

## Chain of Responsibility (CoR) Policy

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### Our commitment

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Romann Logistics is committed to ensuring the highest possible levels of safety for customers, staff, contractors, site visitors, other road users and the general public. It is committed to implementing and maintaining a thorough and systematic approach to Workplace Health and Safety and Chain of Responsibility legislation, principles and practices, and thus, compliance under the Heavy Vehicle National Law.

### How we will meet our commitment

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The Heavy Vehicle National Law imposes legal liability on all those in the transport supply chain who have responsibility for tasks where their actions, inactions or demands put driver's lives and other lives at risk. Under the legislation, any party who has control in the supply chain, can be held responsible and may be legally liable.

Our objective is to eliminate, where reasonably practicable, all CoR-related risks throughout our organisation.

To this end, we have implemented a risk management based CoR Framework and CoR Management Plan throughout the organisation that addresses the CoR target areas of mass, dimension, load restraint, fatigue, speed, and vehicle standards and maintenance along with other supporting areas.

The CoR Framework sits within the Risk Management Framework and supports the Work Health and Safety Policy. The CoR Framework includes a:

- CoR Management Plan
- CoR Policy
- range of supporting policies including:

- Drugs and Alcohol
- Fatigue Management
- Speed Management
- Load Management
- Vehicle Standards and Maintenance
- Consultation and Communication
- Training and Competency
- Code of Conduct
- Document and Record Control
- range of supporting procedures including:
  - Risk Management
  - Fatigue Management
  - Speed Management
  - Load Management
  - Vehicle Standards and Maintenance
  - CoR Training and Communication
  - Hazard Observation
  - Incident Management
  - Employee Misconduct
- range of supporting workplace tools and templates

All elements of the CoR Framework and CoR Management Plan are monitored and reviewed on an ongoing basis and audited regularly according to the established audit calendar, to ensure continued compliance with the legislation and the requirements of our Risk Management Policy, Procedure and Framework.

All details of CoR-related risks, control measures and implementation responsibilities are documented in the Risk Register.

## Scope

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This policy and supporting procedures apply to any worker who is part of the Chain of Responsibility (including but not limited to the roles listed below).

## Responsibilities

Romann Logistics has identified the following roles within our organisation with obligations under Chain of Responsibility, as:

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- employer of the driver of the vehicle/prime contractor of the driver/operator of the vehicle/person conducting a business or undertaking (PCBU) referred to as 'the Transport Company'
- managers and supervisors to any of the below
- driver of the vehicle
- scheduler of goods for transport by the vehicle and/or the vehicle driver
- consignor/consignee of goods for transport by the vehicle
- loading manager
- packer of goods to be loaded on to the vehicle
- loader of goods on to the vehicle
- unloader of goods from the vehicle
- personnel responsible for vehicle standards and maintenance

A summary of the key responsibilities for each role are listed below.

### **Transport Company Responsibilities**

*The 'transport company' includes the employer, prime contractor, operator and/or PCBU. In our organisation this responsibility is accepted by the Director(s).*

#### Load restraint

The transport company must ensure the driver:

- has sufficient and appropriate load restraint equipment
- is provided with sufficient training to use it correctly

### Mass and dimension

The transport company must ensure that:

- vehicles do not exceed legal mass limits
- drivers have accurate documents of the tare weight (or empty weight) of the combination
- load plans for vehicle combinations do not exceed maximum weight limits and if load planning by pallet space, that legal axle limits are not exceeded
- proof of accreditation is available if operating under Higher Mass Limits
- legally permitted and registered vehicles are supplied that meet the legal dimension requirements

### Fatigue

The transport company must ensure that:

- driver rosters and schedules do not require drivers to exceed driving hours regulations
- drivers are able to take their required rest breaks
- the timeslot at the destination is able to be met within the legal driving hours, allowing for required rest breaks
- drivers adhere to contingency procedures that are in place to cope with unexpected circumstances like road works
- prior notification is given to the receiving/dispatching site if a timeslot cannot be made due to delays
- drivers are fit for work
- records are kept of the drivers' activities, including driving and rest times

### Speed

The transport company must ensure that:

- schedules do not require drivers to exceed the speed limit
- delivery times do not put pressure on drivers to exceed the speed limit

- contingency plans are developed to deal with scheduling issues and problems with meeting deadlines
- drivers are able to report delays or other problems
- vehicle speed limiters (if installed) are functioning and maintained

## Vehicle Standards and Maintenance

The transport company must ensure that:

- a vehicle standards and maintenance policy and associated procedures are in place and actively utilised, monitored and reported on to the Owner(s) / Executive
- where reasonably practicable vehicle standards and maintenance policies, procedures and practices will follow the Standards guidelines set forth in the National Heavy Vehicle Accreditation Scheme (NHVAS) – Maintenance Management Guide.

