



Finance,
Services &
Innovation

Regional and Remote Service Stations Project

Evaluation Report

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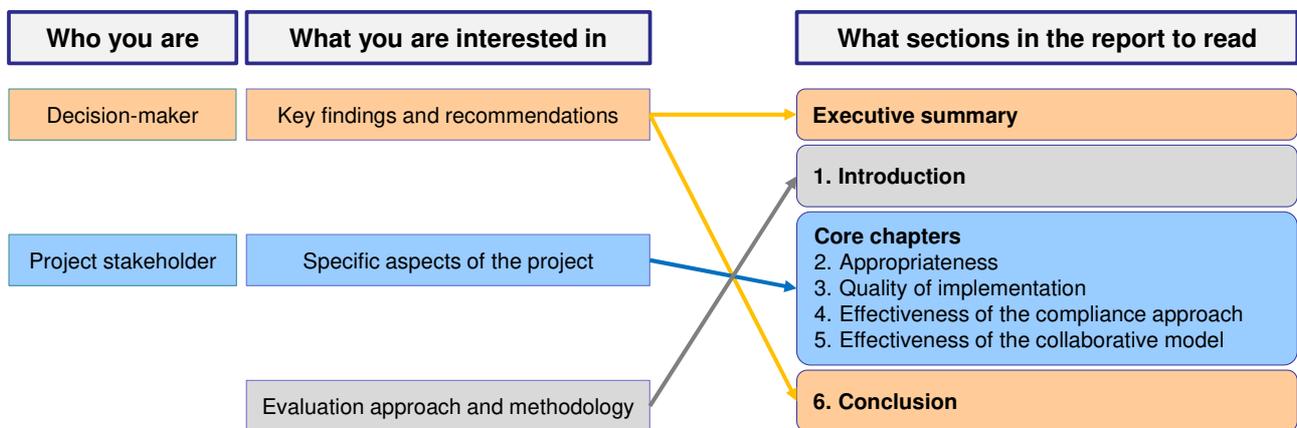
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This document

How to read

This report has several levels of reading depending on the role or perspective of the reader as explained in the reading guide pictured in Figure 1. Sections have active headings in the form of key findings to make it easier for the reader to identify areas of interest.

Figure 1. How to read guide



Acknowledgement

This work was completed with the assistance of Donna Ross, SafeWork Regulatory Project Officer.

We would also like to thank key informants from SafeWork including inspectors, Fair Trading, as well as businesses we interviewed as part of this evaluation. We thank them for their time and insights and trust that their views are adequately represented in this report.

The evaluation team

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Glossary

Term	Definition
BAU	Business As Usual
BRD	Better Regulation Division
CRP	Commerce Regulation Program
CRP Joint Field Practice Reference Group (previously known as Vocational Group)	The CRP Joint Field Practice Reference Group has been formed to support the communication and understanding of the Commerce Regulation model and achieve the Commerce Regulation Program. It provides a reference point for addressing existing identified issues with the opportunity for timely input, and a forum for newly identified issues.
Customer Service Centre	Customer Service Center (CSC) is the central point of contact in SIRA and SafeWork NSW to answer public enquiries.
FuelCheck	FuelCheck is an online tool providing consumers with real-time fuel price information covering every service station across NSW. Services stations have a legal obligation to be registered on FuelCheck and to ensure the prices displayed on the petrol price signboard matches the price on the fuel pump and what is shown on FuelCheck.
GLS	NSW Government Licensing System
Manifest	<p>A manifest is a written summary of specific types of hazardous chemicals with physicochemical hazards and acute toxicity that are used, handled or stored at a workplace. It contains more detailed information than a register of hazardous chemicals as its primary purpose is to provide the emergency services organisations with information on the quantity, classification and location of hazardous chemicals at the workplace. It also contains information such as site plans and emergency contact details.</p> <p>Service stations are required to have a manifest if they store above manifest quantities of fuel and LPG. For example if they store more than 2,500L of petrol they will need a manifest.</p>
PCBU	A 'person conducting a business or undertaking' (PCBU) is a legal term under WHS laws for individuals, businesses or organisations that are conducting business. A person who performs work for a PCBU is considered a worker.
WHS	Work, Health and Safety
WSMS	WSMS stands for <i>Workplace Services Management System</i> and is used by SafeWork NSW and it's inspectors to record interactions between PCBU's / employers and SafeWork.

Executive summary

The Regional and Remote Service Stations project

Between December 2016 and end of June 2017, SafeWork inspectors visited 201 service stations in regional and remote New South Wales to build their capability to comply with Work, Health and Safety (WHS) requirements. The project was initiated by the SafeWork Ballina office in early 2016, which identified some recurrent compliance issues among small independent service stations. It then became a collaborative regulatory services project under the Commerce Regulation Program (CRP) with the inclusion of a Fair Trading component. As part of the audit visits conducted for this project, SafeWork inspectors collected information on behalf of Fair Trading about price signage requirements and registration on FuelCheck.

The evaluation

The purpose of the evaluation was twofold:

- assessing the effectiveness of the project with regard to its specific objectives around improving businesses compliance
- assessing the effectiveness of CRP operating model for collaborative regulatory projects. The findings from the evaluation should help improve the project turning into Business As Usual, and inform the design of future collaborative projects.

The evaluation relied on a mix of qualitative and quantitative methods. Interviews were the core methods to unpack participants' experience of the project. A total of 40 individuals were interviewed as part of the evaluation data collection phase: 16 businesses, 13 SafeWork inspectors, 10 internal project stakeholders and one external project stakeholder. Quantitative analysis of project data – in particular from Workplace Services Management System (WSMS), the SafeWork customer relationships management database, data extracted on 17 July 2017 – provided critical evidence about compliance issues encountered and the direct impact of the project on businesses capability in this regard.

The evaluation team was able to implement the methods as intended. The number of interviews conducted is deemed appropriate to identify key themes in the experience of project's participants. With regard to the project data, the scope and quality of the data is considered as good to very good overall. All visits were captured into WSMS including responses to selected project questions, and some checks and data cleaning were conducted to further improve the quality of the data.

Key findings

Businesses visited were an appropriate target with regard to their compliance needs and limited prior contact with regulators

Internal project stakeholders were generally satisfied with the process that informed the design of the project. The initial stage of the project involved some consultation with internal and external stakeholders, in particular around the design of the audit tool. A few stakeholders pointed out that consultation could have started earlier, which seems to be related to the initial status of the project as a local harm prevention project.

The service station industry peak body welcomed the proactive approach of the project promoting compliance in the industry instead of responding to a particular incident, and indicated that other jurisdictions showed some interest in the project and material developed.

The project targeted small independent service stations that were identified as an appropriate target because of their limited capability to comply. While inspectors recognised that some service stations visited didn't meet this criteria, most of them (82%) were actually small businesses. This demonstrates the effectiveness of the process used to identify sites, which relied on a combination of Fair Trading Fuel Check list, SafeWork notification data and an inspector's local knowledge. The level of compliance observed by inspectors among visited service stations confirmed that small service stations were less likely to have appropriate documentation, processes and systems in place than larger ones. Inspectors reported that small independent businesses were more likely to struggle with compliance requirements compared to businesses belonging to a franchise like Caltex where they can rely on the network's support for the service of pumps or air compressors.

Inspectors reported that they were not able to cover all service stations in their area. Many internal project stakeholders suggested turning the project into Business As Usual to allow for inspectors to progressively cover all service stations in regional and remote locations.

The whole site approach used for this project was considered appropriate for this particular target group that has limited contact with regulators. Instead of focusing on particular compliance areas, the inspector's audit tool covered all WHS aspects across a service station site. The Fair Trading checklist was added following the same logic across different regulators – however 9 visits conducted at the beginning of the project didn't include the Fair Trading checklist.

The project was successfully implemented, exceeding the target number of visits and providing a good practice audit tool

SafeWork inspectors visited 201 businesses as part of the project within the timeframe, one third more than the initial target of 150 visits by the end of June 2017. This represents 20 per cent of the total number of service stations in regional and remote New South Wales (986). Inspectors indicated that the visits took around two hours, ranging from 1.5 hours up to 3 hours for the service stations that had limited systems in place.

Most internal project stakeholders were very positive about the way the project was implemented, with the BRD Collaboration Award coming as a final recognition. Inspectors also reported a very positive experience of the project. They were particularly positive with the inspector's audit tool developed for the project and that was handed over to the business prior to the audit visit. Despite identifying some room for streamlining, inspectors welcomed the visuals and level of details included in the audit tool. Inspectors also felt that the approach taken to arrange the visit with a preliminary contact made with the business was appropriate considering the long driving distances required, but also to build a rapport with the business. Most inspectors reported that they would like using a similar approach in future projects.

The project directly improved businesses' compliance through notices issued and has the potential to generate further improvement through improved awareness

Most businesses interviewed described their experience of the visit received as positive; they felt that the advice provided was useful, the timing of the visit well managed, and the approach collaborative.

Through these visits, the project generated new intelligence for both regulators, SafeWork and Fair Trading, about businesses that had rarely or never been visited before. The data collected shows that service stations in regional and remote New South Wales have a low level of compliance with regard to the manifest and the emergency plan; however most service stations visited were well equipped and trained around fire-fighting equipment and first aid. The information collected through the Fair Trading checklist showed that the majority of businesses were already compliant with regard to price signage requirements and FuelCheck. Only 32 out of 192 businesses (16%) where the Fair Trading checklist was collected were referred for further inquiries.

Compared to previous SafeWork project in the same industry, businesses visited as part of the Regional and Remote Service Stations project had a lower level of compliance than businesses visited through the LPG decanting project across NSW in 2012-2013 with regard to the manifest (42% compared to 63% for the 2012-13 LPG project) and the emergency plan (47% compared to 82%). However, service stations visited as part of this project had a higher level of compliance when it comes to the fire-fighting equipment (87% compared to 77%) and first aid (90% compared to 84%). This is in line with some comments made by an inspector that businesses visited tend to have the right equipment in place, however are lagging behind in terms of documentation, processes and training.

A total of 207 notices were issued by SafeWork inspectors as part of this project. In line with other SafeWork projects conducted in the service station industry in previous years, the most frequent types of notices relate to hazardous chemicals (60%). Through the notices issued, the project had a direct impact on 54 businesses (27% of businesses visited) that had already fully (40) or partially complied (14) to notices issued; a further 12 businesses had notices issued but had not complied by the date of data extraction. Adding to that warning letters issued by Fair Trading that also requires mandatory action, the project directly improved compliance for a total of 76 businesses.

Beyond immediate corrective actions, the project improved businesses' awareness on safety issues. Most of the businesses interviewed reported that their level of confidence in meeting WHS

requirements has improved as a result of the visit. Businesses most frequently referred to their site plans and other key files to keep handy. The main limitation in improving compliance for these kinds of businesses are the costs associated with the compliance requirements. Despite being eligible for the small business rebate, businesses sometimes felt it was very little (up to \$500) compared to the costs incurred. A couple of internal project stakeholders also flagged that the high turnover in the industry also limited the impact of such actions in generating sustained compliance.

The collaborative component of the project was limited to the Fair Trading checklist with the main benefit being the efficient use of resources across regulators

Inspectors and internal project stakeholders were generally positive about the collaborative component of the project. It mainly took the form of the Fair Trading checklist collected by SafeWork inspectors on behalf of Fair Trading. SafeWork inspectors felt it was quite straightforward and not onerous. A few inspectors were less comfortable with the lack of clarity around the implications about what was happening with the data and the lack of authority to act on potential breaches.

Most internal project stakeholders didn't feel that more could have been done in terms of collaboration. Some joint visits were trialled in the initial stage of the project, but were not considered appropriate considering the limited extent of the collaborative component.

The main benefit identified from the collaboration is around the efficient use of resources across regulators, with Fair Trading in particular benefitting from "another set of eyes" through SafeWork inspectors. Some inspectors also identified benefits for themselves in terms of the knowledge they developed in another regulatory space (Fair Trading), but also job security. Internal project stakeholders who were exposed to more collaborative activities such as fortnightly project meetings reported some key benefits around the knowledge and understanding of the other agencies gained from working together. Some early evidence of positive flow-on effect was provided with stakeholders being willing to engage in collaborative activities following this positive experience.

However, the project didn't seem to make a clear difference for businesses in terms of customer experience. Only half of the businesses interviewed were aware that the visits involved components from two regulatory agencies. In terms of reducing the number of contacts with regulatory agencies, most businesses confirmed that they haven't had much contact in the past.

Some opportunities were identified for future collaborative projects with other regulators such as the EPA. While inspectors were generally supportive of including collaborative components in their visits, they were mindful of the requirements and implications in terms of expertise required, authority and impact on resources.

Recommendations

The evaluation generated two types of recommendations: firstly areas for improvement for the current project being turned into Business As Usual, and secondly recommendations for future collaborative regulatory projects. Detailed recommendations are provided at the end of the report.

Key areas for improvement in the current project relate to

- streamlining the audit tool
- ensuring continuous feedback to SafeWork inspectors about how the data they collected for Fair Trading is being used for each business visited.

Key recommendations for future collaborative regulatory projects include:

- early consultation and data analysis to inform the design of the project, in particular the industry to target
- appropriate consideration for balancing the contribution by the respective partner agencies across the different collaborative projects
- a project management checklist detailing key steps to follow, stakeholders to consult and documentation to produce at each stage
- sufficient training of inspectors (preferably face-to-face) about the collaborative component before implementation starts
- improving WSMS data protocols to facilitate evaluation and research analysis.

1. Introduction

1.1 The Regional and Remote Service Stations project

The Regional and Remote Services project is a project lead by SafeWork as part of the Commerce Regulation Program (CRP). The project was delivered between December 2016 and end of June 2017. Over this period a total of 201 audit visits were conducted by SafeWork inspectors in regional and remote New South Wales. As part of those visits, SafeWork inspectors collected data on behalf of Fair Trading about fuel pricing and octane signage.

1.1.1 Project design

The project targeted small independently owned service stations operating in regional and remote New South Wales. This industry was initially identified by the SafeWork Regional North team as an appropriate target because of significant non-compliance issues with work, health and safety (WHS) requirements, particularly relating to hazardous chemical storage, handling and use, manifests, emergency plans and workers compensation. Compared to their metro counterparts, regional and remote service stations were also less likely to have received a visit by a SafeWork inspector in the past.

The Fair Trading component was added to the project design when it was identified as an appropriate candidate for synergies between regulators under CRP.

1.1.2 Project objectives

The objectives of the project as identified in the CRP project plan are to

- support the Commerce Regulation Program objectives to make it easier for NSW businesses to comply and maintain workplace and consumer protections through:
 - collaborative regulatory activities that are customer-focused
 - Increased opportunities to share knowledge and expertise between government regulatory agencies
- build the capability of small independently owned Service Stations operating in regional and remote NSW, to comply with the various regulations, as it applies to:
 - storage, handling and use of hazardous chemicals
 - emergency preparedness
 - workers compensation insurance
 - fuel pricing and octane rating displays.

1.1.3 Program logic

The program logic below (Figure 2) outlines the overall rationale of the project.

A program logic is a core evaluation tool, which is essentially a one-page diagram that represents the ideal sequence of outcomes a program intends to achieve. It is a tool used to:

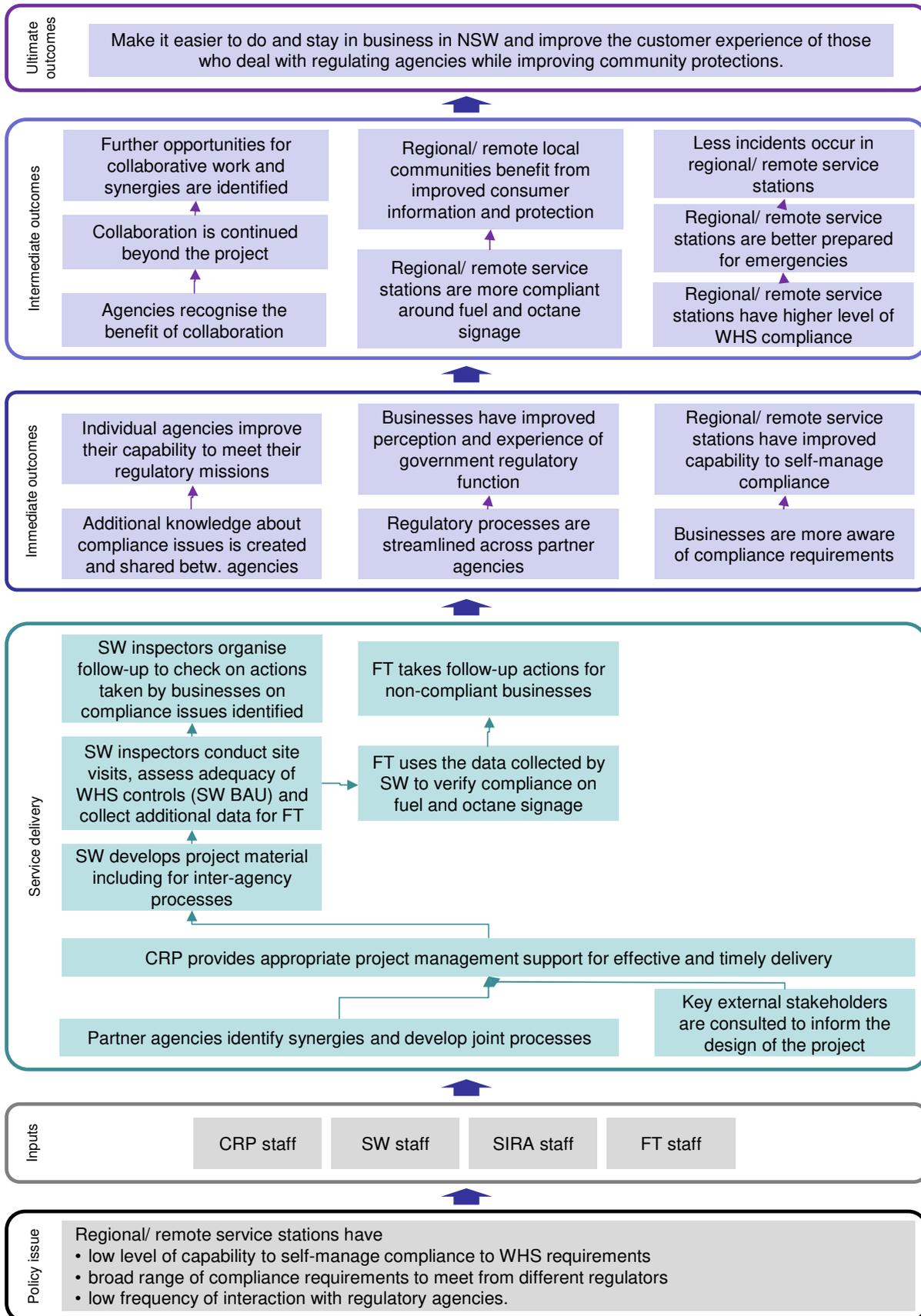
- clarify and communicate the rationale of a project and its intended outcomes
- make causal assumptions explicit
- provide a framework for monitoring and evaluation activities.

This type of program logic uses an ‘outcomes hierarchy’ approach that works from bottom to top, showing the initial policy issues or opportunities that triggered the project, the key inputs to the project, the project activities used to generate a series of immediate outcomes, which in turn generate intermediate outcomes, which ultimately contribute to long term outcomes which are CRP’s overarching goals.

The following program logic outlines the sequence of outcomes expected to happen through this collaborative project:

- developing new inspection material incorporating this collaborative aspect
- generating new intelligence about the sector
- improving service stations’ compliance, preparedness for emergency and customer experience of government interactions by these businesses.

Figure 2. Program logic



1.2 The evaluation

1.2.1 Purpose

The **purpose** of the evaluation is two-fold:

- assess the effectiveness of the project in achieving its specific objectives in relation to improving compliance and building the Work, Health and Safety capability of small independently owned service stations operating in regional and remote NSW.
- assess the effectiveness of the Commerce Regulation Program operating model for collaborative regulatory projects.

The scope of the evaluation is made of the 201 visits conducted as part of the project between December 2016 and end of June 2017.

The **intended use** of the evaluation is to:

- identify opportunities to turn the project into Business As Usual, while identifying areas for improvement in the design and the way the project is being delivered;
- inform the design of future collaborative projects under the CRP model;
- generate insights into the regional and remote service stations – which could be used to inform future SafeWork inspection efforts in this industry, as well as future CRP projects targeting service stations and expanding the scope of regulatory agencies involved.

1.2.2 Key evaluation questions

The evaluation answers 16 key evaluation questions across 4 evaluation area as identified in the evaluation plan (Table 1).

