



CONTRACTOR HEALTH, SAFETY AND ENVIRONMENT MANAGEMENT

Selection and Management of Contractors For Major, Minor and Service Provision Contracts

Guide for Contractors

Version 3.0

July 2015

**Feedback on Selection and
Management of Contractors
Guide for Contractors**

Comments on this guide and improvement suggestions are welcomed. To assist, a Feedback Form, suitable for photocopying, is located at the end of this booklet. Please address any such feedback to:

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UPDATE INFORMATION

Version 1.0 of this guide was issued on 1 February 2004 and is updated regularly. It is essential that the current version of the handbook is used, which may be provided in tender documents or on East Gippsland Water's website from time to time:

www.egwater.vic.gov.au/contractors.

Minor updates occurred between 2004 and 2014, but January 2014 saw the incorporation of the Department of Treasury and Finance (DTF) Implementation Guidelines for the Victorian Building and Construction Industry Code of Practice and the transition to version 2.0. These have since been rescinded which has prompted a revised Version 3.0.

INTRODUCTION

Scope

The purpose of this handbook is to provide information to contractors about the East Gippsland Water (EGW) process for the selection and management of contracts with regard to health, safety and environmental requirements.

It is intended purely as a guide, and does not replace any information contained in any tender or contract documentation.

Definitions & Abbreviations

'Contractor' – means the person or persons, firm, company or other entity whose tender has been accepted by EGW, including any of their personal representatives and/or successors.

'Contract Manager' – means an authorised representative of EGW or engineering services consultancy engaged by EGW to be responsible for management of a contract. Contract Manager includes the Superintendent, Superintendent's Representative, Project Manager, Consultant or Agent. The Contract Manager may not be the same individual throughout the process.

'Contract HSE Plan' – means a contract HSE plan to EGW standards.

'Competent Person' – means a person who has, through a combination of training, education, and experience, acquired knowledge and skills enabling that person to correctly perform a specified task.

'Environmental Impact' – means any change to the environment whether adverse or beneficial, wholly or partially resulting from an organisation's activities.

'Environmental Management Plan (EMP)' – means an environmental management plan to EGW standards.

'Hazard' – means a source of potential harm, or a situation with the potential to cause harm.

'OHS' – means occupational health and safety.

'OHS Act' – means the Victorian Occupational Health and Safety Act 2004.

'Principal Contractor' – for the purposes of Chapter 5 of the Occupational Health and Safety Regulations is a person or company appointed by East Gippsland Water to manage or control a workplace for a project valued at \$350,000 or more.

'Risk Assessment' – means an evaluation of the risk associated with a particular safety hazard or environmental impact, in terms of the consequences and likelihood of the event happening.

'Risk Assessment Process' – means the process of identifying hazards, assessing the risk associated with those hazards, and the implementation of measures to control the risk.

'Safe Work Method Statement' – is a document that:

- lists the types of high risk construction work being done;
- states the health and safety hazards and risks arising from that work;
- describes how the risks will be controlled; and

- describes how the risk control measures will be put in place.

'Safe Work Procedure' – means a documented procedure for the safe performance of a task.

EAST GIPPSLAND WATER HSE POLICY SUMMARY

East Gippsland Water is committed to achieving the highest level of HSE management for all contracts.

This will be achieved through:

- careful selection of contractors and liaison with them to ensure that safety hazards and environmental impacts are controlled, and
- investigation of any incidents and prompt implementation of corrective actions.

East Gippsland Water believes that all major incidents are preventable and aims to achieve the lowest possible lost time injury rate.

From a health & safety perspective, the Corporation supports the notion that the accountability for OHS rests with every individual. All employees, contractors and subcontractors are required to abide by all safety-related policies and procedures.

East Gippsland Water aims to ensure that all of its employees, contractors and subcontractors have the necessary knowledge and skills to undertake their work in a safe and healthy manner with minimal adverse environmental impacts.

CONTRACT HSE REQUIREMENTS

General

Major and minor contracts are administered differently, but the HSE management processes are closely aligned, particularly where contractor employees or subcontractors are involved.

Both may require the completion of a Contract Health, Safety and Environment Plan (CHSEP) by the successful tenderer before commencing works, which

becomes the basis for any subsequent workplace inspections.

Complex environmental issues may result in a requirement for the contractor to develop an Environmental Management Plan (EMP).