(See

[https://www.sciqual.com.au/sites/default/files/pdf\\_maintenance\\_management\\_guide\\_may09.pdf](https://www.sciqual.com.au/sites/default/files/pdf_maintenance_management_guide_may09.pdf))

- contingency plans are developed to deal with emergent vehicle maintenance issues that may compromise the vehicle's serviceability
- drivers are able to report faults, maintenance requests or other problems.
- Vehicles with repair requirements that may compromise safety are withdrawn from road use immediately.
- vehicle faults and maintenance requests are dealt with promptly
- daily checks and maintenance schedules as referred to under Maintenance Management Standards are maintained in an accurate and timely manner and are reported on and monitored by the Owner(s) / Executive

## **Driver Responsibilities**

*The driver is a worker who drives the heavy vehicle and transports the load to its destination by road. In our organisation this responsibility is accepted by the Driver.*

## Load restraint

The driver must:

- ensure the load is correctly restrained so that the load cannot move during transit

- have access to the loading area or dock to supervise and/or participate in the load restraint process

#### Mass and dimension

The driver must:

- ensure the vehicle does not exceed maximum limits
- load according to the load plan (or to legal axle limits if there is no load plan)
- consult with the loader to load to the best weight distribution
- assess any changes between the order and loading
- be given the opportunity to check load plans and freight prior to loading, flag any concerns with the supervisor and refuse the load if unsatisfied
- ensure they are driving a legally permitted and registered vehicle with relevant documentation

## Fatigue

The driver must ensure they understand:

- when they can start driving
- when they should stop driving
- how long their breaks should be
- whether they can complete the journey/make the time slot in time allowing for delays and rests
- how to communicate any issues or delays to the transport company
- how to record their driving hours
- how to identify when they are showing signs of fatigue and take appropriate action

## Speed

The driver must ensure that:

- speed limits are observed at all times
- safe and responsible driving behaviour is demonstrated at all times

## Vehicle Standards and Maintenance

The driver must ensure that:

- Daily Checks are performed as required in the Vehicle Standards and Maintenance Daily Check Procedure and Checklist
- Vehicle faults are reported and documented to the relevant manager as soon as reasonably practicable
- The vehicle is not driven on road, if there is a known fault which could reasonably be expected to compromise safety

## **Scheduler Responsibilities**

*The scheduler is a worker who has influence or control over the delivery time (often the person who schedules the transport of goods by road). In our organisation this responsibility is accepted by the National Operations Manager and Agent.*

### Fatigue

The scheduler must ensure that:

- driver rosters and schedules do not require drivers to exceed driving hours regulations
- drivers are able to take their required rest breaks
- the timeslot at the destination is able to be met within the legal driving hours, allowing for required rest breaks
- drivers adhere to contingency procedures that are in place to cope with unexpected circumstances like road works
- prior notification is given to the receiving/dispatching site if a timeslot cannot be made due to delays

### Speed

The scheduler must ensure that:

- schedules do not require drivers to exceed the speed limit
- delivery times do not put pressure on drivers to exceed the speed limit
- contingency plans are developed to deal with scheduling issues and problems with meeting deadlines
- drivers are able to report delays or other problems

### Vehicle Standards and Maintenance

The scheduler must ensure that:

- driver schedules allow time for daily vehicle checks
- contingency plans are in place to deal with emergent vehicle maintenance issues that may compromise the vehicle's serviceability
- vehicles with known maintenance issues that could reasonably be expected to compromise safety are not scheduled for use.



### **Loading Manager Responsibilities**

*The loading manager is a worker who supervises the activities of loaders or unloaders. In our organisation this responsibility is accepted by the Consignor.*

#### Load restraint

The loading manager must:

- ensure correct procedures are used to so that the load is securely restrained
- check when the truck arrives to ensure the load has not shifted or become unstable due to lack of load restraint
- allow drivers access to the loading area to supervise and/or participate in the load restraint process

#### Mass and dimension

The loading manager must ensure that:

- any changes between order and loading (such as extra pallets or extra weight), is conveyed to the driver, transport company and consignee
- loads are loaded and placed on trailers according to customer and/or transport company load plans
- the National Heavy Vehicle Accreditation Scheme (or NHVAS) label is checked for Higher Mass Limit compliance (if applicable)

#### Fatigue

The loading manager must:

- stop loading and contact the transport company or site manager if a driver appears fatigued
- minimise queues and have a call-up system available (on arrival, the driver checks in with the appropriate office)
- notify the driver and/or scheduler immediately of any loading delays or potential missed timeslots
- take reasonable steps to ensure the driver is able to take rest while waiting for the vehicle to be loaded/unloaded
- contact the transport company if the truck does not arrive on time and advise them of the next available timeslot or the delay time

- ensure a truck parking area and facilities are provided

## Speed

The loading manager must ensure that loading and unloading:

- arrangements do not require drivers to speed
- times and delays are regularly reviewed
- bottlenecks are identified and resolved promptly

## Vehicle Standards and Maintenance

The loading manager must ensure that:

- any observed vehicle maintenance issues are reported and documented in a timely manner, and if such issues could reasonably be expected to compromise vehicle safety, that vehicle is not to be used on the road.