Table 1. Key evaluation questions

Evaluation area	Key evaluation questions	Section in the report where to find the answer
Appropriateness of the project design	1. To what extent does the project target important compliance issues in a critical industry?	2.2.4
	2. To what extent does the project target an area with some potential for synergies between regulatory agencies?	2.1.5
	3. How well did the development phase of the project allow for identifying the right industry/ compliance and synergy areas to focus on?	2.1

Evaluation area	Key evaluation questions	Section in the report where to find the answer
	4. How appropriate was the sites' selection process with regard to the project objectives?	2.2.2 and 2.2.3
Quality of implementation	5. Was the project implemented as intended?	3.1
Effectiveness of the project	6. How was the experience of visited service stations?	4.1
	7. To what extent did the project contribute to increased knowledge of partner agencies on the level of compliance (or lack of) among small independently owned service stations?	4.2
	8. What impact did the project have on compliance of visited service stations?	4.3.1
	9. To what extent did the project improve how prepared these service stations are for emergency situations?	4.3.2
	10. What impact (if any) did the project have on local communities?	3.1.2
Effectiveness of the CRP operating model for collaborative regulatory services	11. How was the experience of participating agencies (internal stakeholders)?	5.1.1
	12. What was the impact of the project on participating agencies' resources?	5.1.2
	13. What benefits did the CRP process generate for participating agencies compared to Business As Usual (BAU)?	5.2
	14. What were the benefits of the additional data being collected and shared across partner agencies?	4.2
	15. To what extent did the project improve collaboration between partner agencies?	5.2.1
	16. How successful was the project in generating synergies between participating agencies?	5.2.1

1.2.3 Evaluation methods

The evaluation design includes a process and an outcome evaluation component as reflected in the purpose of the evaluation and the key evaluation questions. The process evaluation assessed how well the project was implemented, with a particular focus on the inspectors' and businesses' experience. The outcomes considered by the evaluation are around the impact on the level of compliance among visited businesses and the impact of the collaborative component on inspectors and internal project stakeholders as well as on the businesses' customer experience.

The evaluation relied on a mix of qualitative and quantitative methods. Interviews were the core methods to unpack the experience of businesses, inspectors and key project stakeholders. Analysis of project data from Workplace Services Management System (WSMS), the SafeWork customer relationships management database, and Fair Trading data provided critical evidence about compliance issues encountered and the direct impact of the project on businesses' capability in this regard.

a) Document review

The evaluation considered key project documentation, firstly to develop a sound understanding of the project, and secondly to assess the appropriateness of the project design. Key project documents reviewed included:

- Prioritisation tool used to identify appropriate collaborative projects
- Evaluations of pilot projects
- Inspectors' resources: audit tool that includes the Fair Trading checklist, inspector briefing presentation
- Project reports from previous projects: 2009 Service Station Verification program, 2012-2013 LPG decanting project and 2015 Expired sites project
- Media coverage reports.

b) Site visit observation

The CRP Evaluation manager conducted a site visit observation on 9 May 2017 in the Merimbula region with a SafeWork inspector from the Bega office. On the day, two visits were conducted in Bombala and some initial contacts were made with other service stations in nearby towns for future visits.

The site visit observation helped to develop a practical understanding of what the visits – which are the core component of the project – involved; the time it took, the different steps followed, and the type of experience it would represent for the business and the inspector.

c) Interviews

Qualitative data from interviews provide evidence about the types of experience. Contrary to quantitative data, it is not possible to assess the *extent* of the feedback from qualitative data – frequencies are only indicative – qualitative data explores the *depth* of the evidence available.

A target of 53 interviews was initially anticipated with 30 business interviews, which however depended on the number of consent forms collected from visited businesses. A total of 40 interviews were conducted in the end including 16 interviews with businesses out of 26 consent forms received – the difference is explained by the usual drop-out in this case mainly due to difficulty to make contact and arrange an appropriate time. However more interviews than initially planned were conducted with inspectors (13 against an initial target of 10) and internal project stakeholders (10 against 9). Internal project stakeholders included members of the project team as well as key internal informants to the project design, as well as staff from the Customer Service

Centre. With regard to external project stakeholders, the initial target of 4 was over-estimated as less external stakeholders were ultimately considered in a position to have enough involvement in the project to be able to provide feedback (Table 2). Interviews were arranged internally between 9 June and 4 July 2017. They were mostly conducted over the phone and took between 20 minutes for businesses and 1 hour up to 1.5 hour with internal project stakeholders.

Table 2. Number of interviews, by type of stakeholder

Stakeholder type	Target number of interviews (evaluation plan)	Contacts provided	Interviews conducted
Businesses	30	26	16
Inspectors	10	31	13
Internal stakeholders	9	11	10
External stakeholders	4	1	1
Total	53	69	40

Interviews notes were then entered into an Access database to be able to extract the data collected question by question. The qualitative data was coded to identify key themes by order of frequency. For closed questions, the distribution of responses is reported as raw numbers, e.g. 6 inspectors out of 13 agreed on that, and not percentages because of the small number of respondents.

The analysis is reported in respective sections of the report to answer the key evaluation questions. Because of the focus on participant's experience, it was deemed appropriate to include a number of quotes to illustrate how participants report their experience in their own words.

d) Analysis of project data

Project data was mainly generated from WSMS. In addition, data was collected separately from Fair Trading about the particular actions and outcomes related to the Fair Trading checklist, and some data about business applications to small business rebates.

The extraction and cleaning of the WSMS data was coordinated by the project team regulatory officer. For the purpose of the evaluation, a data request was submitted to the Systems and Process Improvement (SPI) team. The data provided was de-identified, i.e. didn't include any business or individual names. The data extract provided included the following tabs:

- Action types
- Project questions, i.e. 9 questions from the inspectors audit tool that had been entered into WSMS
- Agreed actions from inspectors' reports
- Notices.

Some initial data cleaning was conducted. The Regulatory Project Officer requested officers to review their categorisation of businesses by size against some standard definitions (Table 3). Some verification was also done in relation to the use of the Not Applicable (N/A) response option for project questions, which appear to not always be appropriate.

Table 3. Business size categories definition

Business size category	Definition
Small	Business with less than 20 employees
Medium	Business with between 20 and 100 employees
Large	Business with over 100 employees
Network	Business owned and run by the network itself, e.g. Caltex, Coles
Franchise	Business under a network banner but owned by an individual. Also known as Dealer Owned Dealer Operated (DODO).

When it came to the data analysis, a key limitation was the absence of a unique identifier to link the various data tables. For the purpose of the evaluation, the business (or audit visit) was considered as the most appropriate unit of analysis. However WSMS doesn't include a de-identified unique identifier that would facilitate any data analysis. The Action Reference Number was considered as the most appropriate field to use as unique identifier; however, there can be several types of actions, not only the audit visit (Verification field) – other types of actions include: file note, follow-up visit, etc. So, the Regulatory Project Officer had to link any other types of actions to the reference Verification field, i.e. related audit visit, to be able to have a view by business/ audit visit. Similarly the data provided by Fair Trading and the Rebates team was linked to an Action Reference Number by the Regulatory Project Officer so that the dataset didn't include the business name.

1.3 Confidence in the findings

The evaluation team was able to implement the methods largely as intended. We are confident that the data collected provides a sound basis for the evaluation to draw robust conclusions about the project.

The number of interviews conducted is deemed appropriate to identify key themes in the experience of the project's participants.

With regard to the project data, the scope and quality of the data is considered good to very good overall. All visits were captured in WSMS including businesses responses to selected project questions. It is believed that this is not always the case: for example for the 2012-2013 LPG decanting project less than half of the audit visits had their audit tool returned and entered into WSMS (131 out of 268 visits). In terms of data quality, some checks and additional data cleaning were conducted with the critical support of the Regulatory Project Officer, reinforcing the confidence in the quality of the data.

The only limitation is that individual responses to project question 11 was not provided. This question captured the level of willingness and ability of the business visited as perceived by the inspector. The reason why this data was not provided by the SPI team is that it was based on the inspector judgement and considered as not necessarily factual. However, this data would have been particularly useful *for research purposes* (as opposed to compliance, investigation or enforcement purposes). In particular this would have helped testing the following hypothesis through robust statistical analysis: businesses qualified as willing and able are more likely to have received more agreed actions than notices compared to others. This would have helped confirm the approach taken by inspectors, and potentially support the development of training or tools to promote a consistent approach if appropriate.

Beyond the project data, the evaluation didn't consider incident data in the service station industry. This data, which was used in previous reports about SafeWork projects, comes with limitations: firstly it covers the whole industry without a breakdown by metro and regional/ remote areas, and secondly the low numbers of incidents make it difficult to identify trends. However, this is always a useful context indicator that we recommend to include as background information in future similar evaluations.

Finally, no evidence was collected on the impact of the project on the local communities, beyond the media coverage in regional newspapers.

2. Appropriateness of the project design

This chapter examines the design of the project, assessing the quality of the process that lead to designing the project in the initial stage, and the appropriateness of the resulting project design itself. In particular, it assesses to what extent the targeted industry – small independent service stations – is appropriate with regard to the project objectives in terms of industry compliance, collaboration and customer experience.

This chapter answers the following evaluation questions:

- How well did the development phase of the project allow for identifying the right industry/ compliance and synergy areas to focus on?
- To what extent does the project target important compliance issues in a critical industry?
- To what extent does the project target an area with some potential for synergies between regulatory agencies?
- How appropriate was the sites' selection process with regard to the project objectives?

2.1 The design of the project benefited from local knowledge and consultation with external stakeholders

All internal project stakeholders felt that independent service stations in regional and remote NSW were an appropriate target with regard to the project objectives around compliance. It was also considered an appropriate target with regard to the collaborative aspect, but to a lesser extent, the Fair Trading component being quite limited. A few stakeholders pointed out that the development phase of the project could have benefited from earlier and broader stakeholder consultation as well as more in-depth analysis of industry data.

2.1.1 The project was initiated from SafeWork Ballina regional office before becoming a CRP project

The Regional and Remote Service Stations project originated as a local harm prevention project before becoming a CRP project, which had some substantial implications in particular on the project management. As one internal project stakeholder put it, the status of the project shifted dramatically:

In our parlance, it jumped from the lowest level on the totem to the highest level on the totem, it jumped three of our levels: we have local harm prevention projects, then we have state-wide harm prevention projects, then we have high consequence low frequency, then above that focus on industry projects and top of the scale commerce regulation projects. It jumps from bottom to the top. [Internal project stakeholder]

The project was initiated by the SafeWork Ballina office in early 2016, which identified some recurrent compliance issues among small independent service stations, in particular following a

previous Notifications projects initiated under the SafeWork program High Consequence, Low Frequency. Audit visits of 8 small service stations had been conducted at this time as part of the Regional Harm Minimisation strategy. The evidence of these visits showed that the small independently owned service stations have significant non-compliance issues with WHS requirements, particularly relating to dangerous goods storage, handling and use, site safety plan, emergency plan and Workers' Compensation.

The project then became a Commerce Regulation project as it was identified as an appropriate candidate for a collaborative services project along with the Medium-Rise Construction and Tree Work projects. The Commerce Regulation Program (CRP) had commenced in February 2016 based on the September 2015 DFSI Cabinet concept paper¹ about establishing a Commerce regulator in New South Wales. The objective of the CRP is to deliver a new regulatory operating model that is easier for businesses to interact with government, reduces duplication and delivers high-quality regulatory services that protect communities, workplaces and consumers. The 2015 Concept Paper identified as one of the expected outcomes for the foundational activities “the collaborative delivery of some regulatory functions”. To identify appropriate collaborative projects, a prioritisation process was used based on the following criteria: problem frequency, problem magnitude, customer reach, business experience, operational efficiencies and agency alignment.

Once selected as a CRP collaborative services project, the requirements for the project management changed, in particular requiring broader consultation:

When it started as a local harm prevention project, we didn't need to go to major stakeholders, but as soon as it got spread state-wide, it was sensible to engage the state-wide stakeholders, which is what happened. But there was already some communications with rural fire service. [Internal project stakeholder]

Being selected as a CRP project was also perceived as a form of recognition for regional offices as one team member pointed out.

2.1.2 Stakeholders were generally satisfied with the process that informed the design of the project and the level of consultation

When asked about the process that lead to the design of the project, internal project stakeholders were generally satisfied with it.

The initial stage of the project involved consultation with internal and external stakeholders to refine the design of the project. Key external stakeholders consulted with included NSW Rural Fire Service, Fire and Rescue NSW and Australasian Convenience and Petroleum Marketers Association (ACPMA), the service station industry peak body. The level of consultation was ultimately considered as appropriate. In particular, the industry peak body welcomed having the opportunity to comment on the inspectors' audit tool. Feedback from the Field Practice Inspectors

¹ DFSI (2015) Establishing a Commerce Regulatory in NSW – Concept Paper, September 2015

Reference Group was also sought and incorporated in relation to authority for SafeWork inspectors to work on behalf of Fair Trading.

However, a few internal project stakeholders suggested that it should have started earlier in the process – which seems to be related to the initial status of the project as a local harm prevention project.

Stakeholders identified other areas for improvement in the design phase of the project:

- Broader internal consultation and review of previous projects in the industry at an early stage
- More in-depth analysis of baseline data (as available) to refine the targeting of the project.

2.1.3 Inspectors and internal stakeholders reported a consistent understanding of the project objectives

Inspectors as well as internal project stakeholders reported a consistent understanding of the project objectives. They identified the following key elements as constitutive of the project objectives:

- Provide information and advice to service stations to build their capability and improve their ability to meet compliance requirements
- Visit regional and remote businesses that have been rarely or never visited by regulators in the past
- Act on behalf of two regulators

Other secondary objectives reported by stakeholders included raising awareness of emergency services.

Most inspectors and internal stakeholders didn't feel that their understanding of the project objectives had changed over the course of the project. A few inspectors mentioned that the Fair Trading component wasn't initially covered in the beginning of the project.

Some internal project stakeholders specified that the objectives didn't really change, but the approach was refined along the way – which is in line with good project management practice. Examples include refinement to the audit tool used by inspector during their visits and the issue of underground tanks being referred to the NSW Environment Protection Authority (EPA).

2.1.4 The industry welcomed the proactive compliance approach taken by the project

The industry peak body noted that this project took a proactive approach in promoting compliance in the industry instead of responding to a particular issue, and was very supportive of it:

We do have an ageing infrastructure that was designed at compliance when it was first initiated, but the laws moved on and projects like this and particular results that are coming out are a very good way for people to go back and have a look. [External stakeholder]

An unintended positive outcome of this approach is that it raised interest in other jurisdictions as reported by the industry body:

Interestingly a lot of the comments came from other States: how much of this applies to us? Which is interesting, because a lot of it does, but the regulators aren't necessarily out there pursuing it. So, as feedback for you guys, you're not only leading the charge, but you're also having positive outcomes in other jurisdictions, which is quite nice to see. [External stakeholder]

2.1.5 The whole site approach was considered appropriate for this particular target group

The audit visits conducted as part of the project were designed following a whole-site approach: instead of focusing on particular compliance areas as it was the case in some previous SafeWork projects targeting the service station industry, the audit tool developed for this project covered all WHS aspects across a service station site. Previous projects targeted specific areas such as decanting of Liquefied Petroleum Gas (LPG) in 2012-2013. In 2009, the Service Station Verification Program also covered a range of compliance aspects, however it only focused on the greater Sydney metropolitan area. Compliance aspects checked included dangerous goods, manual handling, slips, trips and falls, robbery and violence, and workers' compensation and injury management. The whole site approach was considered appropriate to cover all compliance requirements at once to make the best use of regulators resources.

The Fair Trading component was added following the same logic across different regulators. However, most inspectors and internal project stakeholders felt that the Fair Trading component was quite limited. One internal project stakeholder also nuanced it by the fact that it was mainly beneficial to Fair Trading. Another one felt that opportunities for synergies were higher with the EPA:

There was probably a fairly limited cross-over with Fair Trading. Considering the work we've done around comprehensive guidance information about all the types of legal requirements a service station has to comply with, Fair Trading was a fairly small part of that. There was far more compliance requirements in the EPA compliance area than there was for Fair Trading. [Internal project stakeholder]

2.2 Small independent service stations in regional and remote NSW are an appropriate priority target for compliance activities

The project targeted small independent service stations in regional and remote NSW, which was considered appropriate by all inspectors and internal project stakeholders interviewed. The process used to identify appropriate sites allowed inspectors to mostly visit small service stations as initially intended. Inspectors relied on a combination of data from Fair Trading, GLS (NSW Government Licensing System), and their own local knowledge. The small service stations visited had a lower level of compliance compared to other ones, which confirmed that it was an appropriate target with regard to compliance needs.

2.2.1 All internal stakeholders felt that small independent service stations were an appropriate industry group to target

Small independent service stations in regional and remote NSW were initially identified as an appropriate target because of the lower level of compliance observed in areas where risks associated are high (storage and handling of hazardous chemicals). The location and size of these service stations make them less likely to have appropriate awareness and knowledge. This was also reflected in the lack of formal processes and systems in place as highlighted by a SafeWork inspector:

[There is a] perception that the small stakeholders out there are behind the ball in terms of processes, and systems in place compared to the big players like BP. [SafeWork inspector]

Another factor is that local emergency services wouldn't be able to provide the same level of professional and timely response when an incident occurs. Emergency services are mostly run by volunteers in regional and remote NSW.

At the end of the project, all internal project stakeholders confirmed that small independent service stations were an appropriate target considering the project objectives. It was considered an appropriate target primarily with regard to compliance needs and the lack of prior coverage by the regulators.

2.2.2 Inspectors identified the sites to visit based on a list provided by Fair Trading and their own knowledge of the local area

Inspectors were initially provided with a list of service stations in their respective regions to select appropriate sites from. The list was pulled together based on a Fair Trading list of all service stations on FuelCheck across New South Wales. Inspectors were also able to use data GLS around notified hazardous chemicals with some filtering applied to remove the big players.

Inspectors confirmed having used the list provided based on Fair Trading data as a starting point – which can be identified as an initial benefit from the collaborative approach. In addition, they used their local knowledge or “drove around” by areas “to pick sites that were out of the way” and may not be on the list. Some inspectors also reported having consulted internally to avoid visiting businesses that could have been visited recently.

2.2.3 Most businesses visited were small independent service stations as initially intended

Most of the businesses visited (82%) were small independent businesses. Some inspectors and internal stakeholders recognised that a few of the visited service stations were of a larger size, franchisees or belonging to a network, in particular towards the end of the project. This is confirmed by the data: 37 out of the 201 business visited didn't belong to the small business category (Table 4).

Table 4. Businesses visited by size

Business size category	Businesses visited	
	n	%
Small	164	82%
Medium	24	12%
Large	2	1%
Network	7	3%
Franchise	4	2%
Total	201	100%

One internal stakeholder explained that it is sometimes difficult to identify small independent service stations without going to the site, with the business owner itself sometimes being unclear:

There was no way to identify that without going to the site. Didn't always get the ones we were looking for, but very hard to sort it out without going to the site. A lot of the time the PCBU [Person Conducting a Business or Undertaking, i.e. business owner] themselves had limited knowledge of it, there may be a file there from Liberty fuel or someone like that, but they never actually opened it and knew what was in the file. [Internal project stakeholder]

While being able to achieve or even exceed the number of target visits, some inspectors reported that there are many more small independent service stations that they were not able to cover, and advocated for the project to become Business As Usual. With 201 service stations visited, the project covered 20 per cent of the 986 service stations in regional and remote NSW according to the list of service stations in NSW generated from FuelCheck (Table 5). This is indicative of the remaining service stations not covered, although a number of them belong to a network or are franchise, therefore would reduce their needs in terms of compliance support.

Table 5. Number of service stations in New South Wales, by remoteness

Remoteness	n	%
Metro	1,210	55%
Regional	950	43%
Remote	36	2%
Total	2,196	100%

2.2.4 Small service stations generally had lower level of compliance compared to other types of service stations

With inspectors also visiting some larger service stations, it is possible to compare the level of compliance between the small service stations and the larger ones. In 6 out of the 8 questions from the audit tool recorded in WSMS, small service stations had a lower level of compliance compared

to larger ones. Small businesses had a higher level of compliance only with regard to training around the use of fire-fighting equipment and the number of first aiders (Table 6). The difference was more important with regard to the location of the safety manifest and having an emergency plan, both of those elements presenting substantial risks in case of an incident.

Table 6. Level of compliance against some project questions, by business size category

Audit tool question	Small (n=164)		Other business size categories (n=37)	
	Yes	%	Yes	%
Does the PCBU have a compliant & up to date manifest?	65	40%	19	51%
Is the manifest located in a position agreed to by NSW Fire & Rescue?	57	35%	28	76%
Does the PCBU have a satisfactory (documented) Emergency Plan in place?	69	42%	25	68%
Would the PCBU be able to initiate that plan if an emergency occurred?	91	55%	24	65%
Does the PCBU have adequate & properly maintained fire-fighting equipment on site?	135	82%	32	86%
Are an adequate number of persons satisfactorily trained in the use of that fire-fighting equipment?	119	73%	22	59%
Does the PCBU have sufficient & properly maintained first aid equipment?	145	88%	36	97%
Does the PCBU have access to an adequate number of first aiders?	124	76%	25	68%

Note: Percentages reflects the number of businesses the compliance requirement was marked as met (True) in WSMS out of all businesses for whom a response was provided (True and False, excluding N/A)

3. Quality of implementation

This chapter assesses the quality of the project delivered, in particular against the initial project plan, timeline and targets, but also according to inspectors based on their experience with other similar projects. It answers the following evaluation question:

- Was the project implemented as intended?

3.1 The project was successfully implemented, exceeding the number of target visits

3.1.1 With 201 visits conducted, the project exceeded the initial target of visits by one third

The implementation of the project kicked off with the inspector briefing held in December 2016 and with an initial target of 150 visits by the end of June 2017. The project was completed at the end of June 2017 with a total of 201 visits being conducted, over a third more than the initial target, which shows the commitment of inspectors to the success of the project. One internal project stakeholder mentioned that the timing of the project may have contributed to that, with the restructure that occurred in SafeWork at that time bringing additional resources to the visits in local offices: some district coordinators became inspectors and had the opportunity to conduct a number of visits.

