

Broadlands

Work Health & Safety (WHS) Management Plan

Document Version Control

Version	Date	Details
1.0	January 2026	<ul style="list-style-type: none">Implementation of WHS Management Plan

WHS Management Plan Revisions

The table below records all revisions made to the WHS Management Plan. This plan will be reviewed and updated as required to ensure ongoing compliance with applicable Work Health and Safety (WHS) legislation and to reflect changes in operations, activities, or regulatory requirements.

System-level updates will be identified using whole revision numbers. Operational or site-specific updates will be identified using decimal revision numbers. For example, Revision 1.0 represents the initial issue of the plan, Revision 1.1 represents a minor update, and subsequent decimal revisions may reflect changes to work practices, personnel, or legislative requirements.

Revision	Date Revised	Comments / Changes Summary
1.1	January 2026	<ul style="list-style-type: none">Initial implementation of WHS Management Plan
1.2	February 2026	<ul style="list-style-type: none">Updated from Audit review

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1 Purpose

This Work Health and Safety (WHS) Management Plan establishes the framework adopted by BBB Lifestyle Living Pty Ltd (“the business”) and its subsidiaries and related entities to manage work health and safety risks arising from residential land lease community operations and caravan park operations. The purpose of this plan is to ensure, so far as is reasonably practicable, the health and safety of workers, contractors, residents and visitors across all business operations and locations.

2 Scope

This WHS Management Plan applies across all business operations and locations operated by BBB Lifestyle Living Pty Ltd and its subsidiaries and related entities, including:

- BBB Lifestyle Living Pty Ltd – located at 22-24 Junction St, Forest Lodge NSW 2037
- Green Point Lifestyle Living Pty Ltd, known as Broadlands Green Point – located at 9 Milpera Road, Green Point NSW 2251
- Muswellbrook Lifestyle Living Pty Ltd, known as Broadlands Muswellbrook – located at 9080 New England Highway, Muswellbrook NSW 2333
- Tamworth Lifestyle Living Pty Ltd, known as Broadlands Tamworth – located at 19-51 Warral Road, West Tamworth NSW 2340
- Armidale Lifestyle Living Pty Ltd, known as Armidale Tourist Park – located at 39 Grafton Road, Armidale NSW 2350

This plan provides the overarching WHS framework for the entire business. Community specific hazards and controls are managed through individual **Community Safety Plan** for each community.

This plan applies to:

- All employees (including full time, part time and casual staff); and
- Contractors and subcontractors; and
- Volunteers (if applicable).

Residents, visitors and members of the public are not inducted into the WHS management system. However, this plan and the associated Community Safety Plans are implemented to identify, assess and control risks that may affect residents, visitors and the public, so far as is reasonably practicable, in accordance with the NSW Work Health and Safety Act 2011.

3 WHS Policy, Framework & Hierarchy

3.1 WHS Policy

BBB Lifestyle Living Pty Ltd is committed to providing, so far as is reasonably practicable, a safe and healthy workplace for workers and other persons who may be affected by its operations. This commitment is achieved by:

- Identifying and managing work health and safety hazards and risks
- Complying with the NSW Work Health and Safety Act 2011 and associated Regulations
- Consulting with workers and contractors on work health and safety matters
- Providing appropriate information, instruction, training and supervision
- Continually improving work health and safety performance

This policy applies to all work activities undertaken by the business and to all persons engaged by, or carrying out work on behalf of, the business.

All workers and contractors have a responsibility to work safely and to comply with this WHS Management Plan and all associated WHS procedures.

3.2 WHS Framework

This WHS Management Plan establishes the overarching framework for managing work health and safety across the businesses operations.

This framework is supported by a structured set of WHS documents that together ensure risks are identified, assessed and controlled. These include:

- WHS Risk Register (*Appendix D*)
- Community Safety Plans for each site:
 - Site-specific WHS risk registers
 - Safe Work Procedures (SWPs)
 - Induction, training and maintenance records.



Safe Work Procedures describe the safe methods for undertaking specific tasks and activities and are developed in response to identified hazards and assessed risks. These procedures are implemented through worker and contractor induction, task-specific training, supervision and ongoing consultation.

3.3 Hierarchy

BBB Lifestyle Living Pty Ltd maintains a clear and simplified hierarchy of WHS documentation to ensure consistency, clarity and effective risk management across all operations and locations.

1. WHS Management Plan - establishes the overarching WHS policy, governance arrangements and minimum requirements applicable across all business operations.
2. Apply the requirements of this WHS Management Plan at each site by identifying site-specific hazards, risks, controls, emergency arrangements and local procedures relevant to each community.
3. Risk registers document identified hazards and associated control measures, while Safe Work Procedures describe how work activities are to be carried out safely in practice.

Training, inspection and maintenance activities that support the effective implementation of these controls are documented and recorded within each Community Safety Plan.

3.4 Document Ownership & Control

This WHS Management Plan is owned and maintained by BBB Lifestyle Living Pty Ltd and applies across all business operations.

Community Safety Plans are owned and maintained at a community level and are overseen by the relevant Community Manager or delegated site representative.

Site-based WHS records, including risk registers, inspection records, maintenance checks and training records, are maintained within the relevant Community Safety Plan to ensure they remain current, accessible and specific to the community location.

4 Legal and other requirements

The business is committed to complying with all applicable work health and safety legislation and standards.