Guidance on the development of relevant plans / risk assessments is available from the East Gippsland Water website –

www.egwater.vic.gov.au/contractors

Small, single operator contracts are termed Service Provision Contracts. While the CHSEP does not apply, a service provision contractor will still be required to demonstrate compliance with any HSE requirements relative to his/her operations.

Although the bulk of this guide is designed to be used for major and minor contracts, parts also apply to service provision contracts.

Major Contracts

Contracts valued above \$100,000 are classified as major and will usually result in formal contracts being issued in accordance with AS 2124, General Conditions of Contract.

However, value alone does not reflect the level of risk associated with the contract works. Sometimes the most significant cost in major contract may relate to supply of equipment, and the contract may comprise only a very small labour (risk) component. Unless this type of contract involves activities listed under High Risk Contracts, it should be classed as low risk and managed as for low risk minor contracts.

Minor Contracts

Contracts not deemed to be major on the basis of value, but still involving the use of contractor employees may be classed as minor. These are usually not subject to formal contracts, however, the need for certain HSE specifications still exists and will be factored into a letter of acceptance, or other suitable documents.

Depending on the tasks and activities involved, minor contracts may be classified as high or low risk, and are managed accordingly (see below).

High Risk Contracts

East Gippsland Water has an obligation to insist on more sophisticated management systems when engaging contractors to perform hazardous or **high risk construction work**. Such work may be construction work:

- involving confined spaces
- where there is a risk of a person falling more than 2 metres
- involving demolition
- involving the removal or likely disturbance of asbestos
- involving structural alterations where some sort of temporary support will be used to prevent collapse
- involving a trench or shaft deeper than 1.5 metres, or any tunnel
- involving the use of explosives
- on or near roadways or railway lines that are in use
- on or near overhead or underground power supplies,
- on or near gas piping or chemical, fuel or refrigerant lines
- involving exposure to dangerous chemicals
- in an area that may have a contaminated or flammable atmosphere
- involving tilt-up or precast concrete
- involving the use of powered mobile plant
- involving diving
- in, over or near water or other liquids if there is a risk of someone drowning
- involving hazardous manual handling

East Gippsland Water also considers work involving significant hazards to the public in this category.

Complex contracts involving several subcontractors, or long term contracts (in excess of 12 months) may also be classed as high risk.

Similarly, complex environmental issues may result in the contract being classified as high risk, and an EMP required.

Work in acid sulphate soil zones will require specific plans and treatment measures – see page 11.

Low Risk Minor Contracts

A **low risk minor contract** is one which is valued at less than \$100,000 (excluding supply of materials), is not covered under a service agreement, does not involve one or more of the high risk hazards listed above, but extends for more than two days and involves the use of contractor's own employees.

Service Provision Contracts

Service Provision contracts typically include a sole operator who provides one-off labour and/or plant and equipment in support of East Gippsland Water operations.

Contractors providing services in this classification must demonstrate specific understanding of the health and safety requirements of the work to be performed. Furthermore, the single service provision contract health and safety requirements will require that contractors plan their work, identify the hazards and have in place suitable control measures as part of a risk assessment process.

Long term relationships for services such as lawn mowing/grounds maintenance, on-call plant operator hire and electrical and/or plumbing works may be classified as service agreements. Service agreements are managed differently again, and are not included in this handbook.

Appointment of a Principal Contractor

Construction projects valued at \$350,000 or more (including all labour and materials) require the appointment of a Principal Contractor who is responsible for health and safety coordination for the project. We may

appoint a contractor to be the “Principal Contractor” for the purposes of Regulation 5.1.14 of the Occupational Health and Safety Regulations 2007.

Should this be the case, East Gippsland Water will authorise the principal contractor to manage or control the workplace to the extent necessary to discharge the duties imposed on the principal contractor by Regulations 5.1.15 to 5.1.18

OVERVIEW OF PROCEDURE

Contract Risk Assessment & Categorisation

East Gippsland Water staff will conduct a preliminary assessment of the contract works and advise any identified OHS and environmental hazards & risks to tenderers. The contract will also be categorised as major, minor, high or low risk, or service provision.