Two thirds of the visits were conducted in the Regional South Division. Most offices in both regions either reached their targets or exceeded it. Two offices made a key contribution to the project: the Bega office and the Ballina office from where the project originated (Table 7).

Table 7. Visits completed against initial target, by region

Region	Target	Visits completed	% of visits completed
RSD North	58	69	34%
Ballina	12	23	11%
Coffs Harbour	12	14	7%
Narrabri	11	11	5%
Port Macquarie	12	9	4%
Tamworth	11	12	6%
RSD South	92	132	66%
Albury	12	18	9%
Bega	11	38	19%
Dubbo	12	10	5%
Goulburn	12	16	8%
Griffith	11	9	4%
Nowra	12	19	9%
Orange	11	11	5%
Wagga Wagga	11	11	5%
Total	150	201	100%

Most internal project stakeholders were very positive about the way the project had been delivered. The BRD Collaboration Award came as a final recognition of all the efforts put in by the project team and the inspectors.

The project team had phone meetings every two weeks over the course of the project with the support of the Commerce Regulation staff and resources. Although the overall project was delivered in line with the initial timeline, one internal project stakeholder felt that future similar projects could benefit from clearly identifying the different steps, documents and persons to consult with over the course of the project. Such a project audit tool would be beneficial to staff members who are less familiar with this kind of project management approach.

3.1.2 The industry and local communities were informed about the project through targeted communication activities

The project primarily relied on existing networks to promote the project. In particular, the project benefited from SafeWork’s good relationship with the industry peak body, Australasian Convenience and Petroleum Marketers Association (ACAPMA). The association used their communication channels to provide information about the project to their members and even beyond. These channels include an industry news website and a weekly newsletter (8,000 subscribers and 14,000 on the safety alert). Providing early information and resources to the

industry, in particular the inspector’s audit tool, was identified as a way to improve the customer experience by alleviating the general fear that comes with a visit from a regulator:

Any time we get advanced notice of a project such as this and the ability to communicate it out to members, we do calm that fear factor that members would feel with an inspector turning up [External stakeholder].

In addition to that, there was some communication through regional press and online media to bring awareness of the project to the local communities in regional and remote New South Wales (Table 8). However no evidence was collected on the impact of the project on the local communities.

Table 8. Overview of media activities about the project

Date	Channel	Media	Location	Audience
06-Mar-17	Online	Safetyculture.com.au		
07-Mar-17	Press	Illawarra Mercury	Wollongong	11,703
24-Mar-17	Online	Great Lakes Advocate	Taree and Foster	
27-Mar-17	Radio	Max FM 12.00 News	Taree and Foster	
29-Mar-17	Press	Great Lakes Advocate	Forster	3,706
03-Apr-17	Press	WIN Wagga, Win News	Wagga	

3.2 Inspectors were very positive about the audit tool and the approach followed for the visits

Inspectors reported overall a very positive experience of the project. They were particularly positive about the audit tool developed for the project that was handed over to the business prior to the audit visit.

3.2.1 The audit tool developed for the project was identified as a best practice example

When asked about the one thing they would not change in the design of the project, most inspectors referred to the audit tool. In particular, they welcomed the visuals and level of details. Some inspectors reported that they would continue using it to visit service stations beyond the project. Positive comments about the tools included:

Was probably one of the best practice examples in the past. [SafeWork inspector]

Learn best with pictures [SafeWork inspector]

Benefits really came from the thoroughness of the information [SafeWork inspector]

Some inspectors felt that the tool was too long and identified ways to streamline it, by identifying priority areas or clearly distinguishing what is required by the legislation and is enforceable from what relates to codes and standards and is good practice.

Could have been shorter to some extent or more user-friendly by focusing on what is critical, instead of focusing on everything. Focus on the priorities, and if there was time, look at the colours of the dip points, some things that are a bit obsolete. Not saying that they shouldn't be asked about that, but as a business, the more important things are the signage, the training, the emergency plan, etc. [SafeWork inspector]

Need to clarify what regulations are enforceable and go through what codes / standards are required as a separate section, e.g. notification, emergency situation could have what the legislation requires, and then what standards are recommended [SafeWork inspector]

In the same vein, one inspector suggested that identifying key compliance areas would make it easier for inspectors as well, to clearly distinguish what would trigger a notice compared to agreed actions. This would help ensure consistency in the approach followed by inspectors, which was raised as a potential risk by internal project stakeholders.

The audit tool should identify half a dozen areas where compliance is required by a service station and where a notice would be triggered and other areas that would only generate agreed outcomes e.g. up to date manifest box, emergency management plan, Fire rescue. This would provide inspectors with clarity on when to issue a notice and when to establish agreed actions with the PCBU. [SafeWork inspector]

Other areas of improvement relate to

- Formatting of the document (e.g. doesn't have page numbers)
- Wording of some questions that can be confusing (e.g. questions with multiple requirements combined, wording with double negatives or questions depending on the answer to a previous questions).

As a follow-up to the project, the project lead expressed some interest in developing an online version of the tool that would be made available to any appropriate businesses. It was not possible for inspectors to use the tool on a tablet during the visit because no electronic devices can be used around hazardous chemicals; however there would still be benefit of having an electronic version for businesses to access in the future.

Another area to consider exploring is to expand the scope of the audit tool to the EPA.

3.2.2 Visits took around two hours, with most inspectors making an initial contact to make an appointment and provide the audit tool

Inspectors indicated that the visits took around two hours, ranging from 1.5 hours up to 3 hours for the service stations that had limited systems in place. A few inspectors also reported that the first visits they did took longer as they were getting accustomed to the inspector's audit tool.

An example of a visit process as observed include the following steps, which were organised logically around the service stations site, i.e. starting with reviewing documentation, then going through the site physically:

1. Dangerous goods licence/ hazardous chemicals manifest (legislation changed in 2005, moving from a licence to a notification system, then from hazardous substances and dangerous goods to hazardous chemicals in 2012)
2. Emergency plan, notified to Fire & Rescue NSW (not only NSW Rural Fire Service who are mainly volunteers)
3. Personal safety (e.g. robberies)
4. Fair Trading: price signage
5. Emergency services information cabinet
6. Training: fire extinguishers, first aid kit
7. Bowsers (no latching), vents
8. Fair Trading: FuelCheck registration
9. Electricity: Residual Current Device (RCD)

When asked about what they did differently as part of the project, many inspectors referred to making an initial contact with the business to identify a suitable day for the audit visit and provide the self-audit tool in advance. Inspectors felt that this initial contact contributed to build a rapport with the business, being open and transparent about the approach, and giving the business the opportunity to make improvements prior to the visit. A few inspectors commented also that they spent more time than usual in preparing for this project, by going through the audit tool, the related legislation or seeking advice from Fair Trading inspectors about the FuelCheck and price signage aspects.

Most inspectors interviewed reported that they would like to continue using a similar approach in future projects, in particular in terms of making an appointment for the visit and providing the audit tool in advance. While being aware that some projects may require a compliance enforcement approach, inspectors felt that making this initial contact was particularly appropriate in regional areas.

Previous reviews of pilot collaborative projects conducted in June 2016 actually identified the following issue: 'lack of warning to allow for the right business representative to be made available on the day of the visit'. This issue seems to have been addressed through the approach followed for this project. Internal projects as well as inspectors confirmed that unannounced visits wouldn't work in a regional context.

3.3 Some areas for improvement were identified, mainly around internal processes and systems

Some other recommendations from previous projects were tested with inspectors and internal project stakeholders:

- Need for a single document recording system (TRIM): some inspectors found it being a good idea, but others were more balanced, identifying that not everyone uses TRIM or that such a change would require a lot of resources.
- Need for a single data recording system: again this recommendation appeared as a good idea in theory ('a streamlined WSMS across the organisation'), to promote data sharing across the organisation, however the implementation would generate substantial issues around data access on top of existing issues around speed of access and downloading. One inspector commented:
In the regions, you can turn TRIM on and drinks 3 cups of coffee, it's slow as a wet week, I tend to send it to email. [SafeWork inspector]
- Need for a joint staff directory across partner agencies: some inspectors found that a great idea, but others as well as some internal project stakeholders felt that the existing tools (Hugo and DFSI Intranet directory) were sufficient – although not perfect.
- Opportunity to develop a referral process for inspectors doing the visits to refer issues identified to appropriate agencies: this was considered as the most appropriate recommendation by inspectors. Some internal project stakeholders specified that some work started around this, through the Champions Working Group or with the EPA.

Some inspectors and internal project stakeholders felt that the consent process was too cumbersome. Businesses were asked to read a whole page and sign a declaration on the spot which added some more time to the visit.

A few inspectors suggested that more training could have been provided beforehand about the audit tool and the Fair Trading component.

4. Effectiveness of the compliance approach

This chapter assesses the effectiveness of the project in terms of improving the level of compliance in the targeted industry, or at least its knowledge, awareness and ability to self-comply. It answers the following evaluation questions:

- How was the experience of visited service stations?
- To what extent did the project contribute to increased knowledge of partner agencies on the level of compliance (or lack of) among small independently owned service stations?
- What impact did the project have on compliance of visited service stations?
- To what extent did the project improve how prepared these service stations are for emergency situations?

4.1 **Businesses interviewed generally reported a positive experience of the project**

Most businesses interviewed described their experience of the visit received through the project as positive. Out of the 16 businesses interviewed, most of them found that

- The inspector provided useful advice (10 businesses said so)
- The timing of the visit was well managed (8)
- Collaborative (8)

Some businesses commented positively on the approach and attitude of the inspectors, who were described as “friendly”, with a “nice personality” and “made them comfortable”. One of the businesses also commented on the importance of receiving such visits in remote areas:

Being out in a little country town isolated I really think visits are good from SafeWork and other people and would like to see more contact, more information. [Business]

All businesses interviewed agreed that:

- They were treated fairly
- They had valuable and worthwhile interactions during the visit
- The inspector recognised their efforts in managing WHS and Return to Work
- The visit increased their confidence in approaching WHS and Return to Work
- The inspector had enough knowledge to address issues.

In a follow-up email, one of the businesses visited commended the process following the visit, with the inspection report identifying agreed actions and notices to act upon:

We are not too familiar with working with the regulator in New South Wales. We do commend the process SafeWork NSW regarding simplicity and clarity regarding entry reports and improvement notices. [Business]

The majority of businesses said there was nothing negative about the visit (10 out of 16). The only negative comments related to:

- The costs of the equipment required to comply (mentioned twice)
- Constant changes in the regulation (1)
- Providing the same information to multiple regulators (1)
- Conflicting advice provided by their own manager (1)

4.2 The project generated new intelligence about the level of compliance among rarely visited businesses

Because of the location of the visited service stations in regional and remote New South Wales, these types of businesses were less likely to have been covered through previous inspections or projects, and thus being captured into SafeWork or Fair Trading data intelligence compared to metropolitan areas. Therefore the evidence collected is either completely new, i.e. no prior contact, or at least much more up-to-date and with a broader coverage than what was available previously. This is particularly true for Fair Trading that has much less inspectors in regional offices.

The following section provides an overview of the evidence gathered and how it compares to the evidence previously available. This new evidence is now available for both regulators to inform future inspections and projects targeting service stations in regional and remote New South Wales.

4.2.1 The project provided the opportunity to get a clear picture of the level of compliance among service stations in regional and remote New South Wales

The information collected by SafeWork inspectors against the project questions shows that service stations in regional and remote New South Wales have a low level of compliance with regard to the manifest and the emergency plan; however most service stations visited were well equipped and trained around fire-fighting equipment and first aid (Table 9).

Table 9. Level of compliance against some project questions

Audit tool question	Yes		No		Total		N/A
	n	%	n	%	n	%	n
Does the PCBU have a compliant & up to date manifest?	84	42%	115	58%	199	100%	2
Is the manifest located in a position agreed to by NSW Fire & Rescue?	85	43%	114	57%	199	100%	2
Does the PCBU have a satisfactory (documented) Emergency Plan in place?	94	47%	107	53%	201	100%	0
Would the PCBU be able to initiate that plan if an emergency occurred?	115	57%	86	43%	149	100%	0
Does the PCBU have adequate & properly maintained fire-fighting equipment on site?	167	83%	34	17%	201	100%	0
Are an adequate number of persons satisfactorily trained in the use of that fire-fighting equipment?	141	70%	60	30%	201	100%	0
Does the PCBU have sufficient & properly maintained first aid equipment?	181	90%	20	10%	201	100%	0
Does the PCBU have access to an adequate number of first aiders?	149	74%	52	26%	201	100%	0

Inspectors reported that small independent businesses were more likely to struggle with compliance requirements compared to businesses belonging to a franchise like Caltex where they can rely on the network’s support for the service of pumps or air compressors. When observing some site visits, a couple of business owners mentioned that they were “about to close” mainly because of the reduction in sales: one owner who also had a motor dealership reported that he was selling 60 vehicles a year and now only 6. In this context, the regulatory requirements were perceived by these owners as an unnecessary onus on businesses that are already struggling.

The project was also an opportunity for Fair Trading to obtain some evidence about the level of compliance of service stations in regional and remote areas that are very rarely covered by Fair Trading inspectors. The information collected by SafeWork inspectors through the Fair Trading checklist showed that the majority of businesses were compliant with regard to price signage requirements and FuelCheck.

All this new intelligence has already been acted upon by SafeWork and Fair Trading: as part of the project, SafeWork inspectors issued a total of 1,393 actions across 178 businesses (23 didn’t have any, i.e. 11% of businesses), 207 notices across 66 businesses (135 didn’t have any, i.e. 67% of businesses) and Fair Trading referred 32 businesses (for further inquiry. Further details about these actions are provided in section 4.3.1.

4.2.2 The data collected contribute to the knowledge base of the industry accumulated over previous SafeWork projects

In recent years, SafeWork conducted some other projects targeting the service stations industry. While they varied in scope and focus, some of them had similar project questions – although worded slightly differently – that provide a useful point of comparison. A project targeting decanting of LPG was conducted between July 2012 and December 2013 with 268 verification visits being accounted for in WSMS. Table 10 shows that businesses visited as part of the Regional and Remote Service Stations project had a lower level of compliance than businesses visited through the LPG project with regard to the manifest (42% compared to 63% for the 2012-13 LPG project) and the emergency plan (47% compared to 82%). However, service stations visited as part of this project had a higher level of compliance when it comes to fire-fighting equipment (87% compared to 77%) and first aid (90% compared to 84%). This is in line with some comments made by an inspector that businesses visited tend to have the right equipment in place, however are lagging behind in terms of documentation, processes and training.

Table 10. Comparison of level of compliance with some similar project questions from previous projects in the service station industry

2012-13 LPG decanting project			2016-17 Regional and Remote Service station project		
Project question	Total n	Yes %	Project question	Total n	Yes %
Is there a compliant manifest onsite?	63	63%	Does the PCBU have a compliant & up to date manifest?	199	42%
Has an emergency plan been prepared, maintained and implemented?	117	82%	Does the PCBU have a satisfactory (documented) Emergency Plan in place?	201	47%
Is the fire protection and fire-fighting equipment adequate? [WHS Reg 2011, Clause 359]	69	77%	Does the PCBU have adequate & properly maintained fire-fighting equipment on site?	201	83%
Is appropriate First Aid provided? [WHS Regulation 2011, Clause 42]	115	84%	Does the PCBU have sufficient & properly maintained first aid equipment?	201	90%

The analysis of notices issued as part of the project offers another point of comparison with previous SafeWork projects targeting the service stations industry. Since 2009, three other projects that also targeted the industry but with varying scope and focus were documented in a project report allowing for comparison:

- In 2009, the Service Station verification program targeted service stations across New South Wales with a broad approach similar to the one followed by the present project – although with a different geographic coverage.

- In 2012-2013, the LPG decanting also targeted the industry but with a specific focus on decanting of LPG following a series of fires in NSW that were a result of unsafe systems of work for the decanting of LPG.
- In 2014-15, the Expired Sites project targeted service stations across New South Wales with a particular focus on Dangerous goods and Abandoned underground fuel storage tanks.

Table 11 shows the number of notices issued for each of the four projects including the Regional and Remote Service Stations project. For all four projects, most notices were Improvement notices with only the LPG decanting project issuing Prohibition and Penalty notices due to the risks associated. However it is interesting to note the difference in the ratio of number of Improvement notices to visits: the Regional and Remote Service station project has the smallest ratio, very close to 1:1 with 200 Improvement notices generated from 200 visits. This compares to 3.3:1 for the Service Station Verification program conducted in 2009. However, interpreting this difference is a difficult task as it is related to a number of factors: the change in the industry since 2009, the difference in geographic coverage between the two projects and potentially the more capability building type of approach taken by inspectors as part of the present project.

Table 12 shows that dangerous goods/ hazardous chemicals have been a constant focus for SafeWork inspections in recent years, due to the level of risks and the potential impact on the local community. This is reflected in the number of improvement notices. These types of notices made up 60 per cent of the Improvement notices for the Regional and Remote Service Stations project.

Some anecdotal evidence from inspectors can contribute to increased intelligence of the industry. One inspector for instance identified an emerging issue with business owners starting to maintain their fuel bowsers themselves:

Previously a lot of service stations, their fuel bowsers were owned by the person providing the fuel, e.g. Caltex, they come and check the bowser, now not doing that anymore, we're giving you the system, it's up to you to maintain it. They're starting to do the repairs themselves. It's a concern to me. [...] Unless they're selling a certain amount of fuel, the fuel suppliers are saying 'you're on your own', you're not giving us enough money for us to provide you this service. [SafeWork inspector]

Table 11. Number of notices issued in recent SafeWork projects, by notice type

Project	Service Station Verification program	LPG decanting project	Expired Sites project	Regional and Remote Service stations project
Dates	Jun-Nov 2009	Jul 2012-Dec 2013	2014-15	Dec 2016-Jun 2017
Geographic coverage	Greater Sydney	Whole NSW	Whole NSW	Regional and remote NSW
Industry scope	60% independent, 40% large			Small independent
Focus	Whole site	LPG decanting	Dangerous goods Abandoned underground fuel storage tanks	Whole site
Number of visits	164	268	276	201
Notice type	n	n	n	n
Improvement notice	542	392	331	200
Workers compensation	56	42	9	7
Prohibition notice	0	12	0	0
Penalty/ Infringement Notice	0	2	0	0
Confirmation of Advice Records (CARs)	45	NA	NA	NA
Total	54	448	340	207
Ratio Improvement notices / Visits	3.3	1.5	1.2	1.0

Table 12. Top 10 Improvement notice types in recent SafeWork projects

Project	2009 Service Station Verification Program			2012-2013 LPG decanting			2017 Regional and Remote Service stations project		
Visits	164			268			201		
Improvement notices	542			392			200		
Top 10	Reason	n	%	Reason	n	%	Reason	n	%
1	Risk Assessment	78	14%	Hazardous chemical register	50	13%	Hazardous chemicals - manage risks	45	23%
2	DG/HS Register	58	11%	Manifest of hazardous chemicals	49	13%	Hazardous chemicals - emergency plans	32	16%
3	Manifest	53	10%	Duty to prepare, maintain and implement emergency plan	40	10%	Hazardous chemicals - register	24	12%
4	Emergency Arrangements	43	8%	Person conducting business or undertaking to obtain and give access to safety data sheets	29	7%	Electrical - inspection / testing	7	4%
5	MSDS	34	6%	Management of risks to health or safety- hazardous chemicals	29	7%	Emergency plan - must prepare	7	4%
6	Training, Instruction & Information	28	5%	Emergency plans	27	7%	Hazardous chemicals - emergency equipment	7	4%
7	Plant Maintenance, Pressure Vessel	24	4%	Regulator must be notified if manifest quantities to be exceeded	25	6%	Hazardous chemicals - safety data sheets	6	3%
8	Dangerous Goods Notification	23	4%	Protecting hazardous chemicals from damage	20	5%	Electrical - residual current devices	6	3%

Project	2009 Service Station Verification Program			2012-2013 LPG decanting			2017 Regional and Remote Service stations project		
9	Plant Maintenance. Vehicle Hoist	23	4%	Fire protection and firefighting equipment	18	5%	Fire and explosion - specific controls PCBU - Improvement	5	3%
10	Ignition Sources In Hazardous Areas	17	3%	Outer warning placards— requirement to display	12	3%	Emergency plan - inadequate emergency plan	3	2%

4.3 The project improved compliance on critical risk areas through notices issued and has the potential for sustained improvements

The project had a measurable impact on compliance for 76 businesses who received notices or Fair Trading warning letter. Notices issued by SafeWork inspectors as well as Fair Trading warning letters require mandatory action from the business. In addition, the project has the potential to have a long-lasting impact by having improved business awareness of safety issues and ability to self-comply.

4.3.1 The project already demonstrated some measurable impact on the level of compliance among visited business

The first level of impact the project had on businesses compliance was during the visit itself, with some businesses fixing some of the issues straight away:

There were a couple of issues in my service station which I fixed straight away like petrol pumps on floor that shouldn't be touching on the floor. [Business]

Then, the visits had an impact on business compliance through the agreed actions and notices issued by inspectors. Less than ten per cent of businesses (9%) didn't receive any agreed actions nor notices, implying that their level of compliance was considered as satisfactory. The majority (58%) only received agreed actions that don't require a mandatory response from the business (Table 13).

