by health and safety resources and line management.</p>
Scope	<p>This procedure applies to all hazardous substances that may be absorbed by ingestion, inhalation or through the skin or mucous membranes as well as physical hazards such as noise and vibration. The scope does not include fitness for work health assessments, or drug and alcohol screening.</p> <p>Applies to all TfNSW divisions, where workers' exposure to identified health hazards presents a significant risk to health.</p> <p>This procedure does not apply to:</p> <ul style="list-style-type: none">• Sydney Metro• Sydney Trains• NSW Trainlink
Required outcomes	<ol style="list-style-type: none">1. Ensure compliance with the New South Wales (NSW) Work Health and Safety (WHS) legislation.2. Monitor and identify changes in a worker's health status due to exposures to occupational health hazards.3. May identify non-occupational illness among workers.4. Capture potential onset of disease at its early stages.5. Outline provisions for monitoring and managing corrective actions.

1 Context

Health monitoring is the monitoring of a worker to identify changes in their health status because of potential exposure to chemical or physical health hazards. It involves a registered medical practitioner examining and monitoring the health of workers to determine whether exposure to hazardous agents at work is affecting their health. Health monitoring typically includes:

- pre-employment (baseline) medical conducted prior to the worker commencing work
- periodic medicals undertaken at required frequencies during employment
- trigger medicals following a worker's overexposure to a health hazard and
- exit medicals upon completion of employment.

The Work Health and Safety Regulation (NSW) 2017 (WHS Regulation), specifies circumstances in which Persons Conducting a Business or Undertakings (PCBU) must provide health monitoring for asbestos and lead. Additionally, the PCBU must ensure that health monitoring is provided to a worker carrying out work for the business or undertaking if:

- The worker is carrying out ongoing work using, handling, generating, or storing hazardous chemicals and there is a significant risk to the worker's health because of exposure to a hazardous chemical referred to in Schedule 14 of the WHS Regulation.
- The person identifies that because of ongoing work carried out by a worker using, handling, generating, or storing hazardous chemicals there is a significant risk that the worker will be exposed to a hazardous chemical (other than a hazardous chemical referred to in Schedule 14 of the WHS Regulation).

In addition to above statutory requirements, the findings of the TfNSW Health Risk Assessment (HRA) process show when further health monitoring shall be undertaken. This includes (but is not limited to):

- Audiometric testing due to noise exposure performed in accordance with AS/NZS 1269.4:2014.
- Suitability assessment for Respiratory Protective Equipment (RPE) which involves evaluation of underlying medical conditions against the physiological and/or psychological demands of RPE use.
- Skin checks and assessment of occupational dermatitis due to exposure to skin sensitisers or irritants.
- Skin checks at a skin clinic due to exposure to ultraviolet (UV) radiation.
- Pre-placement medical evaluation of thermal stress tolerance and personal risk factors likely to affect thermoregulation for those workers required to work in thermally stressful environment(s).

The need for health monitoring primarily depends on the outcomes of the HRA activities detailed within the TfNSW Health and Occupational Hygiene Management Procedure. Therefore, it is crucial that this procedure is read in conjunction with the TfNSW Health and Occupational Hygiene Management Procedure, Occupational Hygiene Management Plan and the relevant HRA undertaken for TfNSW.

2 Procedure in detail

2.1 Process overview

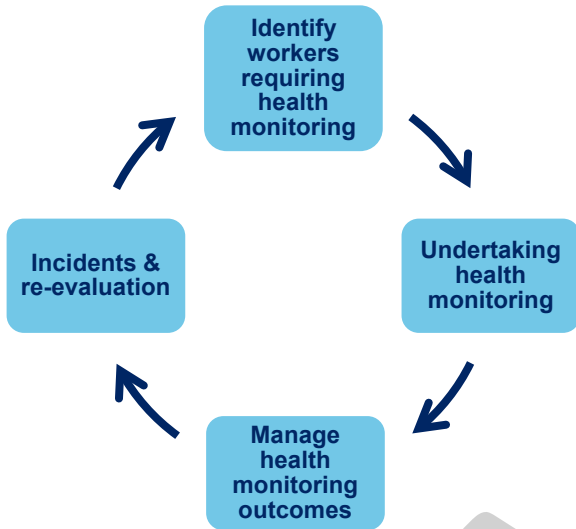


Figure 1: Health monitoring process steps

Step 1: Identify workers requiring health monitoring

- Health monitoring requirements
- Legislative requirements

Step 2: Undertaking health monitoring

- Medical provider
- Pre-employment (baseline) health monitoring
- Periodic health monitoring
- Role change health monitoring
- Triggered health monitoring
- Exit health monitoring