Additional requirements may be discussed with the successful tenderer and incorporated into the Contract HSE Plan (where contractor employees or subcontractors are used), EMP (where required) or safe work method statement / risk assessments (for sole operators or low risk works). Tenders or quotes for the provision of the works will then be sought, with safety and other requirements provided as part of the contract specifications.

Tender Evaluation and Pre-Qualification

In order to meet its obligations as a principal employer under the Occupational Health and Safety Act 2004, East Gippsland Water requires contractors to demonstrate evidence of compliance with all Victorian workplace safety legislation.

‘Pre-qualified tenderers’ are those that have been previously assessed for Victorian government work under the criteria of performance capability, organisational capacity, resource availability and HSE management; and have been placed on either the Department of Infrastructure

Construction Supplier Register or the VicRoads Pre-Qualification and Registration Scheme.

For East Gippsland Water tenders, unless a tenderer is ‘pre-qualified’, or provides evidence of current third party accreditation of their Occupational Health & Safety Management System (OHSMS) and Environment Management System (EMS), a review of a completed HSE questionnaire submitted by the tenderer is required. The objective of this review is to establish the level of competency of the tenderer with regard to HSE in general, and to determine whether a validation assessment is warranted. Where the questionnaire indicates a low level of understanding of HSE management and a ‘wide gap’ in compliance level, a tenderer may be discounted from further evaluation.

Once the questionnaire has been reviewed, and the reviewer is satisfied that a reasonable standard of HSE management exists, a validation assessment may be arranged. This assessment, which is usually conducted on the contractor’s site, will seek evidence of the HSE management system in operation and focus on compliance with safety/environment legislation and industry practices.

Samples of completed documentation (such as risk assessments, inspection & maintenance records, training information, contract safety plans etc) may be examined and commented upon. In some cases, interviews with the tenderer’s employees may be appropriate.

A contract may be awarded if, in the opinion of the assessor, the tenderer:

- satisfies the validation assessment,
- shows a commitment to improving their HSE management system, and the risks relevant to the contract works may be satisfactorily controlled through the use of a Contract HSE Plan or relevant risk assessments.

MANAGEMENT OF THE CONTRACT

Contract HSE Plan

Regardless of the status of a contractor's OHS and Environment Management Systems, the successful contractor is required to complete a Contract HSE Plan (CSHEP), or agreed equivalent, to the satisfaction of East Gippsland Water.

A CHSEP is an agreed approach to managing the safety and environment aspects of the contract works and forms the basis for ongoing inspections and action arising from non-conformances with the plan.

For single service provision or other small / low risk contracts, a written safe work method statement / OHS and environment risk assessments will normally take the place of a CHSEP. Contractors may use EGW forms (including Form 048) to meet these requirements.

A Principal Contractor appointed under Reg 5.1.14 of the OHS Regulations 2007 is required to ensure the safety of all subcontractors is addressed in the CSHP.

Induction

The contractor is required to ensure that all of his/her staff, including sub contractors, are inducted based on the CHSEP. A specific contract induction prior to the commencement of works will normally be conducted by East Gippsland Water or engineering service provider staff.

The induction is to be recorded on the CHSEP or risk assessment form.

In accordance with Part 5.1 of the OHS Regulations 2007 all construction contractor employees are to have completed approved construction industry induction training.

Site Inspections & Non-conformances

Depending on the nature and duration of the contract works, random inspections may be carried out by East Gippsland Water or engineering service provider staff.

Any non-conformances with the CHSEP or risk assessments observed during site inspections are to be rectified by the contractor.

Significant or repeated non-conformances will be recorded and may affect the evaluation of contractor performance that will be completed at the completion of the contract. Repeated significant non-conformances may result in other action consistent with the terms of the contract.

Contract Records

Contractors will retain such records as required to fulfil the requirements of the CHSEP and meet any legislative requirements. These are to be made available to East Gippsland Water or engineering service provider staff on request.

Incident Notification and Investigation

The contractor must promptly notify East Gippsland Water or the superintendent of any accident, injury, property or environmental damage that occurs during the carrying out of the contract works. This also applies to any unplanned disruption to EGW services.

The contractor is to immediately notify the superintendent of any injury or occurrence requiring notification to WorkSafe. The same applies to incidents reported to any other regulators, eg: EnergySafe Victoria.

Any incident involving a member of the public is to be reported to the superintendent without delay.

A written notification is to be provided within 24 hours of becoming aware of the incident and an investigation report within 48 hours unless otherwise agreed.