Table 13. Type of actions taken by inspectors by business visited

Actions taken	Businesses visited	
	n	%
Neither agreed actions or notices	19	9%
Agreed actions only	116	58%
Agreed actions AND notices	62	31%
Notices only	4	2%
Total	201	100%

Out of those who received actions, more than two thirds received between 1 and 10 actions (Table 14). The impact of agreed actions is difficult to measure as it doesn't require a mandatory response from the business. However most of the inspectors interviewed felt that the service stations visited had improved their level of compliance as a result of the visit: 9 out of 11 responded positively, one negatively and one was not sure. They were able to notice improvements made through follow-up visits to businesses. As part of the project, 78 follow-up visits were conducted, representing 39 per cent of businesses visited. One business even reported that some of the actions he had taken were used by the inspector as an example for other visits. To measure the extent of sustained

change would however require monitoring over time, for instance through other follow-up visits by inspectors.

Table 14. Number of agreed actions by businesses visited

Number of agreed actions	Businesses visited	
	n	%
0	23	11%
1 to 5	68	34%
6 to 10	70	35%
11 to 15	24	12%
16 to 20	9	4%
21 and over	7	3%
Total	201	100%

Issuing notices had a more direct and measurable impact on a business' level of compliance as it requires a response from the business. A total of 66 businesses received Improvement or Workers compensation notices, most of them receiving between one and three notices (Table 15). Most notices issued related to hazardous chemicals (see section 4.2.2, Table 12).

Table 15. Number of notices issued by business visited

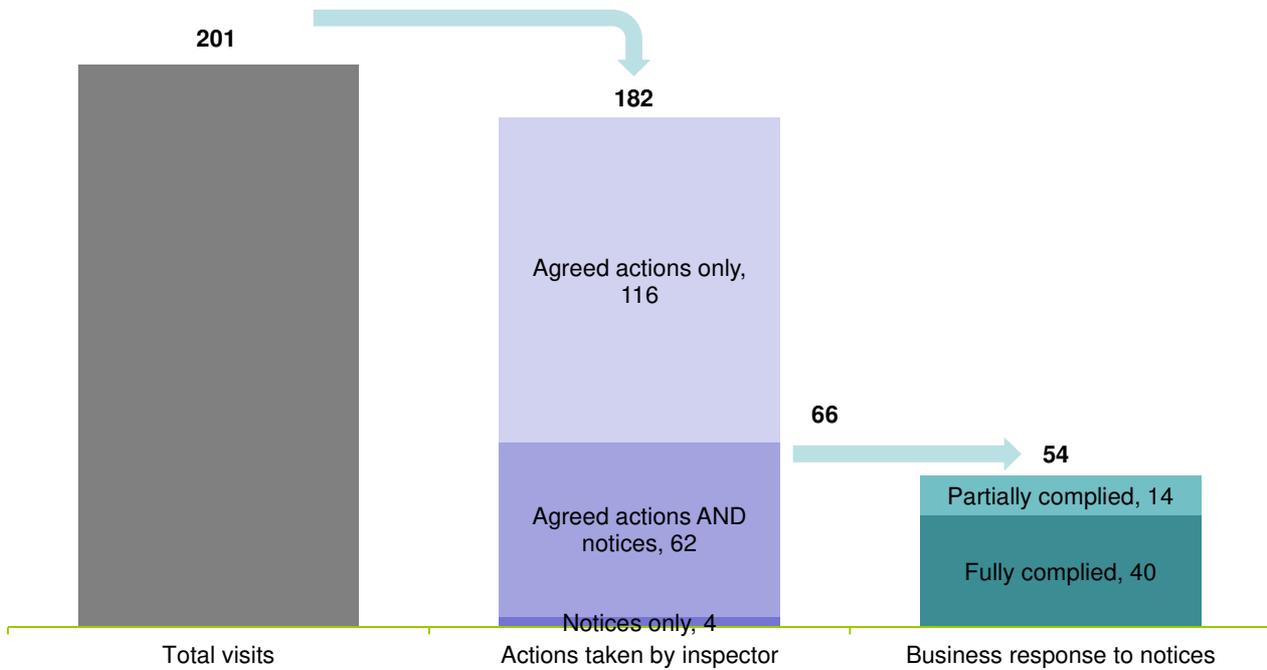
Number of notices issued	Businesses visited	
	n	%
0	135	67%
1 to 3	39	19%
4 to 6	25	12%
7 to 10	2	1%
Total	201	100%

When comparing statistically the number of notices and agreed actions issued for small businesses versus for other types of businesses, there was no clear difference, i.e. statistically significant. This means that we cannot conclude with certainty that small businesses have a lower level of compliance than other businesses as measured by the number of agreed actions or notices issued.

Out of the 66 businesses issued with a notice, 54 had fully complied (40) or partially complied (14) with all notices as at 17 July 2017 (Figure 3). However, ultimately all businesses issued with a notice will have to comply (at this date 12 had not yet complied). As a consequence, it is possible

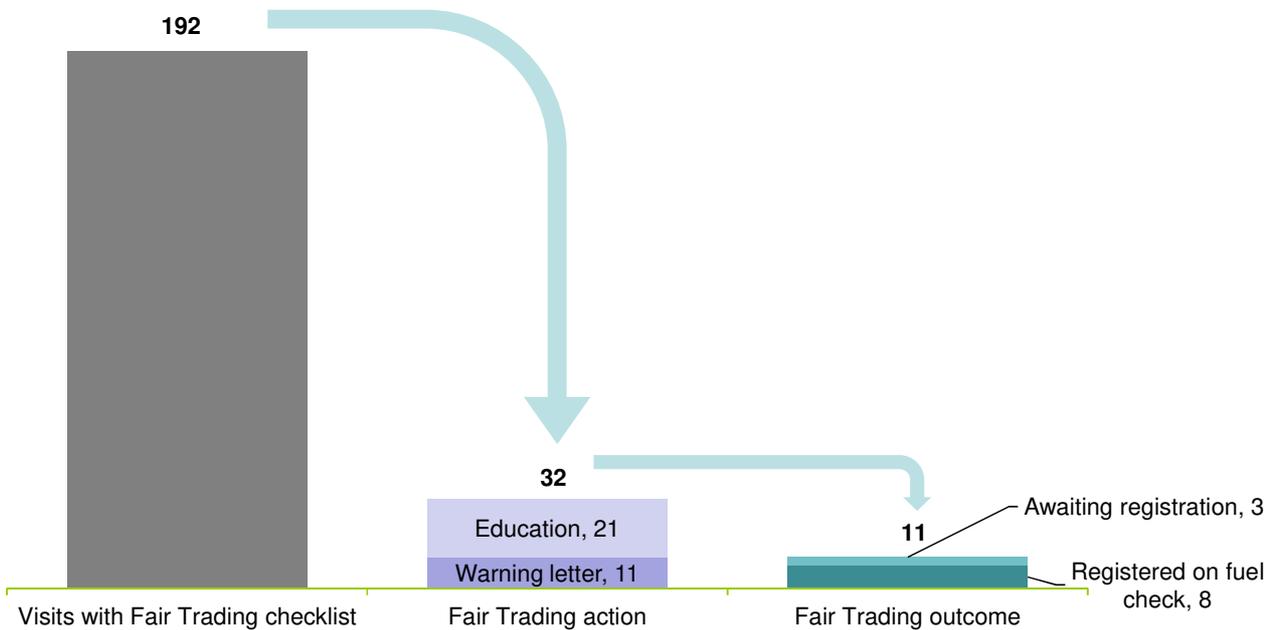
to conclude with certainty that the project improved compliance for at least 54 businesses, i.e. over a quarter (27%) of the businesses visited.

Figure 3. Overview of the actions taken by SafeWork inspectors (agreed actions or notices) and business response to notices



With regard to the Fair Trading component, most businesses were already compliant. Only 16 per cent (32 out of the 192 for whom the Fair Trading checklist had been filled in) were referred by Fair Trading for further inquiry or investigation. Out of those 32, 21 were educated for minor issues such as fuel octane ratings not clearly marked on pumps and improper or no fuel signage. Only 11 businesses were issued warning letters for more substantial issues, in relation to not being on FuelCheck (9), price mismatch (1) and no fuel price signboard (1). And 8 of those had already taken corrective action at the time of the evaluation (Figure 4).

Figure 4. Overview of the actions taken by Fair Trading and outcomes



Another way to capture the potential impact the project had on businesses' compliance and the actions they may have taken in response to some agreed actions is to identify any call to the Customer Service Centre from service stations involved in this project. However, currently there is no way for staff from the Customer Service Centre team to link the request back to the project. There seems to be a disconnect between the inspectorate and the customer service team. The Customer Service Centre may receive notifications initiated following a project visit, without having the ability to go back to the inspector who conducted the visit. Staff from the Customer Service Centre would at least benefit from information about targeted projects happening over a specific period of time: list of inspectors, businesses visited, addresses and a FAQ. More broadly, some systems should be put in place to share or link information about businesses being in contact with the organisation through different avenues (inspections, calls, online enquiries).

4.3.2 Beyond immediate corrective actions, the project improved awareness on safety issues among most businesses

Most of the businesses interviewed (11 out of 15) reported that their level of confidence in meeting WHS requirements has improved as a result of the visit. Businesses commented most frequently that they became aware of things they didn't know previously and that they were shown how to rectify issues. They found the advice provided by the inspector and printed material particularly useful in that regard.

When asked about practical examples of changes they had made to their WHS practices following the visit, businesses most frequently referred to their site plans and other key files to keep handy. Other changes made were around buying new fire extinguishers or repositioning them; buying new safety vests; changing the position of the manifest box; installing barriers around chemicals or keeping them away from flammable or electrical areas; renewing training certificates; ensuring staff know what to do in an emergency situation, and making sure documents are up to date and

current. Businesses also provided examples in relation to Fair Trading requirements: taking off some products from FuelCheck, putting up extra signage or purchasing a new LED price board.

Some inspectors felt that with the advisory approach taken, businesses were more likely to seek further advice:

Got to the point where they're ringing you, asking for advice rather than fearing you, and bury their head in the sand hoping you don't come back. Very good approach in the first instance. Certainly got emails from them, providing the information I asked, photos or documents: 'we've done this, that, is that satisfactory'. Actually interacting with us and asking for information, not being afraid that we would come back and take enforcement. [SafeWork inspector]

A couple of internal stakeholders suggested that those businesses visited would benefit from further follow-up actions as businesses tend to go back to their bad habits. One internal project stakeholder suggested to provide further help, or by making it easier for such businesses to access training locally instead of having to drive to capital cities, for instance through NSW Rural Fire Service or the private organisations coming to check the fire extinguishers.

However, some inspectors reported that they had experienced resistant or cynical businesses that wouldn't make the required changes:

They see themselves as remote. They're not overly enthusiastic about compliance, they don't feel they can be touched. [SafeWork inspector]

The ones I visited were not compliant on FuelCheck and are still not. Quite a few are difficult customers, this is the way they're doing it, they've been doing it for years, it won't change. [SafeWork inspector]

4.3.3 There remain some key limitations for those businesses, in particular in relation to the costs implied

A key limitation in improving compliance for these kinds of small businesses are the costs associated with compliance. These can be quite substantial, as one business described:

Some of the things that we had to do cost us a lot, \$20k all up. One of the things was to decommission a tank. Some of the things we had to buy were quite expensive, e.g. a proper water system (had to go underground, new piping through): \$3.5k, can no longer have an ordinary hose sitting there. Had to have an emergency box. Had to have a proper spill kit; had one but wasn't up to do, another \$800-900. That was stressful and money to find. [Business]

Businesses were offered to apply for a small business rebate that could cover up to \$500 of the costs of safety equipment. By August 2017, 5 businesses out of the 201 visited had applied and received payment for a small business rebate. Four businesses applied for a spill kit and one for a manifest box; two received the maximum amount of \$500 as the cost of the equipment was higher,

and the two others received the exact amount of the cost of the equipment. While businesses welcomed the money, they sometimes felt it was very little compared to the costs incurred:

Yes got \$312, wow, out of \$500, woody woo. It didn't even pay for the interest at the bank!
[Business]

Another key limitation identified by an internal stakeholder in improving industry compliance is the turnover of business owners that seems to be quite high in the industry:

The turnover is problematic. We spend years and years of doing work with some service stations. We're doing all this work with a business operator, and then it changes to another operator. The pace of change is so fast that we have to redo the work again regularly.
[Internal project stakeholder]

To address this issue, it was recommended to target businesses that were changing ownership and provide them with all the appropriate documentation about compliance requirements at this stage. Businesses have to notify about any change in ownership, but it is not always done. However, the information could at least be made available online and easily accessible or targeted to businesses in this kind of situation.

5. Effectiveness of the collaborative model

This chapter assesses the effectiveness of the CRP collaborative model implemented in this project. It answers the following evaluation questions:

- How was the experience of participating agencies (internal stakeholders)?
- What was the impact of the project on participating agencies' resources?
- What benefits did the CRP process generate for participating agencies compared to Business As Usual (BAU)?
- What were the benefits of the additional data being collected and shared across partner agencies?
- To what extent did the project improve collaboration between partner agencies?
- How successful was the project in generating synergies between participating agencies?

5.1 The collaborative component of the project was mainly limited to the Fair Trading checklist

5.1.1 Inspectors and internal stakeholders were generally positive about the collaborative component

Most inspectors interviewed reported that the collaborative component was mainly taking the form of the Fair Trading checklist. This checklist is the main element of synergy between SafeWork and Fair Trading. Some also referred to the initial briefing that involved a Fair Trading representative.

The majority of inspectors didn't find that additional piece of data collection in any way challenging. It took a bit more time but wasn't felt too onerous. One inspector described how he would typically approach it:

Was just additional checking, wasn't overly onerous. Checked the price signs and the pump, wrote that down, took a phone photo of the signboard and made a call to the fuel check people. In one, the business did it for me straight away on the computer. [SafeWork inspector]

However, a few inspectors were less comfortable with the lack of clarity around the implications about what was happening with the data and the lack of authority.

Wasn't clear about the ramification of it, regarding the pricing etc, the implications it had in terms of power. It made us look quite poor, because we were not in a position to explain the purpose of getting the information, what would happen in terms of Fair Trading. Portraying us as the one who dobbed them in. Could have been articulated in a better way. [SafeWork inspector]

Internal project stakeholders also indicated that the Fair Trading checklist was the main element of the project's collaborative component. However, the project team members were involved in other collaborative activities such as the fortnightly meetings, the design of the initial webinar, the information on Hugo and providing one point of contact from each agency. The overall perception among internal project stakeholders was that the collaborative component worked very well. Key success factors included the support from the project sponsor and the positive attitude of the project team.

Most internal project stakeholders didn't feel that more could have been done in terms of collaboration. The joint visit in particular were not perceived as appropriate in the particular project context.

5.1.2 The impact of the collaborative component on agencies resources was very limited

The project was similar in many ways to other SafeWork projects, therefore had limited additional impact on resources as SafeWork intended to deliver the project anyway. The Fair Trading checklist took an additional 10 minutes for inspectors to do out of a 2 hours visit. The impact was more important for members of the project team, however it was never mentioned as an unnecessary impost. The project also benefitted from the support of CRP staff around project management.

There is no clear evidence of unintended negative consequence from the project, for example other projects suffering from too many resources being diverted for this project.

5.2 Benefits of the collaborative component were found to be mainly internal

5.2.1 For inspectors, the efficient use of resources across regulators was seen as the primary benefit of the collaboration

When asked about the main benefits of the collaborative components, many inspectors referred to sharing resources and the efficiencies generated between agencies with one visit instead of two. The project was felt to be particularly beneficial for Fair Trading in this regard, providing them with "another set of eyes".

Some inspectors also identified benefits for themselves in terms of additional competencies but also job security:

For me, the more stuff I've got to do, the more secure my job in a country town is, if it results in having us and keeping us here. [SafeWork inspector].

However, inspectors had balanced views about whether this particular project improved collaboration between partner agencies: 5 out of 9 were not sure, 3 didn't feel it had contributed to

an improvement in collaboration, and only one reported positively. At their level they were only collecting data on behalf of Fair Trading but didn't perceive that as evidence for collaboration.

5.2.2 Members from the project team reported additional benefit in terms of better understanding of the partner agencies

Internal project stakeholders identified as primary benefits the knowledge and understanding of the other agencies gained from working together.

One stakeholder was able to identify some early evidence of positive outcome generated from the project, where the positive experience from the project had flow-on effects on others:

More broadly, agencies are thinking about collaboration more. And the types of projects they might do and how they might do them. The construction project is a good example, when we were lagging in [visit] numbers, [the team came out together to work out a solution], sitting in the last vocational group [Inspector Practice Reference Group] meeting, one of the SafeWork representatives said that there was value in collaborative projects and the Fair Trading rep said the same thing. [Internal project stakeholder]

There is also the expectation that the project would trigger more systematic referrals between agencies based on the prior and successful experience project stakeholders and inspectors had:

In these kinds of situations, the knowledge you gain from working collaboratively, you realise this is something SafeWork would like to hear about, so you can start doing referrals. In the future inspectors may refer to us. One of the good outcomes that hopefully will flow through. [Internal project stakeholder]

5.2.3 The collaborative component didn't seem to make a clear difference for businesses in terms of customer experience

From the business point of view, the collaborative component was not always explicit: only 8 out of 15 businesses interviewed were aware that the visit involved components from two agencies, SafeWork and Fair Trading. When prompted about it, some businesses used the opportunity to express criticism about FuelCheck: two businesses felt that FuelCheck had limited value in regional areas and another one found that the system was not working (no response to emails, no real time data). In terms of reducing the number of contacts with regulatory agencies, most businesses confirmed that they haven't had much contact in the past.

Several internal project stakeholders also expressed doubts about the impact of the collaborative component on the customer experience. One of them commented:

Not sure businesses had a great idea of the collaborative aspect. The customer experience was very good, but not sure it as because it was a joint project. They're probably didn't have a baseline to really compare. [Internal project stakeholder]

This is in line with the feedback provided by inspectors and businesses where the positive experience businesses had from the projects was mostly associated with the advisory approach taken.

5.3 Further opportunities were identified to expand the scope of collaboration

5.3.1 Inspectors are supportive of further collaboration, however under certain conditions

All SafeWork inspectors interviewed were supportive of collecting additional information for another agency: 7 out of 13 were very supportive and 6 somewhat supportive. However, when asked about whether more could be done in terms of collaboration compared to the Fair Trading checklist, inspectors had balanced views: half (5 out of 10) responded positively, 4 were not sure and 1 responded negatively. Some inspectors commented ‘as long it stays straightforward’, within their core expertise and done in a similar way to this project.

Inspectors identified three types of limitations or requirements for further collaboration:

1. considering the expertise required and providing the appropriate training
2. providing the authority to act if a breach is identified
3. being mindful of the impact on resources that are finite. One inspector used the analogy of loading the donkey to reflect on the expectation that it should be a two way process in that regard:

Technically no limitations, except that it's not a continuous load. Use the load on the donkey image. You can't keep loading it on. It has to be clearly indicated what the priorities are. There were no issues there. Inspectors will do whatever they're told to do. That's basically how it works. But what happens is that other work suffers. [SafeWork inspector]

A few internal project stakeholders and inspectors also suggested that future collaborative projects should consider opportunities where the SafeWork could benefit from other agencies' resources.

At the moment, it's all one way. Collaboration is a two-way street, can't see any benefits for SafeWork. [SafeWork inspector]

5.3.2 The scope of collaboration could be expanded to other agencies

During the observation of site visits, the inspector and businesses visited identified other regulatory agencies that service stations have contact with: those are mainly local councils around food storage or regulators involved in other types of businesses that may be run on the site like RMS with a motor dealer. The SafeWork inspector also indicated that some recurrent questions asked by businesses during their visit that are beyond their scope of expertise were in relation to industrial relations, which falls under the remit of the NSW Industrial Relations Commission or Fair Work Australia.

On that point, the industry peak body identified other opportunities for synergy:

For a service station, you get EPA inspectors, you get SafeWork inspectors, you get Fair Trading inspectors, and you get National institutions of measurement inspectors, and there is a very few of those, but they have a big job, and they tend to look at equipment so that's an area to look at, and then you have council inspectors that look at food. And then of course employment inspectors which is separate. [...] So, maybe considering pairing out with national institute for measurement or consulting with the local councils before you roll out in a particular area and see if there is a way that maybe if they've got their own program you could roll out together, maybe that's an area for collaboration. [External stakeholder]

These are areas to explore to identify future opportunities for collaboration, while being mindful of the implications in terms of training for inspectors and in terms of time required for the business.

6. Conclusion

6.1 Overview of key findings

The Regional and Remote Services Station project was successfully delivered. Through these visits, inspectors developed businesses' knowledge and awareness of WHS compliance requirements, issuing improvement notices when required; Fair Trading acted on issues identified through education or warning letters.

The evidence collected and analysed through the evaluation shows that the project met its objectives in terms of building the compliance capability of small independently owned service stations operating in regional and remote New South Wales. Most of the businesses visited (82%) were of small size as initially intended. The level of compliance observed confirmed that these businesses had a low level of compliance, in particular the manifest and the emergency plan. The project has already made a difference: 54 businesses have improved their compliance by acting on improvement notices issued. Another 8 businesses have registered on FuelCheck following a Fair Trading warning letter. Feedback collected from businesses and inspectors indicate the project had a broader impact: most businesses interviewed reported that their level of confidence in meeting WHS requirements has improved as a result of the visit. In addition, most inspectors felt that the service stations visited had improved their level of compliance as a result of the visit in particular due to the advisory approach taken. Key remaining limitations in improving compliance in the industry relate to the costs associated with the compliance requirements which can be substantial for small businesses, and the general high turnover observed in the industry.