Step 3: Managing health monitoring outcomes

- Health monitoring report
- Fitness for work
- Communication of findings
- Worker health management
- Storage of medical data

Step 4: Incidents and re-evaluation

- Incidents
- Notifiable incidents
- Chief Health Officer

2.2 Process steps

Step 1: Identify employees requiring health monitoring

Health monitoring requirements

The information gathered during the HRA by the TfNSW Occupational Hygiene Team shall be incorporated into existing Human Resources (HR) data.

The information shall include:

- type and minimum frequency of health monitoring to be undertaken
- pre-employment (baseline) medicals conducted prior to the worker commencing work
- periodic medical minimum frequencies to be undertaken during employment
- exit medical upon completion of employment
- role change medical where a worker's role transfer could reasonably impact their health.

The health monitoring requirements shall be referenced by all TfNSW representatives involved in the health monitoring program to determine health monitoring requirements for job roles.

Legislative requirements

Health monitoring is a legislative requirement and as such is a condition of employment.

TfNSW must pay for health monitoring including:

- appointment fees
- testing and analysis costs
- worker's time and travel costs.

Workers must:

- follow, as far as is reasonably practicable, any work health and safety instructions from TfNSW
- follow any policy or procedure including health monitoring if the worker has been consulted.

Step 2: Undertaking health monitoring

Medical provider

- A medical provider shall be engaged by TfNSW to service the health monitoring requirements of the organisation, excluding the Transport agencies.
- The responsible persons and process of engagement of the medical provider are dependent on the type of health monitoring required (refer to specific sections below).

Pre-employment (baseline) health monitoring

- The TfNSW Talent team is responsible for managing the pre-employment health monitoring process of prospective employees during the recruitment process.
- The Talent team shall organise a health monitoring appointment for the prospective worker in consultation with the Hiring manager and medical provider prior to onboarding to determine whether the worker is fit for employment.
- Pre-employment health monitoring is required for workers/job roles belonging to SEGs that have been identified to present a significant risk to health because of potential exposure to occupational health hazards.

Periodic health monitoring

- The medical provider, in consultation with the line manager, is responsible for identifying and managing workers requiring periodic health monitoring in accordance with the health monitoring requirements. The medical provider shall notify the line manager of workers requiring upcoming health monitoring.
- The medical provider will schedule the health monitoring appointment liaising with the line manager and worker to determine a suitable time and date.
- The medical provider will notify the worker of the appointment. The line manager will also verbally inform the worker to attend the scheduled health monitoring appointment.

Step 2: Undertaking health monitoring

Role change health monitoring	<ul style="list-style-type: none"> The medical provider shall notify line manager and workers of recommended follow-up or next scheduled appointments. In the event a worker has been missed or is overdue for health monitoring the line manager should liaise with the medical provider to schedule an appointment. Line/hiring managers are responsible for managing workers requiring role change health monitoring in accordance with the health monitoring requirements and shall be treated as a transfer or temporary assignment/secondment. Workers changing job roles within TfNSW shall be subject to the baseline or exit medical processes, where relevant, ensuring the assessment is undertaken in accordance with the health monitoring requirements. The Line/Hiring Manager are responsible for notifying the medical provider of upcoming role changes that require health monitoring. The medical provider will organise the health monitoring appointment in consultation with the line manager and worker to determine a suitable time and date. The medical provider will notify the worker of the appointment. The line manager will also inform the worker to attend the scheduled health monitoring appointment. The medical provider shall notify line manager and workers of recommended follow-up or next scheduled appointments. The health monitoring must be conducted during the recruitment process or prior to transitioning into the new role, to determine whether the worker is fit for the new role and close out the health monitoring process in the case of exit medicals.
Triggered health monitoring	<ul style="list-style-type: none"> Triggered health monitoring may be required in the event of overexposure to a health hazard depending on the nature and magnitude of the exposure, provision of specialist testing and laboratory analysis. The requirement for triggered health monitoring shall be determine by and in consultation with the Chief Health Officer (CHO). Line manager is responsible for notifying the medical provider following consultation with the CHO. The medical provider will organise the health monitoring appointment liaising with the line manager and worker to determine a suitable time and date. The medical provider will notify the worker of the appointment. The line manager will also inform the worker to attend the scheduled health monitoring appointment. The medical provider shall notify line manager and workers of any recommended follow-up or next scheduled appointments.
Exit health monitoring	<ul style="list-style-type: none"> Exit health monitoring is required for worker's undergoing health monitoring as part of their current role, prior to the worker's cessation of employment or job role change. The worker or line manager are to complete the Separation Request in Transport Equip in the event of involuntary/voluntary separation from employment in accordance with the TfNSW Separation from Employment Procedure. The line manager must then notify the medical provider of the worker requiring an exit medical. The medical provider will organise the health monitoring appointment liaising with the line manager and worker to determine a suitable time and date, prior to the cessation of their employment. The medical provider will notify the worker of the appointment. The line manager will also inform the worker to attend the scheduled health monitoring appointment. The exit health monitoring must complement the existing health monitoring program being undertaken for the worker to assess any changes to the workers' health status.