Any other injury or dangerous occurrence is to be reported to the superintendent at the earliest opportunity, and followed up with a written investigation report.

Advice may be sought from East Gippsland Water specialist HSE staff if required.

HSE Performance Reporting

Where required in the contract specifications, a monthly summary of HSE performance is to be provided in the format provided.

First Aid

The contractor is expected to make arrangements for appropriate first aid resources for the duration of the contract works.

This may be achieved by meeting the “prescribed approach” contained in the WorkSafe Victorian Compliance Code for First Aid, or completing a first aid assessment relevant to the contract works under consideration, or by producing evidence of an existing first aid assessment that covers the scope of the contract.

Evaluation of Contractor Performance

Contractor HSE performance will be evaluated on completion of the contract and may form part of the evaluation process for future tenders.

Insurance and Licences

Contractors with employees are to have a current WorkCover worker’s compensation policy and public liability insurance (unless principal provided public liability cover is specified in contract documentation).

Any insurances, licences or qualifications that are due to expire either before commencement, or during the course of a contract, are to be renewed to ensure that currency is maintained.

SPECIFIC OHS HAZARDS AND EAST GIPPSLAND WATER EXPECTATIONS

The following is a list of some of the common hazards that may be associated with East Gippsland Water Contract works.

The list is not exhaustive and contractors will be expected to complete their own hazard identification and control process. Contractors are also expected to work in accordance with relevant safety legislation, Codes of Practice and Australian Standards.

For all hazards, guidance from East Gippsland Water specialist safety staff may be requested.

All high risk construction works are to be the subject of a SWMS.

Additional guidance may be obtained by the joint VicWater and Civil Contractors Federation Civil Construction Safety Guides, available on the East Gippsland Water website - see page 12 - and the WorkSafe Industry Standard for Civil Construction (Ed 1 June 2012).

Asbestos

In accordance with Part 4.3 of the Occupational Regulations 2007, and under the terms of East Gippsland Water’s Class B Specific Asbestos Removal Licence, only direct employees of a licensed asbestos removalist are permitted to remove or repair asbestos cement pipes.

Similarly, only appropriately licensed asbestos removalists will be engaged to remove other asbestos containing materials (ACM).

An assessment of all ACM is undertaken 5-yearly and all ACM has been identified and labelled. Where work on or adjacent to ACM is planned, contractors will be referred to the facility superintendent and measures in accordance with East Gippsland Water’s Asbestos Management Plan (SOP 090) undertaken.

Confined Space Entry

Confined spaces include any space which is not intended as a permanent or ongoing workplace, that has restricted means of access, and that contains or may contain a hazardous atmosphere, or some other hazardous environment.

Sewer assets are almost always designated as confined spaces. Trenches may become a confined space depending on other environmental factors.

Confined spaces are dangerous places and require particular risk control measures, including completion and issue of a permit to work. Only trained and competent personnel may be involved in confined space entry work.

For East Gippsland Water contracts, a confined space entry course or refresher must have been completed within the previous 12 months.

Chemicals

A register of all chemical and current material safety data sheets will be located on site and made available to all staff, including sub contractors, and East Gippsland Water/engineering personnel.

Chemicals used are to have been assessed as possessing the lowest risk in order to undertake the task required.

All employees and subcontractors are to be informed of the hazards associated with the chemicals used, and their safe use requirements.

Chemical containers are to be appropriately labelled and stored at all times. New chemicals to be brought on site will first be subject to a risk assessment. Material safety data sheets are to be located in the chemical register and all employees informed of safety requirements before first use.

Electrical Equipment and Power Tools

All electrical equipment is to be tested and tagged in accordance with AS 3760 In-service Inspection of Electrical Equipment OR the WorkSafe Victoria

Industry Standard for Electrical Installations on Construction Worksites (as amended from time to time).

For construction sites, the test interval is not to exceed 3 months.

Residual current devices (earth leakage protectors) are to be used where required. Electrical leads are to be elevated above ground level where wet ground or other hazards exist.

Electrical Work

All electrical work is to be carried out only by suitably qualified persons, and in accordance with relevant standards.

No work on energised electrical circuits is to be performed without prior approval, and only when absolutely required. Appropriate safety precautions must be in place should this occur.