With regard to the objective of supporting the Commerce Regulation Program, the project demonstrated the effectiveness of collaborative regulatory activities taking the form of data collection, i.e. the Fair Trading checklist, on behalf of a partner agency. Most inspectors felt that the collaborative component of the project was limited, which also contributed to make it easier to implement. However inspectors would have liked to be more informed about what action was taken with the data being collected for individual businesses. The main benefit from the collaborative component was around the efficient use of resources across regulators, notably with Fair Trading benefitting from additional resources to cover hard to reach service stations. However, there is no clear evidence of benefits from the collaborative component for businesses: most of them confirmed that they didn't have much contact in the past, which couldn't lead to a reduction in touch points. Members of the project team reported other benefits in particular around improved knowledge and understanding of the partner agency gained from working together. Some early evidence shows flow-on effects from this positive experience with willingness to participate in other collaborative projects or developing systematic referral processes. Inspectors are also supportive of further collaboration, however being mindful of the implications in terms of expertise and authority required and the impact on resources which should be shared.

6.2 Recommendations

Two types of recommendations were identified through the evaluation: firstly areas for improvement for the project as it was delivered in the perspective of turning it into business as usual; and secondly recommendations for future collaborative regulatory projects.

6.2.1 Areas for improvement for the project turned into Business As Usual

Many internal project stakeholders agreed that the project should be turned into Business As Usual and a few inspectors suggested spontaneously that the project should become an ongoing activity. While inspectors acknowledged that they were not able to cover all small independent service stations in regional and remote areas, some internal project stakeholders suggested mapping out service stations covered. This would help identify those that were not visited based on the available information (Fair Trading FuelCheck list, GLS dataset and inspectors local knowledge) and progressively go through the remainder. Service stations visits could then become an ongoing activity when inspectors are going to regional towns for other projects.

Turning the project into BAU offers the opportunity to refine it around particular project components (Table 16).

Table 16. Areas for improvement for the project turned into BAU

Project component	Area for improvement
Inspector resources	<ol style="list-style-type: none"> 1. Review the inspector's audit tool to streamline it: <ol style="list-style-type: none"> 1.1. identify priority areas, i.e. distinguishing legislative requirements from good practice based on industry standards 2. Review the business' self-audit checklist accordingly and make it more user-friendly <ol style="list-style-type: none"> 2.1. simplify the language (plain English) 2.2. add page numbers 2.3. making it available online. 3. Clearly flag the collaborative nature of the project in the business's self-audit checklist and identify key contacts from each partner agency 4. Explore how to address emerging issues, such as the maintenance of bowsers by business owners themselves
Visits	<ol style="list-style-type: none"> 5. Identify remaining service stations to cover in regional and remote New South Wales <ol style="list-style-type: none"> 5.1. Working from the list of service stations generated from FuelCheck and/or the industry peak body, exclude those that were covered by the project and identify as a priority those service stations that don't belong to a network (based on the service stations' names). 5.2. Split the list of remaining service stations between the different SafeWork regions and organise inspectors capacity accordingly to progressively cover them.

Project component	Area for improvement
Collaborative component	<ol style="list-style-type: none"> 6. Provide continuous feedback from Fair Trading to SafeWork inspectors about what happen with the data provided on FuelCheck and price signage for each business visited 7. Consider expanding collaboration to other regulators: EPA, National Institute for Measurement
Follow-up	<ol style="list-style-type: none"> 8. Promote follow-up contacts by inspectors, e.g. every 6 months, to ensure businesses changes are implemented and sustained 9. Explore ways to make it easier and cheaper for businesses to implement recommended actions, e.g. by developing partnerships with local organisations to provide safety training

6.2.2 Recommendations for future collaborative regulatory projects

The evidence and feedback collected for the evaluation also identified a number of recommendations to inform the design and delivery of future collaborative regulatory projects. These are presented against the respective project area in the following table.

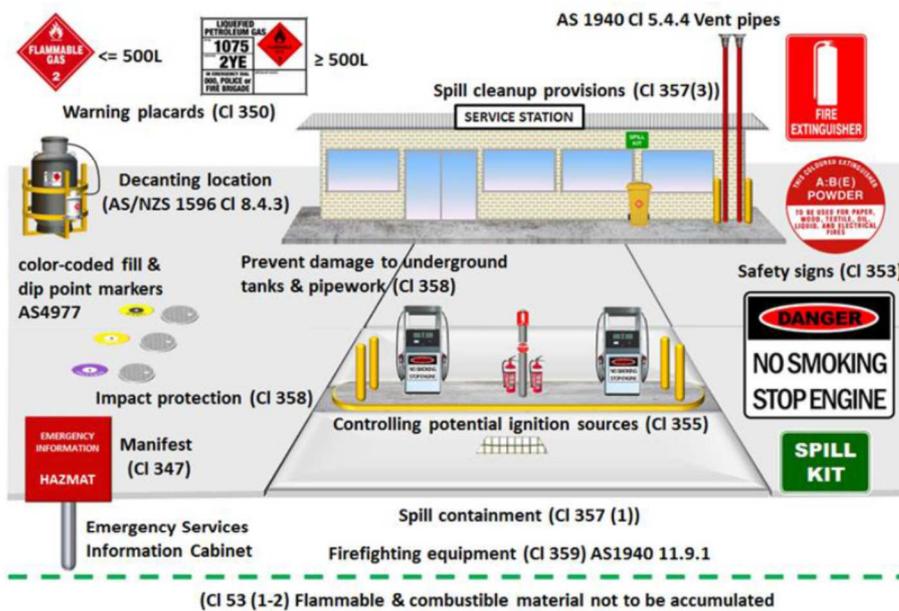
Table 17. Recommendations for future collaborative regulatory projects

Area	Recommendation
Project design	<ol style="list-style-type: none"> 1. Target appropriate industries with clear synergies between regulators and at appropriate times in the business cycle to generate sustained behaviour change, e.g. change in ownership 2. Consider expanding collaboration to other regulators, e.g. EPA 3. Explore opportunities for collaborative projects where the impost is not primarily on SafeWork resources ('two-way street') 4. Ensure proper data analysis review of past project targeting the same industry informs the design of the project 5. Consider expanding the scope for collaboration to include the ability for inspectors to take enforcement actions with appropriate authority 6. Develop clear referral processes for inspectors to refer issues to appropriate agencies when they don't have the authority to act 7. Consult with union representatives and external stakeholders early in the process to ensure ownership and appropriate engagement from the outset 8. Ensure appropriate authority meets legislative requirements once agreed on the form of the collaborative component, to ensure appropriate processes and documentation are put in place in terms of authority, data collection and data sharing (including around businesses consent forms) 9. Clearly flag the collaborative nature of the project in any project material provided to businesses and identify key contacts from each partner agency
Project management	<ol style="list-style-type: none"> 10. Develop a project management checklist for collaborative projects, including key stakeholder to consult with and documents to develop at each stage

Area	Recommendation
Project implementation	<ul style="list-style-type: none"> 11. Promote the use of inspectors' audit tools similar to the one used for the service stations project, i.e. with visuals and detailed references to the regulation 12. Ensure appropriate (preferably face-to-face) and sufficient training about the collaborative component that is outside inspectors usual area of expertise is provided before implementation starts 13. Communicate key project documentation (project plan, list of inspectors involved) to the Customer Service Centre so that they can anticipate any potential impact in terms of businesses requests and provide the list of businesses visited along the way
Data systems	<ul style="list-style-type: none"> 14. Consider incorporating all key project questions from the inspector's audit checklist into WSMS to make use of the data collected by inspectors in allowing for more refined analysed 15. Develop a standardised typology of agreed actions (currently free text) to facilitate analysis 16. Add the ability for inspectors to record actions taken by businesses against agreed actions through follow-up visits, e.g. started to act, action partially implemented, action fully implemented 17. Consider developing a unique identifier for businesses (or entities more broadly) to allow for easy data linkage in a de-identified data environment
Evaluation	<ul style="list-style-type: none"> 18. Embed consent process in the inspector checklist to make it less cumbersome for the business 19. Plan for businesses follow-up surveys/ interviews to be organised along the way instead of at the end of the project, to allow for more accurate feedback (closer to the interaction) and a better response rate 20. Facilitate access to all project data across DFSI for research and evaluation purposes 21. Explore ways to access incident data by industry sub-group (e.g. regional service stations) as a context indicator

Appendix 1. Service Station Safety Audit Tool

Service Station SAFETY AUDIT TOOL



Service Station Safety Audit															
PCBU: _____	ABN: _____														
Address: _____	Date: _____														
PCBU Rep: _____	Contact No: _____														
Email: _____	Worker rep: _____														
<p>The Work Health & Safety Regulation 2011 requires any workplace that uses, handles or stores more than a manifest quantity of hazardous chemicals to prepare a manifest for that workplace,</p>															
<p>1. <input type="checkbox"/> Is there a manifest quantity of hazardous chemicals on site? (WHSR Schedule 11)</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"><input type="checkbox"/> Category 2 flammable liquids (i.e. Petrol 2500 litres)</td> <td style="width: 50%; border: none;"><input type="checkbox"/> Placard quantity 250 litres</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Category 3 flammable liquids (i.e. Kerosene 10,000 litres)</td> <td style="border: none;"><input type="checkbox"/> Placard quantity 1,000 litres</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Combined quantity cat 1,2,3 flammable liquids (10,000 litres)</td> <td style="border: none;"><input type="checkbox"/> Placard quantity 1,000 litres</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Category 4 flammable liquids (i.e. Diesel 100,000 litres)</td> <td style="border: none;"><input type="checkbox"/> Placard quantity 10,000 litres</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Category 1 flammable gases (i.e. LPG 5,000 litres)</td> <td style="border: none;"><input type="checkbox"/> Placard quantity 200 litres</td> </tr> </table> <p>a. <input type="checkbox"/> Has the PCBU prepared a manifest? WHSR 347(1)(a)</p> <p>b. <input type="checkbox"/> Does the manifest contain all the required information? WHSR Schedule 12 (Refer appendix: 1)</p> <p>c. <input type="checkbox"/> Is the information up to date? (i.e. correct PCBU, fuel quantities, site plan) WHSR 347(1)(b)</p> <p>d. <input type="checkbox"/> Manifest kept in a manifest box (ESIC) near the service stations entrance/s or another position agreed to by F & R NSW? WHSR 347(3)(a) (refer notes page 5)</p> <p>e. <input type="checkbox"/> Is the ESIC/Manifest box fitted with a 003 emergency services lock? (refer notes page 5)</p> <p>f. <input type="checkbox"/> Is the manifest readily available to emergency services? WHSR 347(3)(c)</p>		<input type="checkbox"/> Category 2 flammable liquids (i.e. Petrol 2500 litres)	<input type="checkbox"/> Placard quantity 250 litres	<input type="checkbox"/> Category 3 flammable liquids (i.e. Kerosene 10,000 litres)	<input type="checkbox"/> Placard quantity 1,000 litres	<input type="checkbox"/> Combined quantity cat 1,2,3 flammable liquids (10,000 litres)	<input type="checkbox"/> Placard quantity 1,000 litres	<input type="checkbox"/> Category 4 flammable liquids (i.e. Diesel 100,000 litres)	<input type="checkbox"/> Placard quantity 10,000 litres	<input type="checkbox"/> Category 1 flammable gases (i.e. LPG 5,000 litres)	<input type="checkbox"/> Placard quantity 200 litres				
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<p>2. <input type="checkbox"/> Has the PCBU notified SafeWork NSW? WHSR 348</p> <p>a. <input type="checkbox"/> Does the PCBU have an acknowledgement letter from SafeWork?</p> <p style="padding-left: 40px;">NDG: _____ (Ref app 2)</p> <p>b. <input type="checkbox"/> Is the information in the acknowledgement letter up to date?</p> <p>3. <input type="checkbox"/> Are the acknowledgement letter & manifest consistent? i.e. Same PCBU, fuel quantities, address</p> <p>4. <input type="checkbox"/> Is the acknowledgement letter & manifest consistent with the worksite?</p>															
<p>5. <input type="checkbox"/> Has the PCBU prepared & implemented an emergency plan? WHSR 43 & 361</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 60%; border: none;">a. <input type="checkbox"/> Does the plan contain the required information? WHSR 43(1)(a)</td> <td style="width: 40%; border: none;">Ref: Emergency plans fact sheet</td> </tr> <tr> <td style="border: none;">b. <input type="checkbox"/> Has a copy of the emergency plan been sent to F & R NSW? WHSR 361(2)</td> <td style="border: none;">_____</td> </tr> <tr> <td style="border: none;">c. <input type="checkbox"/> Does the PCBU have an acknowledgement from F & R NSW? (F & R NSW Guide)</td> <td style="border: none;">_____</td> </tr> <tr> <td style="border: none;">d. <input type="checkbox"/> Has F & R NSW recommended amendments to emergency plan? WHSR 361(3)</td> <td style="border: none;">_____</td> </tr> <tr> <td style="border: none;">e. <input type="checkbox"/> Have those recommendations been implemented? WHSR 361(3)</td> <td style="border: none;">_____</td> </tr> <tr> <td style="border: none;">f. <input type="checkbox"/> Are worker/s trained & / or competent to initiate emergency plan? WHSR 43(c)</td> <td style="border: none;">_____</td> </tr> <tr> <td style="border: none;">g. <input type="checkbox"/> Are emergency drills carried out? WHSR 43(b)</td> <td style="border: none;">_____</td> </tr> </table>		a. <input type="checkbox"/> Does the plan contain the required information? WHSR 43(1)(a)	Ref: Emergency plans fact sheet	b. <input type="checkbox"/> Has a copy of the emergency plan been sent to F & R NSW? WHSR 361(2)	_____	c. <input type="checkbox"/> Does the PCBU have an acknowledgement from F & R NSW? (F & R NSW Guide)	_____	d. <input type="checkbox"/> Has F & R NSW recommended amendments to emergency plan? WHSR 361(3)	_____	e. <input type="checkbox"/> Have those recommendations been implemented? WHSR 361(3)	_____	f. <input type="checkbox"/> Are worker/s trained & / or competent to initiate emergency plan? WHSR 43(c)	_____	g. <input type="checkbox"/> Are emergency drills carried out? WHSR 43(b)	_____
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<p>6. <input type="checkbox"/> Is there an up to date Hazardous Chemical Register on site? WHSR 346</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 60%; border: none;">a. <input type="checkbox"/> Is it readily accessible to worker? WHSR 346(2)</td> <td style="width: 40%; border: none;">Ref: SWA COP Managing the risks of Hazardous Chemicals in the Workplace</td> </tr> <tr> <td style="border: none;">b. <input type="checkbox"/> Does the PCBU have all the required Safety Data Sheets WHSR 344(1)</td> <td style="border: none;">_____</td> </tr> <tr> <td style="border: none;">c. <input type="checkbox"/> Are they in an easily identifiable & readily accessible location? WHSR 344(3)</td> <td style="border: none;">_____</td> </tr> <tr> <td style="border: none;">d. <input type="checkbox"/> Are they up to date & in the correct format? WHSR 330(3) & Schedule 7</td> <td style="border: none;">_____</td> </tr> <tr> <td style="border: none;">e. <input type="checkbox"/> Have they been reviewed by the PCBU?</td> <td style="border: none;">_____</td> </tr> </table>		a. <input type="checkbox"/> Is it readily accessible to worker? WHSR 346(2)	Ref: SWA COP Managing the risks of Hazardous Chemicals in the Workplace	b. <input type="checkbox"/> Does the PCBU have all the required Safety Data Sheets WHSR 344(1)	_____	c. <input type="checkbox"/> Are they in an easily identifiable & readily accessible location? WHSR 344(3)	_____	d. <input type="checkbox"/> Are they up to date & in the correct format? WHSR 330(3) & Schedule 7	_____	e. <input type="checkbox"/> Have they been reviewed by the PCBU?	_____				
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<p>7. <input type="checkbox"/> Is the required first aid equipment on site? WHSR 42(1)</p> <p>8. <input type="checkbox"/> there an adequate access trained first aiders WHSR 42(2)</p> <p>9. <input type="checkbox"/> Does the PCBU have a consultative process in place? WHSR 47</p> <p>10. <input type="checkbox"/> Does the PCBU have a Workers Compensation Policy? WC Act S155</p> <p style="padding-left: 20px;">Policy No: _____</p> <p>11. <input type="checkbox"/> Does the PCBU have a Return to Work Program? WIMWC Act S52</p> <p>12. <input type="checkbox"/> Summary of WIMWC Act displayed & policy details available to workers WIMWC Act S231 (If you get injured at work poster)</p> <p>13. <input type="checkbox"/> Is there an Injury Register on site? WIMWC Act S63</p>															

NSW FAIR TRADING CHECKLIST			
<u>Clause 11 Fair Trading Regulation 2012</u>			Y/N/Na
1	Is the station displaying one or more signs that are so positioned & lit & readily seen by motorist approaching the petrol station at any time the petrol station is supplying fuel to customers?		<input type="checkbox"/>
2	Is the station only displaying the normal price of the prescribed fuel supplied to retail customers & no other 'discounted price'?		<input type="checkbox"/>
3	Is the Station displaying the correct fuel types on their price signboards? Note: If the petrol station offers 4 or more fuel types the signboard only needs to display 4 fuel types. However if the petrol station supplies E10, diesel or LPG the signboard must include their prices & the next top-selling/s prescribed fuel/s up to a maximum 4.		<input type="checkbox"/>
4	Are the fuel octane rating on each fuel sold (except diesel & LPG) clearly marked on all the fuel pumps?		<input type="checkbox"/>
5	Do the prices displayed on the petrol price signboard/s match the prices on the fuel pumps		<input type="checkbox"/>
<u>Fair Trading (Fuel Check) Order 2016 under the Fair Trading Act 1987</u>			
6	Is the PCBU registered with fuel check? (www.fuelcheck.nsw.gov.au) check on line		<input type="checkbox"/>
7	If Yes, what is their fuel station registration number on fuel check? SS _____		<input type="checkbox"/>
8	Do the prices on fuel check match the prices displayed on sign board?		<input type="checkbox"/>
	Fuel type	Fuel pump (dispenser) price	Sign board price
			Fuel check price

Fair Trading Regulation 2012 Clause 11 Product information standard [amended on 1/1/2017]

11 Product information standard

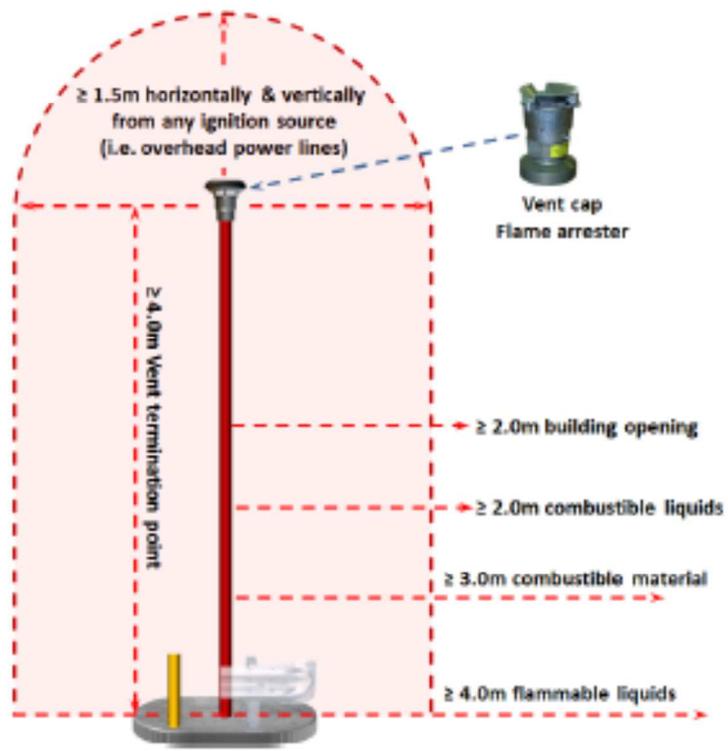
- (1) The price of prescribed fuel supplied to retail customers at the service station must be displayed at the service station on one or more signs that are so positioned & lit that any price & other matter that the signs display will be readily seen by motorists approaching the service station at any time that the service station is open for business for the supply of prescribed fuel.
- (2) All signs at the service station (including signs required by subclause (1)) that display information in relation to the price of prescribed fuel supplied to retail customers at the service station may display only the standard retail price of the prescribed fuel & no other price for that fuel.
- (3) If no more than 4 types of prescribed fuel are supplied to retail customers at the service station, subclause (1) applies to each type of prescribed fuel supplied.
- (4) If more than 4 types of prescribed fuel are supplied to retail customers at the service station:
- (a) the price of 4 types of prescribed fuel must be displayed as required by subclause (1), &
- (b) the 4 types of prescribed fuel for which the price must be displayed must include such of the following types of prescribed fuel as are supplied to retail customers at the service station:
- (i) diesel,
- (ii) LPG,
- (iii) E10.
- (5) Nothing in subclauses (1)–(4) prevent:
- (a) the standard retail price of other types of prescribed fuel supplied to retail customers at the service station from being displayed on signs required by subclause (1) in addition to the information required to be displayed on those signs, or
- (b) the prices of types of prescribed fuel from being displayed in any order on a sign at the service station, or
- (c) any sign at the service station containing information about discounts & special offers so long as the price of any type of prescribed fuel shown on the sign is the standard retail price of the fuel.