Step 2: Undertaking health monitoring

	<ul style="list-style-type: none">The line manager in consultation with the medical provider shall ensure that exit health monitoring is undertaken in accordance with the health monitoring requirements of the role.
Worker Non-Attendance	<ul style="list-style-type: none">As health monitoring is mandatory requirement of a worker's role, if the worker is failing to meet such requirements, the one-up manager must address this with the worker in the first instance.Where reoccurring non-compliance with health monitoring exits and is considered as underperforming or unsatisfactory performance, the line manager is to contact the relevant Senior P&C Business Partner.Depending on the circumstances, the Senior P&C Business Partner will then liaise with Professional Standards and Conduct to manage the matter in a formal manner in line with the TfNSW Underperformance and Unsatisfactory Performance Procedure.

Step 3: Managing health monitoring outcomes

Health monitoring report	<p>The medical provider shall complete a health monitoring report which includes but is not limited to the following:</p> <ul style="list-style-type: none">Any test results that indicate whether or not the worker has been exposed to an occupational health hazard<ul style="list-style-type: none">specifically, lead test results must determine whether the worker has exceeded the worker's relevant blood lead level in accordance with section 415 of the WHS Regulations.Any advice that test results indicate the worker may have contracted an occupational disease, injury or illness.Any recommendation that remedial measures be taken, including whether the worker can continue to carry out the type of work that triggered the requirement for health monitoring.The date of sampling if blood, urine or other samples are taken.Results of biological monitoring and other tests carried out; for inorganic lead, the report must also contain the details of the pathology service used to carry out tests.Notification to TfNSW of any ongoing screening or monitoring appointments and requirements. <p>The medical provider will also provide recommendations in the health monitoring report about the health monitoring program for the worker, which will include:</p> <ul style="list-style-type: none">whether it is a final health monitoring reportdetails for a repeat appointment, for example:<ul style="list-style-type: none">a follow up assessment to confirm results, orthe next routine health monitoring appointmentany counselling requiredan extra medical examinationthat the worker has been referred to a medical specialist. <p>In the case of exit medicals, the medical provider must provide a written statement to a worker at the time they cease employment with TfNSW. The written statement must include:</p> <ul style="list-style-type: none">the name of the hazardous agent(s) assessedperiod of exposurehow and where the records may be obtainedany details for periodic health tests relevant in the circumstances.
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Step 3: Managing health monitoring outcomes