Lifting Equipment

All lifting equipment used in connection with East Gippsland Water contract work must have evidence of current in-service inspection and testing.

Any items found to be outside of test date will be removed from the work site and replaced with a serviceable item.

Manual Handling

Contractors are to ensure that manual handling of heavy material is minimised. Where heavy items (eg 40kg and above), items that are unstable/difficult to hold, or animals are to be handled, a manual handling risk assessment is to be completed and/or mechanical assistance provided.

Tasks involving periods of sustained awkward posture or repetitive movements for more than 30 minutes at a time, or 2 hours over a whole shift, are classed as 'hazardous manual handling tasks' and are also to be subject to a risk assessment and appropriate risk control measures implemented.

Plant and Equipment

All plant and equipment is to be fit for the purpose for which it is intended. All operators are to have appropriate licences or competencies.

All items of plant will be inspected daily before first use and maintained in good condition and fit for purpose.

Any plant found to be not in a safe condition will be removed from site and replaced at the contractor's expense.

Permit to Work

EGW Form 101 permit to work is a record authorising an identified 3rd party to undertake specific work in a designated area. A permit to work may be in addition to application of a site risk assessment using a relevant risk assessment form including safe work method statements for high risk work where deemed necessary by either party.

Personal Protective Equipment

Personal protective equipment is to be individually issued (in most cases) and maintained in good condition and fit for purpose in accordance with the relevant Australian Standards.

Protective helmets are to accord with AS 1800, and are to be replaced at intervals no greater than 3 years (or less where excessive wear and tear exists).

PPE found to be not in a safe condition will be removed from site and replaced at the contractor's expense.

Public Safety

Public safety is to be a paramount consideration at all times. All machinery is to be left in a safe condition so as to not present a hazard to the public. No trenches or openings are to be left unattended.

All works are to be appropriately barricaded and adequate measures undertaken to prevent unauthorised access to the work site, particularly

when contractor staff are not in attendance.

Traffic Management

For any work on roads or in road reserves, appropriate traffic management control measures are to be used in accordance with the VicRoads Code of Practice for Worksite Safety - Traffic Management.

Only competent persons trained in traffic management systems are to create traffic management plans, place traffic control signage, or act as a traffic controller.

Work on *VicRoads designated roads* requires the use of VicRoads prequalified traffic management companies to develop and implement traffic management plans and traffic guidance schemes.

Pedestrians are to be afforded adequate protection that accords with the above mentioned Code of Practice.

All persons working near roadways should receive appropriate awareness training.

Trenching & Excavations

Before commencing any excavations, underground services are to be located using the Dial Before You Dig service and confirmed by appropriate service locations.

All trenching and excavation greater than 1.5 metres in depth is to be reported to WorkSafe Victoria at least 3 days before the work commences.

All trenches greater than 1.5 metres in depth are to be appropriately shored, battered or otherwise protected from collapse.

Trenching less than 1.5 metres in depth still needs to be protected from trench collapse.

At least one person trained and competent in trench safety is to be present during trenching works deeper than 1.5 metres.

Trenching in excess of 2 metres deep also requires protection from falling in.

Trenches are to be inspected regularly to ensure integrity of trench walls.

All trenches are to be backfilled before the end of the day and no trenches are to be left unattended so as to pose a risk to persons.

UV Radiation

Australia has the highest rate of skin cancer in the world and the potential for injury from over exposure to UV rays from the sun are well known. However, building and construction workers are exposed to five times the recommended exposure limits for UV radiation.

Contractors are to implement measures to minimise the risk of UV exposure by:

- providing sun protective clothing, including wide brimmed hats
- providing and encouraging the use of SFP 30+ sunscreen
- where possible, maximising the use of shade and other shelters, particularly during the period 2 hours before and after solar noon and where the UV index is high
- informing employees and subcontractors of the dangers associated with UV exposure
- setting the example to employees and subcontractors
- enforcing the measures adopted

Work At Height

Adequate protection against falls from height is to be provided for all persons who are required to work within 2 metres of an edge where the potential for a fall from height greater than 2 metres exists. This includes work on roofs, ledges, or adjacent to open pits.

Fall protection may be in the form of barricades, scaffolds or appropriate fall arrest systems.

All scaffolds above 4 metres in height are to be erected by a qualified person. Scaffolds of 4 metres or less are to be erected by a competent person.