## **Packer Responsibilities**

*The packer is a worker who packs and prepares the goods prior to loading. In our organisation this responsibility is accepted by the Consignor.*

## Load restraint

The packer must use methods to ensure safe packing, such as:

- stacking goods in a safe manner
- ensuring goods are secured to the pallet
- ensuring goods are stretch wrapped where necessary

## Mass and dimension

The packer must ensure that:

- individual pallet weights are correct
- load documentation and labels are accurate
- goods packed in freight containers do not exceed the container's cargo capacity

## Fatigue

The packer must ensure that the load is:

- packed in a timely manner, without unnecessary delays
- packed and ready to be loaded at the agreed loading time

### **Loader Responsibilities**

*The loader is a worker who is responsible for loading the goods into or onto the vehicle. In our organisation this responsibility is accepted by the Consignor.*

#### Load restraint

The loader must use methods and load restraint equipment to ensure loads do not:

- become unstable
- move inside the vehicle, container or other containment equipment

#### Mass and dimension

The loader must ensure that:

- pressure is not put on the driver to load more than is legally allowable
- the vehicle load does not cause the vehicle mass or dimension limits to be exceeded
- for palletised loads, the driver is advised of the actual/indicative weight of each pallet and consulted to ensure that goods are loaded to the best weight distribution

#### Fatigue

The loader must ensure that the load is:

- loaded in a timely manner, without unnecessary delays
- ready to be loaded at the agreed loading time

#### Vehicle Standards and Maintenance

The loader must ensure that:

- any observed vehicle maintenance issues are reported and documented in a timely manner, and if such issues could reasonably be expected to compromise vehicle safety, that vehicle is not to be used on road.

### **Unloader Responsibilities**

*The unloader is a worker who is responsible for unloading the goods from the vehicle. In our organisation this responsibility is accepted by the Consignee.*

#### Fatigue

The unloader must ensure that the load is:

- unloaded in a timely manner, without unnecessary delays

#### Load restraint

The unloader must ensure that the load is:

- checked on arrival to ensure the load has not shifted or become unstable due to lack of load restraint

#### Vehicle Standards and Maintenance

The unloader must ensure that:

- any observed vehicle maintenance issues are reported and documented in a timely manner, and if such issues could reasonably be expected to compromise vehicle safety, that vehicle is not to be used on road.

### **Consignor/Consignee Responsibilities**

*The Consignor is the person or company who dispatches the goods for delivery.  
The Consignee is the person or company who orders and/or receives the goods.*

#### Load restraint

The consignor/consignee must ensure that:

- the transport company is given correct and appropriate information so they can supply suitable vehicles and adequate load restraint equipment for the load
- product packaging can withstand stacking and restraint forces without damage or breakage

#### Mass and dimension

The consignor/consignee must ensure that:

- booked or ordered loads do not exceed maximum legal weight/dimension limits
- the transport company is legally registered and permitted to undertake the job they are contracted to complete

## Fatigue

The consignor/consignee must ensure that:

- orders are placed in a timely manner to allow for dispatch that can meet delivery requirements
- the timeslot for dispatch or receipt factors in appropriate time for the job to be completed within the legal driving hours, including required rest breaks
- the delivery request does not require (or incentivise) the driver to exceed driving hours and/or forego minimum rest periods
- if the agreed time is not met, alternative agreements are in place to ensure they do not breach CoR legislation

## Speed

The consignor/consignee must ensure that:

- no pressure is put on the driver to exceed the speed limit
- appropriate time is factored for the job to be completed without requiring the driver to speed
- contingency plans are developed to deal with scheduling issues and problems with meeting deadlines
- contracts include speed compliance and monitoring

## Vehicle Standards and Maintenance

The consignor/consignee must ensure that:

- any observed vehicle maintenance issues are reported and documented in a timely manner, and if such issues could reasonably be expected to compromise vehicle safety, that vehicle is not to be used on road.

## Supporting policies and procedures

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This policy operates within the Risk Management Framework outlined in the Risk Management Policy and Procedure and the Work Health and Safety Policy.

This policy should be read and followed in conjunction with the:

- Drugs and Alcohol Policy
- Fatigue Management Policy and Procedure
- Speed Management Policy and Procedure
- Load Management Policy and Procedure
- Vehicle Standards and Maintenance Policy and Procedure
- Consultation and Communication Policy
- Training and Competency Policy
- Document and Record Control Policy
- Code of Conduct Policy and Employee Misconduct Procedure
- Hazard Observation Procedure
- Incident Management Procedure

## Implementation and evaluation

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Romann Logistics will ensure this Policy is reviewed and evaluated for its effectiveness in delivering policy objectives on an annual basis or earlier in the event of major changes to the legislation or our organisation structure and operations.

**Policy authorised by: George Manassa,  
National Business Development Manager**

**Signature: GM, digitally signed 05.04.2022**

*Policy issue date: 04.04.2022*  
*Policy version number: v1*  
*Policy review due date: 27.07.2022*



I have read and agree with the policy above.

**Name:**

**Signature:**

**Date:**

**Authorised Officer:**