Fitness for work	<p>The medical provider will assess the workers' suitability to perform their current or proposed duties and advise if:</p> <ul style="list-style-type: none"> • the worker is fit to proceed with their usual work activities • the worker is fit to resume their usual activities • biological monitoring results (where applicable) show unacceptably high exposure levels • workplace control measures should be reviewed and/or • the worker should be removed from certain tasks and/or environments (potentially for a period of time). <p>The line manager, supported by Health and Safety and P&C Business Partner, shall manage the health monitoring outcomes in the event a worker is identified as permanently or temporarily 'unfit for duty' which may involve:</p> <ul style="list-style-type: none"> • Determine whether alternative suitable duties may be provided to the worker. • Remuneration requirements during employment downtime. • The suspension or termination of the workers employment.
Communication of findings	<ul style="list-style-type: none"> • The medical provider must provide a copy of the health monitoring report to: <ul style="list-style-type: none"> ▪ the worker ▪ TfNSW ▪ other PCBUs who have a duty to provide health monitoring for the worker and ▪ where indicated, to the Regulator. • The worker must be informed of the outcomes of the health monitoring, including who has a copy. The report must not be disclosed to anyone without the worker's written consent, unless required under the WHS legislation. • The medical provider shall communicate the health monitoring report to the line manager and worker.
Worker health management	<p>In the event that personal health management is required, the line manager supported by Health and Safety, Senior P&C Business Partner, TSS Health Assessments team, TSS Recovery at Work team, in consultation with the worker, shall manage the health monitoring outcomes. This shall be undertaken by:</p> <ul style="list-style-type: none"> • Liaising with the medical provider to ensure follow up medicals or medical counselling are undertaken, where required. • Developing, implementing and reviewing a personal management plan for the worker. • Determining whether alternative suitable duties may be provided to the worker. • Ensuring actions taken reduce or eliminate the risk of exposure and are based on the advice provided by the medical provider. • Consulting the TfNSW Occupational Hygiene team where required to provide Subject Matter Expert advice in relation to the review of existing exposure controls and provide recommendations for improvements. • Ensuring all required follow-up appointments are scheduled with the medical provider for the affected worker.
Storage of medical data	<p>The health monitoring reports and associated medical data must be managed in accordance with legislative requirements, and Human Resources (HR) policies and procedures. Medical records shall be:</p> <ul style="list-style-type: none"> • Identified as a confidential record about the worker. • Stored for at least 30 years after the record is made or 40 years for work with asbestos.

Step 4: Incidents and re-evaluation

Incidents All incidents shall be reported and investigated in accordance with the TfNSW Incident Management Procedure.

In the context of this procedure, an incident includes:

- diagnosed deemed disease (refer to Safe Work Australia’s Deemed Diseases in Australia (2015) and/or
- worker identified with reduced function of any body system, resultant of health hazard exposure, including overexposure to health hazards.

Notifiable incidents In the following circumstances, TfNSW must provide the health monitoring report to the regulator:

- Asbestos: potential adverse health impacts have been observed, recommendations for remedial actions have been proposed or it has been advised that the worker should not continue carrying out asbestos-related works.
- Lead: worker’s blood lead levels have been exceeded, potential adverse health impacts have been observed and recommendations for remedial actions have been proposed. The regulator must also be notified if a worker is removed from carrying out lead-risk work.
- Respirable Crystalline Silica: in the event that a worker is diagnosed with silicosis.
- Schedule 14 Substances: recommendations for review of workplace control measures have been made by the medical provider and removal of the worker from work with the hazardous chemical has been advised.

Chief Health Officer Upon review of health monitoring reports the CHO may provide guidance and advice on:

- Medical counselling requirements for workers in relation to the work that triggered the requirement for health monitoring.
- Reviewing cases where workers are identified as ‘not fit for duty’, providing advice on alternative suitable duties and roles within TfNSW.
- Assist in the review and providing advice relating to non-standard outcomes of the health monitoring process.



3 Training and competencies

Role	Training or competency
Line Management (with impacted workers)	<ul style="list-style-type: none"> • Induction and training on the implementation of this procedure. • Completion of the Health Monitoring e-Learning module for leaders.
Health & Safety Partners	<ul style="list-style-type: none"> • Induction and training on the implementation of this procedure. • Completion of the Health Monitoring e-Learning module.
Workers (requiring health monitoring)	<ul style="list-style-type: none"> • Understanding of the circumstances in which health monitoring will be required. • Completion of the Health Monitoring e-Learning module for workers or face to face version.
Occupational Hygienist	<ul style="list-style-type: none"> • Induction in the requirements of this Procedure. • A person deemed competent to provide advice on the need for implementing a health monitoring program and assist with recommending suitable workplace controls when such need has been indicated by the registered medical practitioner. • May hold a professional grade of membership with the Australian Institute of Occupational Hygienists.
Supporting TSS / TfNSW teams	<ul style="list-style-type: none"> • Induction and training on the implementation of this Procedure. • Completion of the Health Monitoring e-Learning module for leaders.

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4 Accountabilities

RASCI abbreviations	Definitions
R	Responsible: The person responsible for the system, document or tasks implementation or publication.
A	Accountable: The person accountable for the system, document or task owner with ultimate accountability for implementation or publication.
S	Supportive: the persons or stakeholders provided help by providing resources to the person Responsible
C	Consulted: The persons or stakeholders consulted before the system or document is implemented or published.
I	Informed: The persons or stakeholders informed about the system or document development, review, implementation and publishing.