Ladders may only be used as a means of access/egress, or as a platform only to perform light work. All ladders used in an industrial situation are to be rated to at least 120 kg.

Working Near Power Lines

Working near underground or overhead power lines carries with it the danger of electrocution in the event of contact with the lines, or by coming close enough to cause an arc to occur.

Strict adherence to NO GO ZONES and the use of competent spotters is required.

Persons working near power lines should receive electrical awareness training.

EGW Form 048

East Gippsland Water staff use Form 048 - Field Work Hazard Identification and Control checklist which has been developed to act as a safe work method statement framework for high risk construction and other field work. This form is available for use by contractors and is located on our website via the contractor safety on-line facility.

ENVIRONMENTAL MANAGEMENT

All contractors are responsible for identifying and monitoring environmental issues relating to worksite operations, and controlling adverse environmental impacts. Common environmental impacts are associated with the following:

- Drainage control from construction site including drainage stabilisation, sediment and stormwater control
- Dewatering worksites
- Waterway and floodplain protection
- Water quality / monitoring
- Dust control
- Topsoil management
- Stockpile and batters management
- Noise and vibration
- Waste management
- Air quality

- Storage of chemicals, including fuels
- Road cleaning
- Infrastructure protection
- Flora and fauna
- Cultural heritage
- Weeds and pathogens
- Fire management
- Acid Sulphate Soils

Depending on the complexity of the works under contract, the identification of any or all of these impacts may result in the requirement for contractor to develop a site specific Environment Management Plan (EMP), or cover impacts by the use of an environmental risk assessment.

Rather than replicate environmental requirements, East Gippsland Water endorses the CCF Environmental Guidelines for Civil Construction as guidance for dealing with environmental issues.

Guidance and document templates are available from East Gippsland Water specialist HSE staff.

All environmental incidents are to be reported to the superintendent without delay.

Acid Sulphate Soils (ASS)

Acid Sulphate Soils or ASS naturally occur in coastal and inland settings and are generally located in low lying areas within coastal plains, wetlands or along the edges of water bodies. The soils contain metal sulphide minerals, which if drained, excavated or exposed to air can react and form sulphuric acid.

Land that may be affected by ASS can be located at the following website:
http://vro.dpi.vic.gov.au/dpi/vro/vrosite.nsf/pages/soil_acid_sulfate_soils.

Any land that falls within the 'red zone' on the mapping, is deemed as potential acid sulphate soils, will require further assessment and development of an ASS Management Plan. EGW HSE staff have skills in the area of ASS management and can assist in this regard.

EMERGENCY MANAGEMENT

Before any site works commence, the contractor (or Principal Contractor) is to develop an emergency response plan (ERP) based on the site's location and the type of works to be undertaken.

The ERP should anticipate emergencies that could occur, such as:

- Plant rollover and vehicle collisions
- Contact with overhead powerlines or underground utility assets
- Excavation collapse or flooding
- Fire
- Treatment for and evacuation of injured or ill workers
- Emergency communications

If emergency services are to provide rescue or medical treatment, site access for their vehicles needs to be considered, as does appropriate means of communicating the precise site location.

When developing the ERP, the contractor (or Principal Contractor) should check if local emergency services can provide the required services. If necessary, alternative arrangements should be documented to ensure timely medical treatment or rescue (eg: first aider trained in more advanced resuscitation techniques/use of defibrillators, giving oxygen).

CONTRACTOR HEALTH, SAFETY & ENVIRONMENT ON-LINE

In an effort to enhance our collective safety performance, *Contractor Health, Safety & Environment On-Line* has been developed and is located on the East Gippsland Water website at:
www.egwater.vic.gov.au

The site includes copies of East Gippsland Water's Health & Safety and Environment policies, and Standard Operating Procedures that are relevant to contractors' operations; PDF or Word versions of all of our contractor safety management forms and instructions for completion; various forms and checklists, and an up-to-date version of this guide.

It also contains links to useful resources such as government safety related websites.

Contractor HSE On-line is accessed from East Gippsland Water's homepage at www.egwater.vic.gov.au by pressing the Contractors" link on the home page.

YOUR FEEDBACK

Your comments on this guide and improvement suggestions are welcomed. To assist, a Feedback Form, suitable for photocopying, is located at the end of this booklet.