Note 1: if PCBU indicates they are having updating fuel prices on fuel check advise them to contact Fair Trading via the following e-mail address: fuelchecknews@finance.nsw.gov.au

Manifest map checklist only		
<u>WHSR Clause 347</u> Manifest of hazardous chemicals		
<u>Clause 347(2)</u> A manifest of <u>Schedule 11</u> hazardous chemicals must comply with <u>Schedule 12</u>		
<u>Schedule 12 (7)</u> Manifest - plan of workplace		
	Y/N/N/a	Notes
Does the manifest contain a plan of the workplace?	<input type="checkbox"/>	_____
Is the plan to scale?	<input type="checkbox"/>	_____
Does the plan show:		
True North?	<input type="checkbox"/>	_____
Location and ID No./code/description of bulk storage areas not in containers (e.g. stockpiles)?	<input type="checkbox"/>	_____
Location and ID No./code/description of bulk containers (e.g. tanks and vessels)?	<input type="checkbox"/>	_____
Location and ID No./code/description of package and Intermediate Bulk Containers (IBC) storage areas?	<input type="checkbox"/>	_____
Location and ID No./code/description of manufacturing areas?	<input type="checkbox"/>	_____
Location and ID No./code/description of in transit areas?	<input type="checkbox"/>	_____
Legend for identification numbers or codes used in the plan?	<input type="checkbox"/>	_____
The main entrance and other entry and exit points to the workplace?	<input type="checkbox"/>	_____
Essential site services including fire services or gas supply?	<input type="checkbox"/>	_____
Location of isolation points for fuel and power?	<input type="checkbox"/>	_____
Location of all drains?	<input type="checkbox"/>	_____
Location of the manifest?	<input type="checkbox"/>	_____
Description of the nature of the occupancy of adjoining sites or premises?	<input type="checkbox"/>	_____
<i>Advisory only:</i>		
Is plan A3 in size?	<input type="checkbox"/>	_____
Is the plan laminated?	<input type="checkbox"/>	_____
Comments: <i>Items in red most probably not required in a service station manifest</i>		_____

FORECOURT (Emergency Services Information Cabinet & Manifest)		
<p>Manifest requirements</p> <p>Clause 347 WHSR 2011 requires a PCBU that has manifest quantity of schedule 11 Hazardous Chemicals on site to prepare a manifest in accordance with schedule 12 & Keep it in a place determined in agreement with the primary emergency service organisation (NSW Fire & Rescue)</p>	<p>References</p> <p>WHSR 2011 Cl 437 Manifest requirements Schedule 11 Schedule 12</p>	<p>Example</p> <p>Emergency Services Information Cabinet (ESIC) / Manifest Box</p> 
<p>NSW Fire & Rescue</p> <ol style="list-style-type: none"> NSW Fire & Rescue recommend that PCBUs keep a copy of their manifest <ol style="list-style-type: none"> In a prominently labelled weather proof Emergency Services Information Cabinet (ESIC) / Manifest Box (See example) Fitted with a 003 Emergency Service lock at or near the sites main entrance/s If this is done the manifest is deemed to be kept in a place determined in agreement with the primary emergency service. However if a PCBU wishes to keep the manifest anywhere else agreement must be sought. Note this agreement is to NSW Fire & Rescue not the local brigade 		
<div style="text-align: center;">  </div> <p>Note: The outer warning placards (WHSR 349) are not required at retail fuel outlets (Service Stations)</p>		

FLAMMABLE LIQUID UNDERGROUND TANK VENT PIPES (section 4)

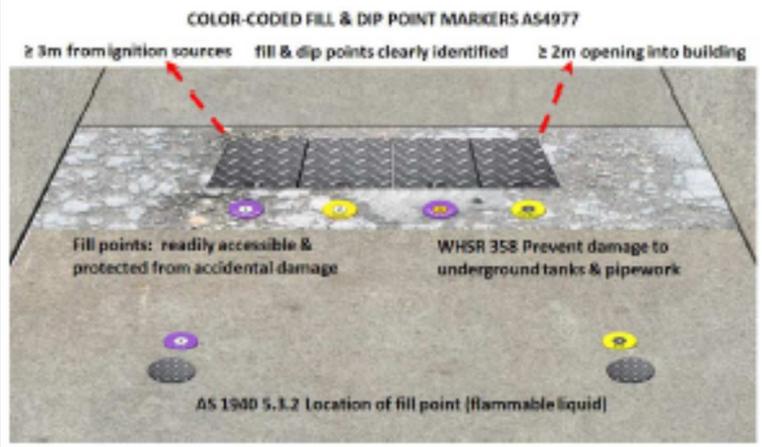


SEPARATION DISTANCES
AS 1940 CI 5.4.4 Exclusion zones for vent outlets
Impact protection CI 358

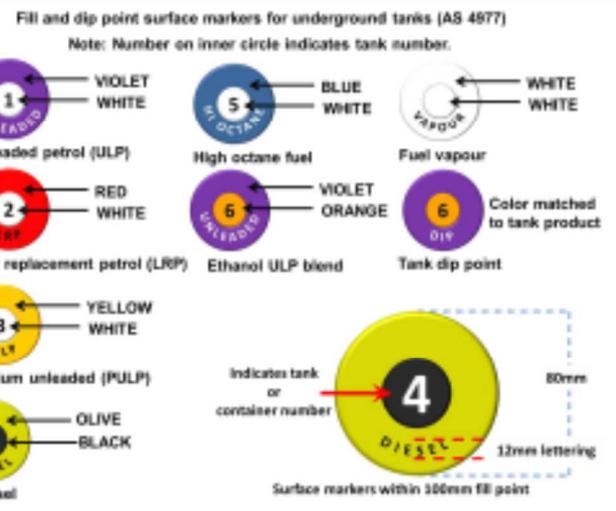
potential ignition sources Controlled ([WHS8 CI 355](#))
 Separation distance maintained AS 1940 CI 5.4.4 Exclusion zones for vent outlets
 Vents away from trafficable areas or protected by bollards or barriers etc.? [WHS8 CI 358](#)
 Vent terminal point's ≥ 4m above ground?
 Vent pipes against a wall secured to it?
 Underground tank & pipework protected from damage? ([WHS8 358](#))

Notes

FLAMMABLE LIQUID UNDERGROUND STORAGE TANK FILL & DIP POINTS

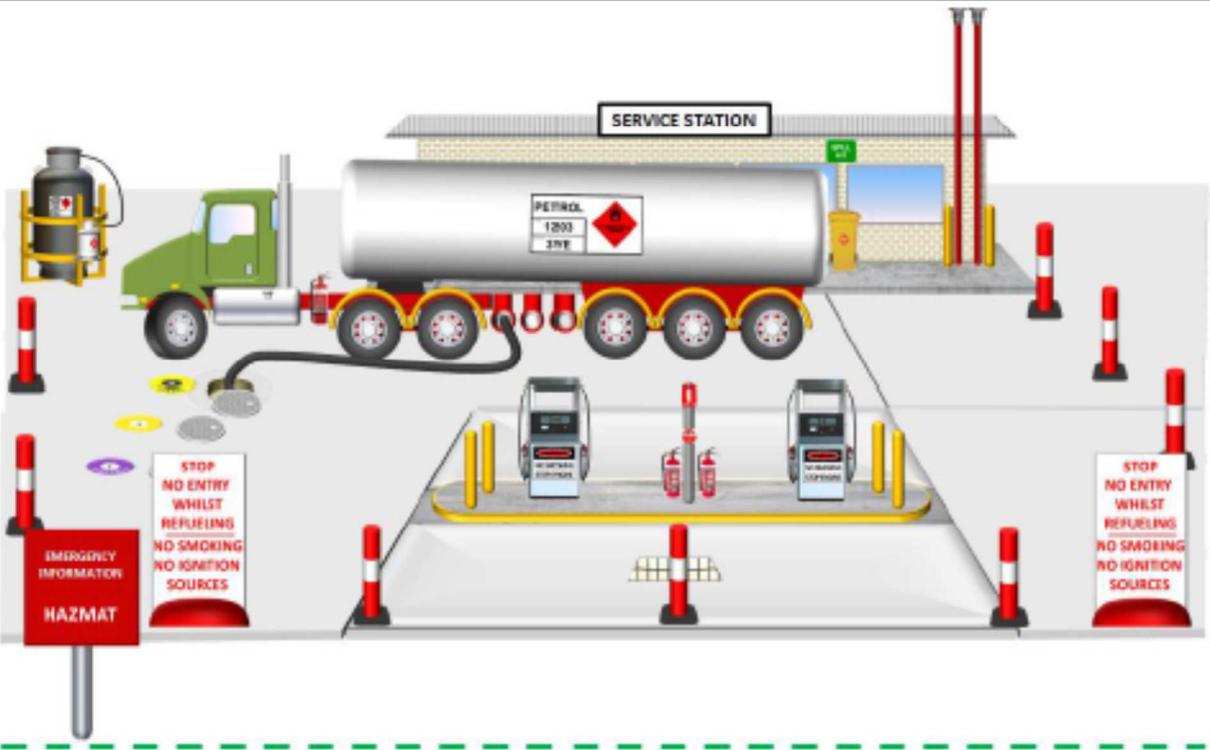


- Fill & dip points clearly identified? Ref: AS 4977-2008 cl 3.2 & figure 3.1
- Surface markers within 100mm of fill & dip points
- Fill & dip point surface markers color coded in accordance with AS 4977
- Fill & dip points readily accessible?
- Fill & dip points protected from accidental damage? ([WHSR Cl.358](#))
- Fill & dip point's ≥ 3m from ignition sources? ([WHSR Cl.355](#))
- Fill & dip point's ≥ 2m from openings into buildings?
- Underground tank & pipework protected from damage? ([WHSR 358](#))
- Area around fill & dip points free of debris, water & other potential contaminants?
- Fill & dip points sealed to prevent vapour release?



Notes

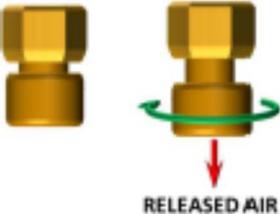
BULK FUEL TRANSFER (Flammable liquid)



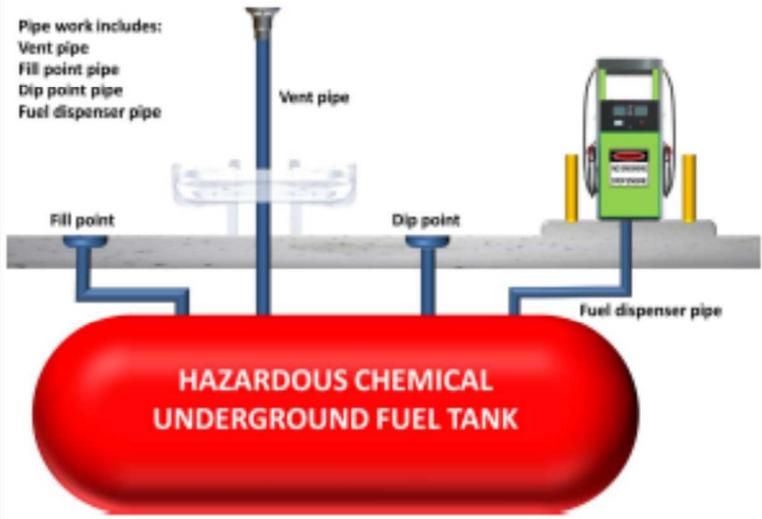


- Are safety procedures in place for transferring of bulk fuel from tanker to tanks?
- Are those procedures documented?
- Are operator/s able to describe those procedures?
- Is there a designated area for transferring of bulk fuel from tanker to tanks?
- Are potential ignition sources Controlled? [WHSB CLASS \(AS 60079.10.1\)](#)
- 4m exclusion zone (ignition sources) from tanker discharge point (exclusion zone defined)
- 3m exclusion zone (ignition sources) from tank fill point

<p>Notes:</p> <p>If the exclusion zone extends over the service station driveway or a fuel dispensing area, vehicles must be prohibited from entering that area. The service station may need to be shut down for the duration of the tank filling operation or the tank filling operation carried out outside of normal operating hours. The tanker delivery driver and site operator must have a clear understanding of where the exclusion zone extends to and provide adequate barriers (e.g. witches hats) and warning signs for the duration that transfer hoses are connected.</p> <p>AS 1940 9.18 BULK TRANSFER</p> <p>9.18.1 General requirements</p> <p>Safe filling and emptying procedures for tanks and tankers shall be established on the basis of the following requirements:</p> <p>(a) A safe filling level that allows for thermal expansion shall be established, and shall not be exceeded.</p> <p>(b) Filling and emptying flow-rates for which the tank vents were designed shall not be exceeded.</p> <p>(c) Filling shall be monitored and controlled so as to prevent the occurrence of overflow, spillage, or excessive pressure in the tank.</p> <p>(d) The recommendations of AS/NZS 1020 and the requirements of the ADG Code shall be observed wherever applicable.</p> <p>9.18.2 Control of static electricity</p> <p>The requirements of AS/NZS 1020 and AIP CP8, as appropriate, shall be observed when transferring flammable or combustible liquids into any container or tank to control and safely dissipate any static electricity generated during the operation.</p> <p>9.18.3 Continuity testing</p> <p>Tests shall be carried out at intervals of not more than six months to ensure that earthing and bonding is effective and that the resistance between a vehicle tank and earth is not greater than 1MΩ.</p> <p>9.18.4 Restrictions on vehicles in tank vehicle filling facilities</p> <p>The following restrictions apply to vehicles in filling facilities handling flammable liquids:</p> <p>(a) A tank vehicle shall be positioned at all times so that in an emergency it can be driven or towed straight out without recourse to reversing.</p> <p>(b) The tank vehicle should be driven forward into the tank vehicle filling area rather than being backed in. Where the layout makes this impossible, so that reversing is unavoidable, a person shall be stationed to guide the driver while reversing.</p> <p>(c) No vehicle, including tank vehicles, shall be maintained or serviced whilst in the tank vehicle filling facility except for the refueling of the vehicle running tank.</p> <p>(d) No vehicle, other than a tank vehicle, a vehicle associated with maintenance of the filling facility or an emergency services vehicle, shall be permitted to pass through or stand in a dedicated vehicle filling facility, consisting of two or more filling positions.</p> <p>(e) A tanker containing product shall not park or stand in or under a filling facility other than when filling or draining.</p> <p>(f) Where a flammable liquid spill occurs at the filling facility while a tank vehicle is standing therein, the vehicle engine shall not be started until the spill has been satisfactorily cleaned up, except in the case of an emergency.</p> <p>The requirements of items (c) and (d) may be varied by the use of a work permit.</p> <p>Where a filling facility has been constructed for combustible liquids only and it is separated from a flammable liquid filling facility by more than 15m, the requirements of items (d), (e) and (f) shall not apply.</p>	<p>Is exclusion zone clearly identified? (I.e. demarcation lines, witches hats, signs etc.) <input type="checkbox"/></p> <p>Does exclusion zone extend over driveway or a fuel dispensing area? <input type="checkbox"/></p> <p>If yes are vehicles & pedestrians not involved in the procedure prevented from entering zone? <input type="checkbox"/></p> <p>Note: station needs to be closed or bulk fuel transfers performed out outside operating hours</p> <p>Are tankers parked wholly within property during discharge process? <input type="checkbox"/></p> <p>Are there systems to prevent tanker movement during discharge process? (I.e. handbrake on) <input type="checkbox"/></p> <p>Is tanker able to travel (or be towed) forward to exit site (emergencies)? <input type="checkbox"/></p> <p>Is tankers exit path unobstructed at all times during transfer process? <input type="checkbox"/></p> <p>Are there procedures in place to ensure no persons remain in tankers cabin during transfer? <input type="checkbox"/></p> <p>Is operator/driver able to view discharge & fill points during discharge process? <input type="checkbox"/></p> <p>Driver able to stop discharge process if an emergency occurs? <input type="checkbox"/></p> <p>Is there adequate fire fighting equipment available during discharge process? <input type="checkbox"/></p> <p>Is discharge process monitored to prevent fuel overflow, spillage, or excessive tank pressure? <input type="checkbox"/></p> <p>Flexible transfer hoses not running under tanker? <input type="checkbox"/></p> <p>Is there a system in place to prevent the buildup or discharge of static electricity? <input type="checkbox"/></p>
	<p>References:</p> <p>Australian Dangerous Good code Chapter 10 - Transfer Requirements</p> <p>AS/NZS AS/NZS 60079.10.1:2009 Explosive atmospheres</p> <p>Part 10.1: Classification of areas— Explosive gas atmospheres</p> <p>AS 1940 - 2004 the storage and handling of flammable and combustible liquids</p> <p>WHSR G 355</p> <hr/> <p style="text-align: center;">Notes</p> <hr/>

 <p>SAFETY (RELIEF) VALVE</p>	<p style="text-align: center;">Operational Checks</p> <p>Have operator turn unit on &:</p> <p>Check that it is running smoothly (i.e. no excessive noise or vibration) <input type="checkbox"/></p> <p>Check that pressure gauge is working <input type="checkbox"/></p> <p>Check that units motor cuts out before maximum working pressure is exceeded <small>Note: If max pressure is exceeded This may indicate that regulator has been damaged or tampered with &/or pressure switch is faulty &/ or relief valve is not working correctly</small> <input type="checkbox"/></p> <p>Check gauge to ensure pressure does not drop whilst unit is not being used <small>Note: If pressure drops &/or motor cuts in this may indicate that the unit is losing air (i.e. leaking valves, hoses, fittings, air receiver etc.)</small> <input type="checkbox"/></p> <p>Have operator open relief valve and check that air is escaping through valve & air pressure is dropping <input type="checkbox"/></p> <p>Once air receiver is free of compressed air have operator open drain valve & check that valve opens easily & excessive condensation, oil or other contaminants are not released as this may indicate that valve is not routinely opened & the air receiver drained <input type="checkbox"/></p> <p>Notes:</p> <ol style="list-style-type: none"> 1. condensation if not removed routinely it will led to corrosion inside the air receiver 2. Oil inside the air receiver may indicate that there is excessive wear inside the compressor <p><small>Note: If safety valve opens before units motor cuts out the pressure switch may be damaged</small> <input type="checkbox"/></p>
 <p>DRAIN VALVE</p>	<p>References:</p> <p>AS/NZS 3788:2006 Pressure equipment – In-service inspection. AS 4343-2014: Pressure equipment – Hazard levels.</p> <ol style="list-style-type: none"> 1. SafeWork Australia Information Sheet "Compressed Air and Air Receiver" <p style="text-align: center;">Notes</p> <hr/>

ABANDONED ABOVE & UNDERGROUND (Hazardous chemicals) TANKS



In Clause 367 tank means a container, other than an IBC designed to use, handle or store hazardous chemicals in bulk, and includes fittings, closures and other equipment attached to the container.

Abandoned underground tanks (WHSR 366 & 367)
 Any underground storage system (i.e., tank) not in use must be removed, or if not reasonably practical to do so, then made safe. It may not be reasonably practical to do so due to significant pipe work associated with other tanks and services in the subsurface above the tank or removal will impact on surrounding structures (e.g. adjacent tanks).
 If an underground or mounded tank used to store hazardous chemicals has not been used for two years it must be considered abandoned and SafeWork NSW must be notified using their online Notification of Schedule 11 Hazardous Chemicals form
 Any abandoned underground tanks should be dealt with in accordance with Australian Standard AS 4976-2008 : The removal and disposal of underground petroleum storage tanks

WHSR 365 Stopping use and disposing of handling systems
 (i.e. tank, container, pump, dispenser & pipework, etc.)

Are there any (above ground) systems on site no longer in use?

If yes, has the PCBU taken steps to ensure the system is free of hazardous chemicals?

If not is the system correctly labeled? (refer: WHSR Subdivision 3 of Division2)

Does the PCBU intend to reuse or dispose of the system?

If applicable:
 Have they amended their manifest & notified SafeWork NSW?

WHSR 366 Stopping use of underground storage and handling systems

Are there any systems on site no longer in use?

Does the PCBU intend to dispose of or reuse the system?

If the PCBU does not intend to dispose of or reuse the system have they taken reasonable steps to ensure the system is without risks to health & safety?

Are there any systems identified in the manifest that have been disposed of?

Have they amended the manifest & notified SafeWork NSW?

367 Notification of abandoned tank (underground, partially underground or fully mounded)

Are there any tanks on site that have not stored flammable gases or liquids for ≥ 2 years?

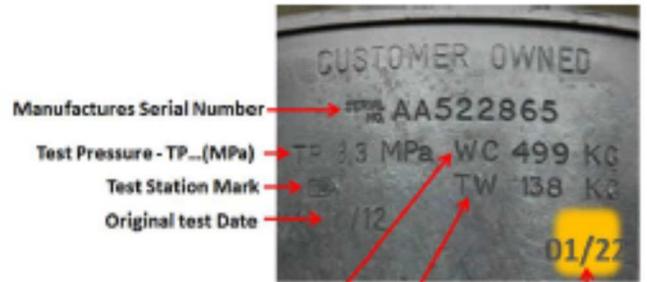
Are there any underground tanks on site that the PCBU does not intend to reuse?