	Director Health (Health & Safety)	TSS Injury and Claims Management Team	TfNSW Talent Team	People and Culture	Chief Health Officer	Medical Provider	Leaders / Line / Hiring Managers	Health and Safety Partners	TfNSW Occupational Hygiene Team	Workers
Establishing health monitoring requirements for pre-employment through to exit	A		I	I	I	I	C	S, C	R	C
Pre-employment (baseline) health monitoring			A	S, C		R	S, C		S	I
Periodic health monitoring				S, C		R	A	S	S, C	S, I
Role change health monitoring				S, C		R	A	S, C	S, C	I
Triggered health monitoring				S, C	C, I	R	A	S, C	S, C	I
Exit health monitoring				S, C		R	A	S, C	S, C	I
Completion of health monitoring report for pre-employment			A	S		R	S, C	I	I	C, I
Completion of health monitoring report for periodic, role change, triggered and exit				S		R	A	I	I	C, I
Determining fitness for work				C	A	R	S, C	S, I	S	C, I
Communication of health monitoring report to worker			A	S		R	A	S, C	S	C, I
Worker health management (recovery at work/stay at work)		A		S, C		S, C	R	S, C	S	C, I

5 Related documents

Associated documents

- TfNSW Health and Occupational Hygiene Standard
- TfNSW Health and Occupational Hygiene Procedure
- TfNSW Health Assessment Procedure
- TfNSW Health and Safety Hazard and Risk Management Procedure
- TfNSW Managing Workplace Environments Procedure
- TfNSW Hazardous Chemicals Procedure
- TfNSW Asbestos Procedure
- TfNSW Occupational Noise Management Procedure
- TfNSW Personal Protective Equipment Procedure
- TfNSW Health and Safety Incident Management Procedure
- TfNSW Separation from Employment Procedure
- TfNSW Underperformance and Unsatisfactory Performance Procedure

Legislation and references

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- Safe Work Australia. (2015). *Guide to managing risks of exposure to hand-arm vibration in workplaces.* <https://www.safeworkaustralia.gov.au/doc/guide-managing-risks-exposure-hand-arm-vibration>
- Safe Work Australia. (2019). *Guide on exposure to solar ultraviolet radiation (UVR). National Guidance.* <https://www.safeworkaustralia.gov.au/doc/guide-exposure-solar-ultraviolet-radiation-uvr>
- Safe Work Australia. (2013). *Hazardous Chemicals Requiring Health Monitoring.* [Hazardous Chemicals Requiring Health Monitoring | Safe Work Australia](https://www.safeworkaustralia.gov.au/doc/hazardous-chemicals-requiring-health-monitoring/)

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Tools and templates

- TfNSW Occupational Hygiene Management Plan

6 Definitions

Term	Definition
Audiometry (audiometric testing)	Testing of an individual's hearing ability through the measurement of hearing at different frequency thresholds.
Biological monitoring	Measurement of the chemical itself, one or more metabolites, or a characteristic reversible biochemical change induced by the chemical in urine, blood, or exhaled air.
Health monitoring	Assessment of the workers' health status by clinical, biochemical, imaging or instrumental testing to detect any clinically relevant, occupationally dependent change of a single worker's health.
HRA	Health Risk Assessment
Person conducting business or undertaking (PCBU)	An umbrella concept used to capture all types of working arrangements or structures, for instance a company, unincorporated body or association, sole trader or self-employed person. Individuals who are in a partnership that is conducting a business will individually and collectively be a PCBU.
Similar Exposure Group (SEG)	A group of workers having the same general exposure profile for the agent(s) being studied because of the similarity and frequency of the tasks performed, the materials and processes with which they work, and the similarity of the way they perform tasks.
Significant Risk to Health	As defined in Safe Work Australia's guide 'Health monitoring when you work with hazardous chemicals' or where an occupational health risk has been assigned a Risk Rating of High (Class B) or Very High (Class A), without regard for the protection afforded through the use of PPE.

7 Document control

7.1 Superseded documents

This Procedure replaces the following documents:

- OneRMS Health Monitoring Procedure (PN066P24)

7.2 Document history

Date and Procedure no.	Content author	Document owner	Approved by	Amendment notes
DD MMM YYYY SMS-P-###v#.0	Senior Manager, Occupational Hygiene	Executive Director, Health & Safety	Executive Director, Health & Safety	New document

8 Feedback and help

For advice on interpreting or applying this document, or should you have any questions on this procedure please contact the Safety branch whsms@transport.nsw.gov.au

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Appendix A - Health monitoring process map