Has the PCBU notified SafeWork NSW? (the regulator)

Publications:
[Guidance material Notifications for Schedule 11 hazardous chemicals & abandoned tanks](#)
 AS 4976-2008 : The removal & disposal of underground petroleum storage tanks

Notes

LPG DECANTING



Manufactures Serial Number → AA522865
 Test Pressure - TP (MPa) → 3.3 MPa
 Test Station Mark →
 Original test Date → /12
 Water Capacity (kg) → WC 499 KG
 Original Tare Mass - TW (kg) → TW 138 KG
 Retest date (if applicable) colour patch → 01/22
 Example test marks → 992 A

Figure 8.1

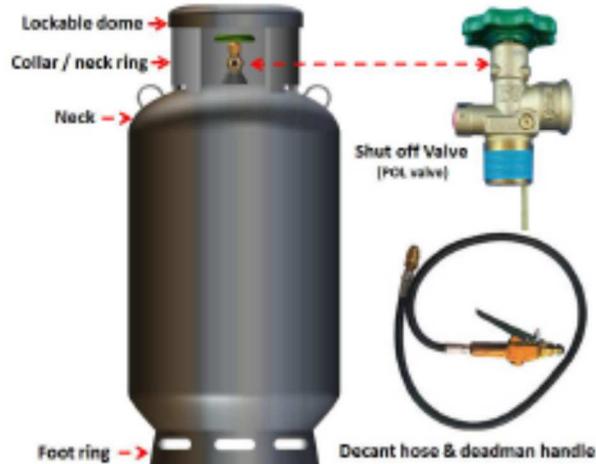
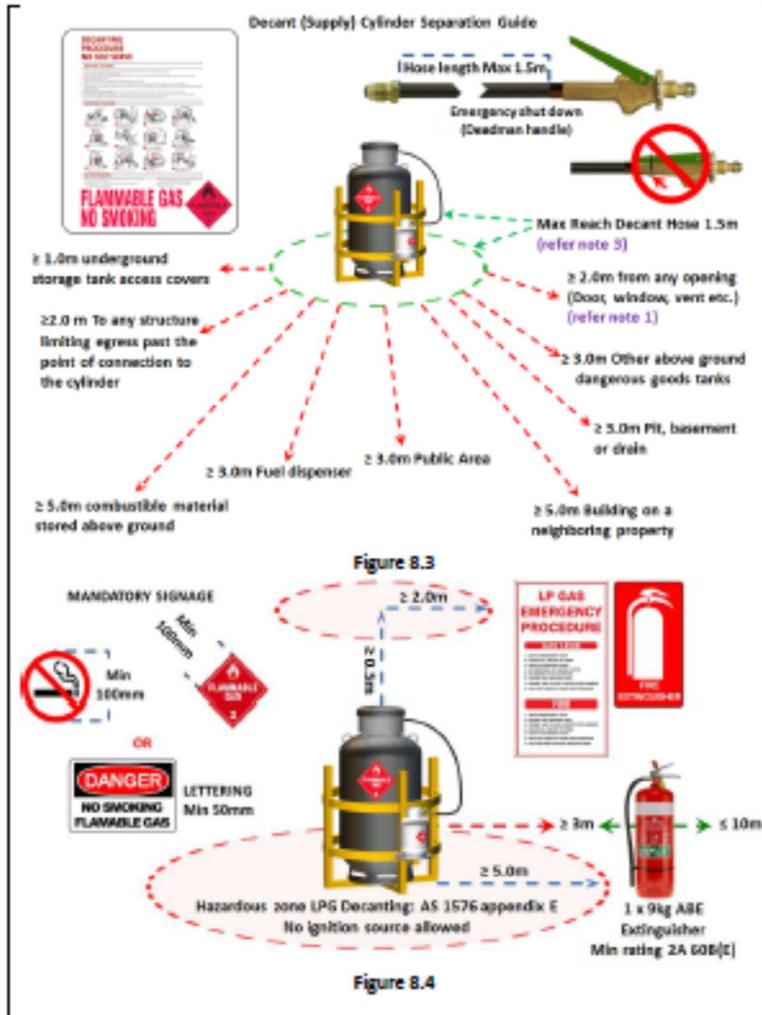


Figure 8.2

- 1 Supply (decant) cylinder less than 10 years old or retested and stamped? (refer Figure 8.1)
- 2 Decant cylinder stable & in an upright position?
- 3 Decant cylinder located:
 - i on the ground in a static position?
 - ii 2. Outdoors with adequate cross flow ventilation?
- 4 Decant cylinder location:
 - i Recommended separation distances maintained? (ref: Figure 8.3)
 - ii No ignition sources within hazardous zone (ref: figure 8.4)
- 6 Means to prevent decanting equipment being tampered with whilst cylinder is unattended?
- 7 Decant cylinder & equipment maintained in a safe operational condition?
- 8 Emergency shut-down (Deadman handle) working correctly
- 9 Deadman's lever not able to be held open by any means other than the operator's hand?
- 10 Decant hose maximum 1.5 metres in length? (Refer figure 8.3 & note 3)
- 11 Impact protection in place? i.e. guardrail, bollards, cage etc. (WHSR 358 & AS1596 app Q)
- 12 Required safety signs present, suitably located & legible? (WHSR 353)
- i Standard symbols of at least 100 mm diameter for 'flammable gas' and 'no smoking' or
- ii warning notice in letters not less than 50 mm high, reading FLAMMABLE GAS, NO SMOKING
- 13 Instructions for decanting present, suitably located, legible, satisfactory?
- 14 Correct placarding present, suitably located & legible? (WHSR 355)
- 15 Instructions for decanting present, suitably located, legible, appropriate?
- 16 PPE readily available, properly maintained & used by operator whilst decanting?
- i Thermal gloves, ii Safety Glasses, iii non-static long sleeve shirt & pant, iv enclosed work boots
- 17 Cylinder being filled placed on the ground or electrically earthed surface? (no plastic crates)
- 18 Emergency instructions in place?
- 19 Appropriate firefighting equipment in place & properly maintained? (WHSR 350)
- i 1 x 9kg ABE Min rating 2A 60B(E) Dry Powder type extinguisher or ≥ 3m - ≤ 10m
- ii Hose reel?
- 20 Decant cylinder valve (POI) turned off whilst not in use?
- 21 Leak testing being carried out? (spray bottle & soapy water available)
- 22 Cylinders being filled inspected & free of defects?
- 23 Operators competent to decant LPG? (adequately trained & experienced Ref: AS1596 App I)
- 24 Operator min 16 years old or greater? (WHSR 336)
- 25 Current SDS readily accessible to operator?



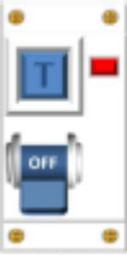
Notes

AS/NZS 1596 8.4.3.3 Location of decanting installation

Note 1 Where an opening into a building is within the hazardous area & remains closed during decanting, the hazardous area is deemed not to enter the building. Where the opening does not remain closed the hazardous area extends inside the building.

Note 2 The separation distances given above and the hazardous area illustrated in Figure 8.3 are based on a single decanting point.

Note 3 The point of connection implies hose reach where a flexible decanting hose is used. Where LP Gas decanting takes place in a dedicated area clearly marked on the ground or on a fixed cylinder stand, the separation distances may be taken from the marked area or stand.

HOT WORK	
<div style="display: flex; align-items: center;">  <div style="font-size: 0.9em;"> <p>Hot work is any process that can be a source of ignition when flammable material is present or can be a fire hazard regardless of the presence of flammable material in the workplace.</p> <p>Common hot work processes are welding, soldering, cutting and brazing.</p> <p>When flammable materials are present, industrial processes such as grinding & drilling become hot work processes.</p> </div> </div>	<div style="display: flex; justify-content: space-between;"> <div style="width: 90%;"> <p>Does the PCBU have a procedure for undertaking hot work? <input type="checkbox"/></p> <p>Does the procedure include the issuing of hot work permits prior to work commencing? <input type="checkbox"/></p> <p>Is the procedure adequate? <input type="checkbox"/></p> </div> <div style="width: 5%; text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> </div> <hr/> <p style="text-align: center; margin: 0;">NOTES</p> <hr/> <hr/> <hr/> <hr/>
ELECTRICAL SAFETY	
<div style="display: flex; flex-direction: column; align-items: center;"> <div style="display: flex; justify-content: space-around; width: 100%;"> <div style="text-align: center;">  <p>R C D</p> </div> <div style="text-align: center;">  <p>CIRCUIT BREAKER</p> </div> </div> <div style="margin-top: 20px; text-align: center;">  <p style="font-size: 0.8em; margin-top: 5px;"> Significant switchboard 5kg CO2 extinguisher </p> </div> </div>	<div style="display: flex; justify-content: space-between;"> <div style="width: 90%;"> <p>Is any part of the workplace considered a hostile environment? re: WHSR 164 WHSR 164 Use of socket outlets in hostile operating environment <input type="checkbox"/></p> <p>If yes, are there Residual Current Devices (RCDs) in place? WHSR 164(2) <input type="checkbox"/></p> <p>Are the RCDs being tested regularly by a competent person? WHSR 165(1) <input type="checkbox"/></p> <p>Are there RCD test records available on site? WHSR 165(2) <input type="checkbox"/></p> <p>Unsafe electrical equipment not in use WHSR 149 <input type="checkbox"/></p> <p>Inspection and testing of electrical equipment undertaken WHSR 150 <input type="checkbox"/></p> <p>Untested electrical equipment not in use at workplace WHSR 151 <input type="checkbox"/></p> <p>Test records kept & available: WHSR 154 (4) <input type="checkbox"/></p> <p>Min 1 x 5kg CO2 extinguisher ≥ 3m & ≤ 20m from significant power boards AS2444 c4.4.2 <input type="checkbox"/></p> <p>CO2 extinguisher is the closest extinguisher significant power boards AS2444 c4.4.2 <input type="checkbox"/></p> <p>Switchboards free of dust and other contaminant? <input type="checkbox"/></p> </div> <div style="width: 5%; text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> </div> <p style="font-size: 0.8em; margin-top: 10px;"> Notes: AS 2444 Portable fire extinguishers and fire blankets—Selection & location 1.4.9 Significant switchboard A switchboard that is— (a) located within a required exit; (b) neither constructed nor installed in accordance with the requirements of AS 3000 (c) an emergency service switchboard; (d) connected to 3-phase power; or (e) vertically aligned and servicing a floor in a building of two or more storeys. c4.4.2 Significant switchboards An extinguisher shall be located between 2 and 20 m from any significant switchboard. A 5 kg carbon dioxide extinguisher, or another type of extinguisher having a minimum classification of 1A:E and fitted with a hose, shall be provided and shall be the extinguisher closest to the switchboard. </p>

LPG Dispensers Reference AS/NZS 1596 Section 10 & appendix D



Ref AS 60079 Explosive Atmospheres ZA.4.4.2.7

LP GAS EMERGENCY PROCEDURE

- 1 Shut emergency stop.
- 2 Close all valves of units.
- 3 Empty fuel lines into a safe container.
- 4 Do not smoke, use naked flames, or use mobile phones.
- 5 Place the dispenser in a safe location.
- 6 Place the hose in a safe location.
- 7 Place the hose in a safe location.
- 8 Insure the hose is in a safe location.

LP GAS WARNING

LEGALLY FLAMMABLE LIQUID UNDER PRESSURE

- No smoking
- No naked flames
- No mobile phones
- No smoking
- Do not use LPG for any other use
- Do not use LPG for any other use
- Do not use LPG for any other use

STOP ENGINE-NO SMOKING

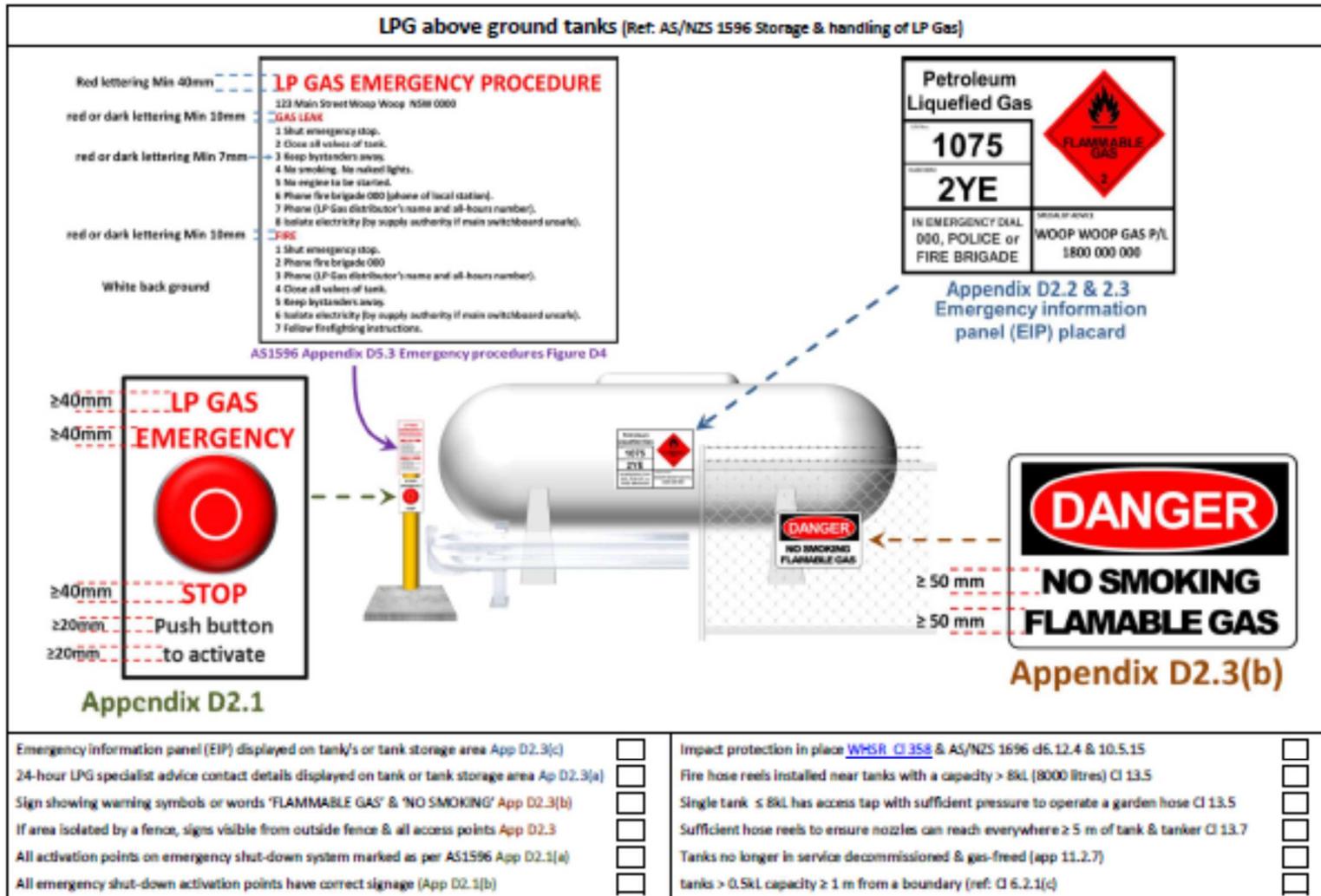
≥ 50mm dia

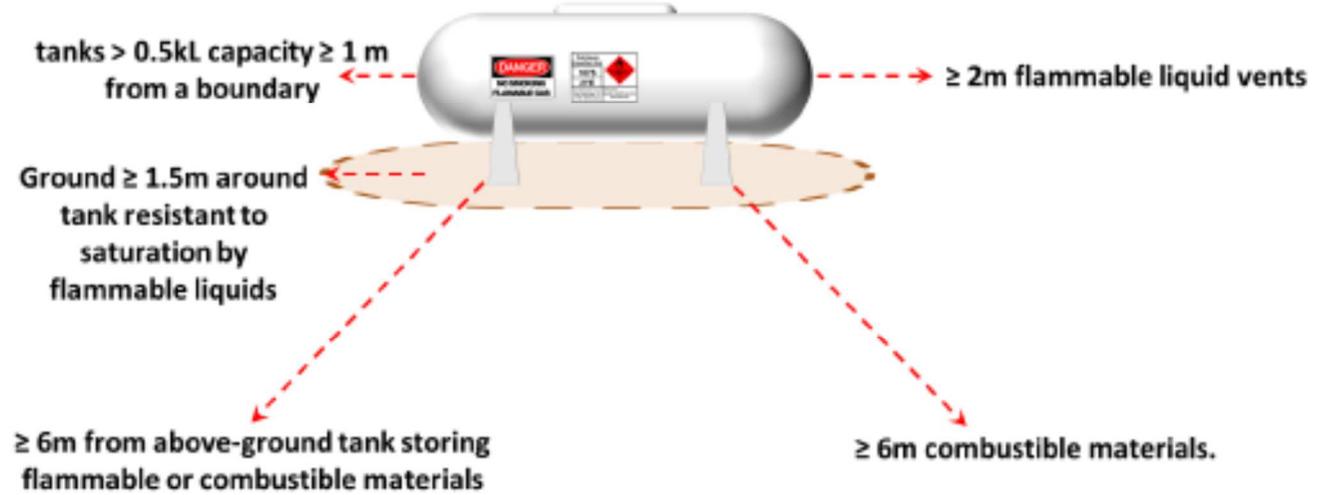
≥ 100mm dia

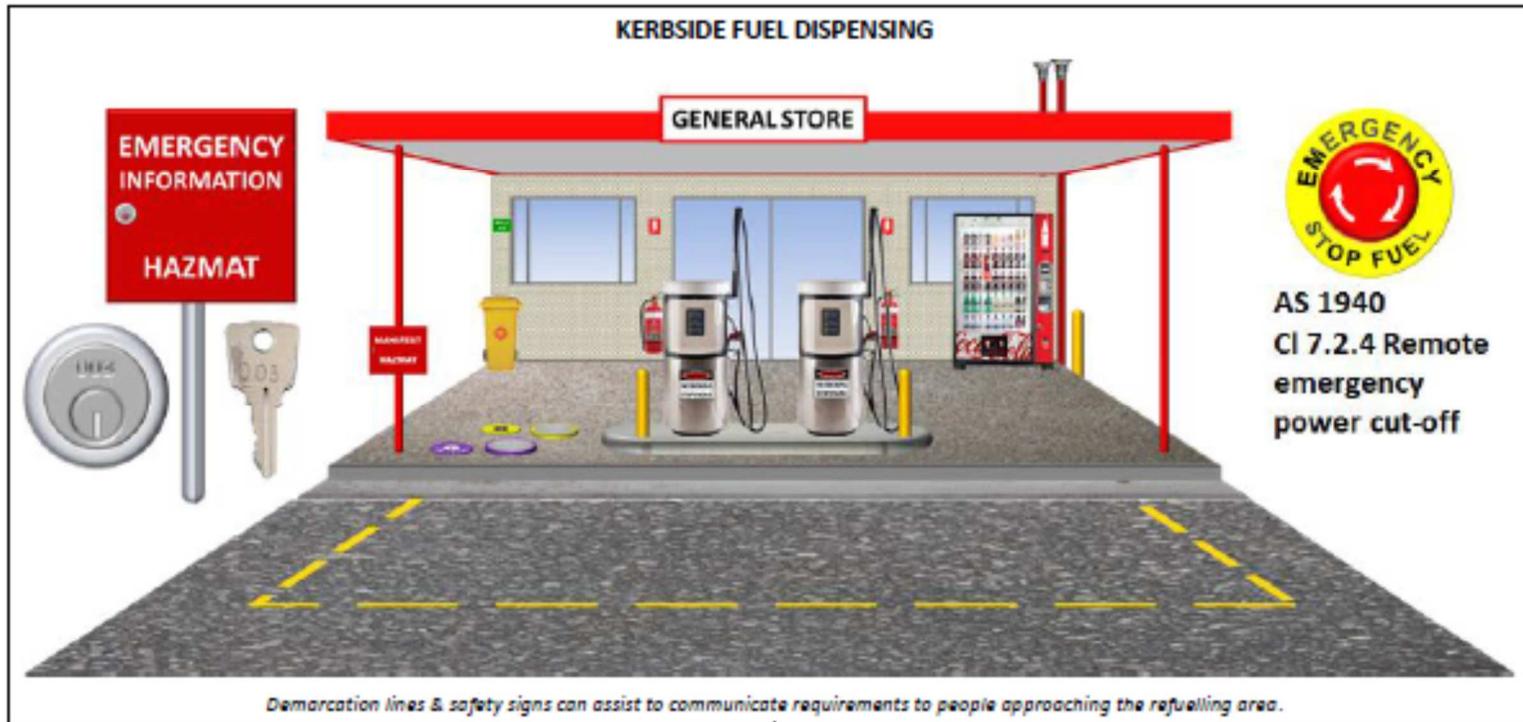
1m past max hose reach zone

Figure D2(a) Figure D2(b) Figure D3 Figure D4 Figure D5

- Stop Engine-No Smoking symbols or sign displayed & readable in filling area Re: fig: D2(a) or (b)
- Driver instructions displayed in readily visible location on or near dispenser Re: fig D2(a)
- Emergency procedure prominently displayed near dispensers & inside service station Fig: D3
- LP Gas filling instructions displayed on dispensers Fig: D4
- Filling area adequately illuminated whilst in operation (Min 50 Lux) CI 10.2.2.1
- Impact protection in place (WHSB CI 358, AS/NZS 1596 CI 10.5.15)
- dispenser nozzles able to be locked to dispenser when not in operation CI 10.5.17
- Fuel not released if trigger opened whilst nozzle is not connected to vehicle CI 10.3.4
- Min 2 x 9kg Powder type fire extinguishers CI 11.9.1
- Fire extinguishers min rating 2A6B(E) CI 11.4.2(a)
- Fire extinguishers near dispensers in a readily accessible & easily identifiable location CI 11.3.3
- Hose reach zone does not allow vehicle being refuelled to be in a public place CI 10.2
- No public or protected places within hose reach zone CI 10.2
- No Entrances, buildings, pits, enclosed drains, or basements in hose reach zone CI 10.2
- No above-ground flammable liquid tanks in hose reach zone CI 10.2
- Distance between hose reach zone & fill connection between tanker & tank ≥ 6m CI 10.2
- LPG dispensers ≥10m from above-ground LPG tank CI 10.2
- Main emergency stop in place (Console) to shut off power to all dispensing units CI 7.2.4
- Main emergency stop in a readily accessible & unobstructed location CI 7.2.4
- Main emergency stop clearly labeled "EMERGENCY STOP" CI 7.2.5
- Evidence that Emergency stop in test monthly CI 9.3.1(a)
- No nozzle-vehicle connections ≤ 3 m of above-ground LPG tank. CI 10.2
- No nozzle-vehicle connections ≤ 3 m of above-ground flammable liquid installation. CI 10.2
- Nozzle not able to discharge LPG unless nozzle connected to a vehicles filler connection CI 10.2
- Self-service dispensing supervised by attendant at control centre CI 10.5.18.1
- Self-service dispenser clearly visible from console (CCTV permitted)
- Self-service dispensers able to be turned on & off at console (emergency cut-off)
- System in place for console attendant to communicate with dispenser users 10.5.18.3(d)
- Self-serving dispensers unable to be operated until turned on at console
- 2 spare metal automotive filler (fuel) caps available in case a vehicle fill point leaks. CI10.3.5
- Gloves impervious to LPG with forearm & thermal protection provided with filler caps CI10.3.5



LPG above ground tanks (Ref: AS/NZS 1596 Storage & handling of LP Gas)	
	
<p>Notes: WHSR Cl 51 Managing risks to health & safety</p> <p>(1) A person conducting a business or undertaking at a workplace must manage risks to health & safety associated with a hazardous atmosphere at the workplace.</p> <p>(2) An atmosphere is a hazardous atmosphere if:</p> <p>(a) the atmosphere does not have a safe oxygen level, or</p> <p>(b) the concentration of oxygen in the atmosphere increases the fire risk, or</p> <p>(c) the concentration of flammable gas, vapour, mist or fumes exceeds 5% of the LEL for the gas, vapour, mist or fumes, or</p> <p>(d) combustible dust is present in a quantity & form that would result in a hazardous area</p> <p>WHSR Cl 52 Ignition sources</p> <p>A person conducting a business or undertaking at a workplace must manage risks to health & safety associated with an ignition source in a hazardous atmosphere at the workplace</p> <p>53 Flammable & combustible material not to be accumulated</p> <p>(1) A person conducting a business or undertaking at a workplace must ensure that, if flammable or combustible substances are kept at the workplace, the substances are kept at the lowest practicable quantity for the workplace.</p> <p>(2) In this clause, flammable or combustible substances include:</p> <p>(a) flammable & combustible liquids, including waste liquids, in containers, whether empty or full, &</p> <p>(b) gas cylinders, whether empty or full.</p>	<p>≥ 2m flammable liquid vents (ref: 6.2.5(c)) <input type="checkbox"/></p> <p>≥ 6 m to any combustible materials. Cl 6.2.5(e) <input type="checkbox"/></p> <p>≥ 6 m from above-ground tank storing flammable or combustible materials (Ref d 6.2.5(a)) <input type="checkbox"/></p> <p>≥ 6 m from package store for flammable or combustible materials <input type="checkbox"/></p> <p>≥ 6 m from flammable or combustible materials filling area <input type="checkbox"/></p> <p>Ground below & ≥ 1.5m around tank resistant to saturation by flammable liquids Cl 10.5 <input type="checkbox"/></p>
<p>Notes</p> <p>Ref: AS 1596 clause 13.5.1 Site evaluation for fire fighting equipment i.e. fire hose reels, tap water, fire extinguishers, etc.</p> <hr/> <hr/> <hr/>	



Kerbside fuel dispensing

Kerbside refuelling was once a wide spread practice in smaller communities, they generally consisted of one or two dispensers (bowsers) located on & underground tanks located below a footpath area.

Risks of kerbside fuel dispensing

The additional risks associated kerbside fuel dispensing include:

- spills during filling of underground tanks & fuel dispensing to customers
- impact & damage to dispensers
- uncontrolled ignition sources (i.e. smoking by non-customers) associated

with a public area during fuel dispensing & underground tank filling

- traffic volume using the road
- speed of vehicles on adjacent roadway
- pedestrian movements on the footpath
- fuel delivery frequency & time
- age & condition of underground fuel tanks.

It is recognised that older kerbside fuel dispensers do not achieve current best practice. However, ensuring risk control measures are implemented & maintained can reduce the associated risks as far as reasonably practicable if they are implemented & maintained.

Risk control measures - General

Some of the engineering & isolation controls recommended for modern service stations are not feasible for kerbside dispensing. To manage the risk, additional control measures are required depending on the specific circumstances.

Kerbside fuel dispensing operators should:

- protect fuel dispensers from impact by vehicles by installing independent bollards or crash barriers for the dispenser facing the roadway
- prevent unauthorised access by providing lockable dispensers
- define a min 4m exclusion zones for potential ignition sources around the dispenser & 3m around a tank fill point, dip point & vent pipe
- clearly identify the exclusion zone using demarcation lines & safety signs (i.e. 'No Smoking, No Ignition Sources') that are clearly visible from normal approaches to the exclusion zone
- provide full-service Refuelling & prevent self-filling by customers (fuel dispensing must only be conducted by trained staff)
- prevent the public from entering an exclusion zone or stop the dispensing operation in the event of an ignition source in the area
- Keep the designated exclusion zone free of combustible matter such as paper, cardboard & litter bins.

Risk control measures – Refilling storage tanks

For hazards related to filling an underground storage tanks by a road tanker operators should:

- restrict fuel delivery to periods where the public are unlikely to visit the premises (i.e. outside normal operating hours)
- set up temporary bollards & safety signs to isolate the area (safety cones or similar devices placed on the roadway between tanker & traffic may be used to define the unloading area & to help ensure separation distances are achieved)
- provide supervision of the filling area to prevent anyone from introducing ignition sources in the exclusion area during filling operations
- maintain a tight seal on the fill & dip point covers to prevent entry of extraneous matter
- develop & document safe work procedures & clearly define emergency actions & ensure appropriate resources & equipment (e.g. fire extinguisher, spill clean-up kit, non-combustible drain plug) are readily available in an emergency
- provide training to responsible persons covering safe work procedures & emergency actions & document this activity (training content, who & when).



Appendix 2. Interview guides

Appendix 1.1. Businesses interview guide

Introduction

Firstly, I want to thank you for making the time for this interview.

Commerce Regulation under the Department of Finance, Services and Innovation is conducting an evaluation of the Regional and Remote Service Station collaborative project. We understand that you received a visit from a SafeWork inspector, [name of the inspector], on [date of the visit].

The objective of this interview is to:

- Collect your feedback about your experience of the visit and the impact it had on your business
- Identify what aspects have worked well and what aspects could be improved in future projects like this one.

The interview should take around 30'. Hopefully, we'll be able to cover everything but feel free to send me an email afterwards if you think of anything else we haven't covered. Or we would be happy to give you another call to complete the interview if we run out of time.

[Note for the interviewer: for questions we prompt, don't prompt response options straight away, only prompt if no clear answers]

1. Before we start, may I ask you what type of business you are?
 - Service station, any other business?
 - Privately owned?
 - Franchisee, Part of a network?

Overall visit experience

2. Can you please describe your experience of the visit?
3. What made it a positive experience?
 - Prompt:
 - Timeliness
 - Respectfulness

- Level of expertise
 - Useful advice provided – provide examples
4. What made it a negative experience?
 5. To what extent do you agree or disagree with the following statement? Agree/ Tend to agree/ tend to disagree/ Disagree/ Don't know/ Not applicable
 - I was treated fairly
 - I had valuable and worthwhile interactions during the visit
 - The inspector recognised our efforts in managing WHS and Return to Work
 - The visit increased my confidence in approaching WHS and Return to Work
 - The inspector had enough knowledge to address issues
 6. How does that compare with other similar inspections you had in the past?
 - Prompt: more or less burdensome
 7. Did you take up the safety rebate following the visit?
 - Yes/ No/ Not sure
 - How did you use it? Prompt:
 - to buy a manifest box
 - other types of use

Collaborative aspect

8. Were you aware that this visit involved components from two agencies, SafeWork as well as Fair Trading? Yes/ No/ Not sure
9. What are your thoughts about this? A good thing/ Doesn't change much/ Additional burden.
10. How do you feel about the number of contacts from regulatory agencies in general?
 - Provide example to support claims
11. Did your perception change around contacts from regulatory agencies as a consequence of this visit?
 - Yes/ No/ Not sure
 - How?
 - Reduced contacts with NSW government

- Reduced regulatory burden

Impact on compliance

12. As a result of the visit, would you say that your level of confidence in meeting WHS requirements has changed?
 - o Yes/ No/ Not sure
13. If yes, how did the visit contributed to this?
14. Can you provide examples of what you changed in your WHS practices following the visit of the SafeWork inspector?
15. What about price signage and FuelCheck?
 - o Did you change anything around that after the visit?

Overall – wrapping up

16. If you had one thing to change in the way the visit was conducted, what would it be?
17. What is the one thing you would NOT change?
18. Other comments?

We're coming to the end of the interview. Thank you for your time and your contribution to the evaluation. Feel free to send me any additional comment you may think of afterwards. Here is my email if you want to send me any additional comments: XX.XX@finance.nsw.gov.au.

Appendix 1.2. Inspectors interview guide

Introduction

Firstly, I want to thank you for making the time for this interview. We understand that you have conducted several visits as part of this project.

This interview is part of the evaluation of the Regional and Remote Service Stations project conducted by the Commerce Regulation Program. Other evaluation methods include interviews with businesses, interview with internal and project stakeholders, a site visit observation and analysis of project data – WSMS data and Fair Trading data.

The objective of this interview is to:

- Collect your feedback about the design of the project, your experience of the visits to businesses, with a particular focus on the collaborative component
- Identify what aspects have worked well and what aspects could be improved in future collaborative projects like this one.

The interview should take around 45'. Hopefully, we'll be able to cover everything but feel free to send me an email afterwards if you think of anything else we haven't covered. Or we would be happy to give you another call to complete the interview if we run out of time.

[Note for the interviewer: for questions we prompt, don't prompt response options straight away, only prompt if no clear answers]

Project design

1. What is your understanding of the objectives of the project in your own words?
2. Did that understanding change over the course of the project? Is it different from what you understood of the project initially?
3. What are your views about the material that was developed as part of the project?

Project documentation	What worked well	What could be improved
Inspectors guide		
Self-Audit tool		
Webinar/ Inspector briefing		
Appendices		
<Other project documentation, to specify>		

Project delivery

4. How did you select sites to be visited?
5. Do you feel you were able to visit the types of service stations targeted by the project, i.e. small independently owned 'mum and dad' type's service stations operating in regional and remote New South Wales?
 - To what extent? All of the ones I visited/ Some of them/ A few of them/ None of them were this type of service station
 - Would you have missed many of those in your area? Yes/ No/ Not sure
 - Why?
 - What makes it difficult to identify these types of businesses?
6. How long did the visit take you in average?
7. What did you do differently as part of this project as compared to other SafeWork projects in the past?
 - Prompt

- in terms of the way you conducted your inspection visit?
 - in terms of the way you worked with other government agencies?
8. If anything different, do you think you will continue doing some of this after completion of the project?

Project outcomes

9. As a result of the visit, do you feel that service stations have improved their level of compliance?
- Yes/ No/ Not sure
 - What makes you think that?
 - What about the FT component (fuel price and FuelCheck)?
10. Did you see any pattern in terms of the types of businesses and their level of compliance?
11. What form did the collaborative component of the project take?
- Prompt:
 - Data collection and sharing
 - Capacity building, e.g. learning some new knowledge or skills
 - Other, please specify
12. What were the main challenges, if any, you experienced with the collaborative component of the project?
13. What do you see as the main benefits, if any, of the collaborative component of the project?
- For you and other inspectors
 - For businesses. Prompt: reduced touch points with businesses, lower disturbance
 - For the local community
 - For partner agencies, i.e. SafeWork and Fair Trading
 - For the whole-of –government
14. In general, how supportive are you of collecting additional information for another agency?
- Very supportive/ Somewhat supportive/ Somewhat not supportive/ Not supportive at all
 - Why?

15. Do you feel that this project in particular contributed to improve collaboration between partner agencies (SafeWork, Fair Trading, and CRP)?
- Yes/ No/ Not sure
 - How?
16. Do you feel that more could be done in terms of more collaboration?
- Yes/ No/ Not sure
 - How?
17. What would be the main limitations to more collaboration/ integration between agencies?
Prompt:
- Different expertise
 - Different timing of the contact with businesses
 - Different focus
 - Different culture
 - Data systems

Overall – wrapping up

18. If you had to design another project like this tomorrow, what is the one thing you would change?
- In terms of the overall project design
 - With regard to the collaborative component in particular
19. What is the one thing you would NOT change?
- In terms of the overall project design
 - With regard to the collaborative component in particular
20. Previous reviews or evaluations of pilot collaborative projects identified the following issues and recommendations. To what extent do you feel that these are still valid?

Issue/ recommendation	To what extent is this a valid issue/ recommendation?
Lack of warning to allow for the right business representative to be made available on the day of the visit	

No actual reduction in regulatory burden for businesses	
Need for a single document recording system (TRIM)	
Need for a single data recording system	
Need for a joint staff directory across partner agencies	
Opportunity to develop a referral process for inspectors doing the visits to refer issues identified to appropriate agencies	

21. Other comments

We're getting to the end of the interview. Thank you for your time and your contribution to the evaluation. Feel free to send me any additional comment you may think of afterwards.

The next steps for us are to analyse the feedback provided, analyse it together with other evaluation methods, e.g. WSMS data analysis and answer the key evaluation questions into an evaluation report.

We're planning to provide inspectors with some feedback about key findings and recommendations from the evaluation – the format is still to be decided, but it could be as part of an end of project inspector debrief session.

Appendix 1.3. Internal stakeholders' interview guide

Introduction

This interview is part of the evaluation of the Regional and Remote Service Stations project conducted by the Commerce Regulation Program. Other evaluation methods include interviews inspectors, businesses and external project stakeholders, a site visit observation and analysis of project data – WSMS data and Fair Trading data.

The objective of this interview is to:

- Collect your feedback about the design of the project, how it was delivered and your views about what it achieved in terms of outcomes, with a particular focus on the collaborative component
- Identify what aspects have worked well and what aspects could be improved in future collaborative projects like this one.

The interview should take around 45'. Hopefully, we'll be able to cover everything but feel free to send me an email afterwards if you think of anything else we haven't covered. Or we would be happy to give you another call to complete the interview if we run out of time.

[Note for the interviewer: for questions we prompt, don't prompt response options straight away, only prompt if no clear answers]

1. Before we start, can you briefly describe your involvement in the project?

Project design

2. What is your understanding of the objectives of the project?
3. Did that understanding change over the course of the project? How?
4. What are your views about the process that lead to the design of the project? Prompt:
 - Right level of engagement with the right stakeholders (staff, industry)
 - Appropriate analysis of existing data, e.g. to ascertain level of compliance
5. To what extent do you feel the project is targeting the right industry with regard to the project objectives in terms of
 - improving compliance: does it offer sufficient room for improvement in this regard?
 - generating synergies: does it offer sufficient potential in this regard?
 - improving customer experience: does it offer sufficient room for improvement in this regard?

Project delivery

6. How was your experience of the delivery of the project?
7. How does that compare to BAU and other SafeWork/ Fair Trading projects?
8. How does that compare to similar collaborative projects?
9. What are your views about the process to select sites for inspection?
 - To what extent did the process allow to target appropriate sites with regard to the objectives of the project?
10. How did the agencies collaborate as part of the project? Prompt:
 - Joint governance
 - Joint internal communication
 - Joint compliance activities

- Joint external communication activities
 - Data sharing
 - Informal knowledge sharing
11. What benefits do you see for each of the partner agencies? Prompt:
- Industry knowledge/ evidence/ business intelligence
 - Savings
 - Can you please provide practical examples for these benefits?
12. Do you think that more could have been done in terms of collaboration?

Project outcomes

Now, we will talk about outcomes achieved by the project. We identified three main areas of outcomes: business compliance, customer experience and collaboration between agencies.

13. What are your views on what the project has been able to achieve in terms of improving business compliance?
- How do you feel the project contributed to improve this aspect?
 - How could that be turned into BAU?
 - What else could be done to improve that aspect?
 - What were the main limitations to that?
14. What are your views on what the project has been able to achieve in terms of improving customer experience?
- How do you feel the project contributed to improve this aspect?
 - How could that be turned into BAU?
 - What else could be done to improve that aspect?
 - What were the main limitations to that?
15. What are your views on what the project has been able to achieve in terms of improving collaboration between agencies?
- How do you feel the project contributed to improve this aspect?
 - How could that be turned into BAU?
 - What else could be done to improve that aspect?

- What were the main limitations to that?

Overall – wrapping up

16. If you had to design another collaborative project tomorrow, what is the one thing you would change?
17. What is the one thing you would NOT change?
18. Previous reviews or evaluations of pilot collaborative projects identified the following issues and recommendations. To what extent do you feel that these are still relevant and important?

Issue	To what extent is this still a valid issue/ recommendation?
Lack of warning to allow for the right business representative to be made available on the day of the visit	
No actual reduction in regulatory burden for businesses	
Need for a single document recording system (Trim)	
Need for a single data recording system	
Need for a joint staff directory across partner agencies	
Opportunity to develop a referral process for inspectors doing the visits to refer issues identified to appropriate agencies	

19. Other comments

We're getting to the end of the interview. Thank you for your time and your contribution to the evaluation. Feel free to send me any additional comment you may think of afterwards.

The next steps for us are to analyse the feedback provided, analyse it together with other evaluation methods, e.g. WSMS data analysis and answer the key evaluation questions into an evaluation report.

We're planning to provide inspectors with some feedback about key findings and recommendations from the evaluation – the format is still to be decided, but it could be as part of an end of project inspector debrief session.

Appendix 1.4. External stakeholders' interview guide

Introduction

This interview is part of the evaluation of the Regional and Remote Service Stations project conducted by the Commerce Regulation Program. Other evaluation methods include interviews inspectors, businesses and external project stakeholders, a site visit observation and analysis of project data – WSMS data and Fair Trading data.

The objective of this interview is to:

- Collect your feedback about the design of the project, how it was delivered and your views about what it achieved in terms of outcomes, with a particular focus on the collaborative component
- Identify what aspects have worked well and what aspects could be improved in future collaborative projects like this one.

The interview should take around 45'. Hopefully, we'll be able to cover everything but feel free to send me an email afterwards if you think of anything else we haven't covered. Or we would be happy to give you another call to complete the interview if we run out of time.

[Note for the interviewer: for questions we prompt, don't prompt response options straight away, only prompt if no clear answers]

22. Before we start, can you briefly describe your involvement in the project?

Project design

23. What is your understanding of the objectives of the project?

24. Did that understanding change over the course of the project? How?

25. Did you feel you had sufficient opportunities to contribute to the design of the project?

- What are your views on the actual design of the project?

Project delivery

26. What was your involvement during the delivery of the project?

27. Do you feel that your level of involvement was sufficient and commensurate to how impacted you were by the project?

Project outcomes

Now, we will talk about outcomes achieved by the project. We identified three main areas of outcomes: business compliance, customer experience and collaboration between agencies.

28. What are your views on what the project has been able to achieve in terms of improving business compliance?
 - How do you feel the project contributed to improve this aspect?
 - How could that be turned into BAU?
 - What else could be done to improve that aspect?
 - What were the main limitations to that?
29. What are your views on what the project has been able to achieve in terms of improving customer experience?
 - How do you feel the project contributed to improve this aspect?
 - How could that be turned into BAU?
 - What else could be done to improve that aspect?
 - What were the main limitations to that?
30. What are your views on what the project has been able to achieve in terms of improving collaboration between agencies?
 - How do you feel the project contributed to improve this aspect?
 - How could that be turned into BAU?
 - What else could be done to improve that aspect?
 - What were the main limitations to that?

Overall – wrapping up

31. If you had to contribute to the design of another collaborative project tomorrow, what is the one thing you would change?
32. What is the one thing you would NOT change?
33. Other comments

We're getting to the end of the interview. Thank you for your time and your contribution to the evaluation. Feel free to send me any additional comment you may think of afterwards.

The next steps for us are to analyse the feedback provided, analyse it together with other evaluation methods, e.g. WSMS data analysis and answer the key evaluation questions into an evaluation report.

We're planning to provide inspectors with some feedback about key findings and recommendations from the evaluation – the format is still to be decided, but it could be as part of an end of project inspector debrief session.



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