This WHS Management Plan has been developed in accordance with, and is intended to meet the requirements of, the following legislation and guidance material, as amended from time to time:

- Work Health and Safety Act 2011 (NSW)
- Work Health and Safety Regulation 2017 (NSW)
- Relevant Codes of Practice issued by SafeWork NSW

The business will monitor changes to WHS legislation, regulations and Codes of Practice and update this WHS Management Plan and associated procedures where required to maintain compliance.

Compliance with applicable legal and regulatory requirements is a minimum standard, and the business will implement additional controls where reasonably practicable to ensure the health and safety of workers, contractors, residents and visitors.

5 Roles & Responsibilities

5.1 Person Conducting a Business or Undertaking (PCBU) / Senior Management

- Provide and maintain a safe work environment
- Ensure WHS systems are implemented and maintained
- Provide resources to manage WHS risks
- Ensure incidents are reported and investigated

5.2 Managers / Supervisors

- Implement this WHS Management Plan
- Conduct workplace inspections
- Ensure workers are trained and supervised
- Consult with workers on WHS issues

5.3 Workers

- Take reasonable care for their own health and safety
- Follow WHS procedures and instructions
- Report hazards, incidents and near misses
- Use Protective Personal Equipment (PPE) correctly

5.4 Contractors

- Comply with this WHS Management Plan
- Provide SWMS where required
- Hold appropriate licences and insurance

6 Consultation

The business is committed to effective consultation with workers and other relevant duty holders in accordance with the *Work Health and Safety Act 2011 (NSW)*.

Consultation is undertaken to ensure workers are given a reasonable opportunity to express views and contribute to decision-making on matters that may affect their health and safety.

Consultation will occur:

- When identifying hazards and assessing WHS risks
- When making decisions about risk control measures
- When proposing changes to work practices, equipment, staffing or site conditions
- Following incidents, near misses or hazard reports
- When developing, implementing or reviewing WHS policies, procedures and specific Community Safety Plan

Consultation methods may include:

- Toolbox talks
- Team and site meetings
- One-on-one discussions
- Site walk-throughs and inspections
- Circulation of WHS information and draft documents for feedback

Where workers are represented by supervisors or managers, those representatives will be involved in consultation processes.

Records of consultation, including attendees, issues raised, decisions made and actions taken, will be documented and retained.

7 Hazard Identification & Risk Management

The business adopts a structured and systematic approach to hazard identification, risk assessment and risk control to eliminate or minimise risks so far as is reasonably practicable.

Identified hazards, assessed risks and associated control measures applicable across BBB Lifestyle Living Pty Ltd operations are documented in WHS Risk Register (Appendix D).

Hazard identification and risk assessments for community locations are maintained within the relevant Community Safety Plan and are overseen by the Community Manager or delegated site representative.

7.1 Hazard Identification

Hazards identification is undertaken on an ongoing basis and may occur through:

- Workplace inspections and observations
- Consultation with workers and contractor
- Incident, injury, hazard and near miss reporting
- Review of work activities, plant, equipment and substances
- Changes to work environments, staffing, processes or site conditions

7.2 Risk Assessment

Once a hazard is identified, the associated risk is assessed by considering:

- The likelihood of the hazard causing harm
- The potential severity of injury or illness

Risk assessments may be documented using:

- Site risk registers
- Job Safety Analysis (JSAs)
- Safe Work Method Statements (SWMS), where required.

7.3 Risk Control

Risks are controlled in accordance with the hierarchy of controls:

1. Elimination
2. Substitution
3. Engineering controls
4. Administrative controls
5. Personal protective equipment (PPE)

Where single control measure is insufficient, multiple controls will be implemented.

7.4 Review of Controls

Control measures will be reviewed:

- At regular intervals (at a minimum yearly)
- Following incidents or near misses
- Where controls are ineffective
- When changes occur to work practises, equipment or site conditions

8 Incident and Hazard Reporting

All hazards, near misses and incidents must be reported as soon as reasonably practicable. Hazard and Near Miss Report forms are included in the appendices to this plan.

Notifiable incidents will be reported to SafeWork NSW immediately.

9 Training, Induction & Records

9.1 Training & Induction

All workers and contractors will be provided with appropriate work health and safety information, instruction, training and supervision to enable them to perform their work safely.

As a minimum, this includes:

- Completion of a WHS induction covering site rules, emergency procedures, and hazard and incident reporting processes.
- Task-specific training relevant to the use of plant, equipment, chemicals and the Safe Work Procedures applicable to the work being undertaken.
- Refresher training and toolbox talks at intervals appropriate to the level of risk, or when work methods, equipment or site conditions change.
- Additional training and instruction for supervisors and managers in relation to their work health and safety responsibilities.

Training, licences and competency evidence will be documented, maintained and kept up to date. Records of training, inductions, inspections and maintenance activities are retained within the Training, Inspection and Maintenance Register (Appendix H) contained within each Community Safety Plan.

9.2 Registers & Records

Operational WHS records, including inspections, maintenance checks, training records and contractor documentation, are maintained within Community Safety Plans to ensure records remain site-specific, current and readily accessible.

10 Contractor Management

BBB Lifestyle Living Pty Ltd engages contractors to undertake maintenance, construction and specialist works across its communities.

All contractors must demonstrate that they are competent and able to perform their work safely and in compliance with the Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2017 (NSW).

Prior to commencing work at any site, contractors must:

- Complete the BBB Lifestyle Living online Contractor Induction;
- Provide current Public Liability and Workers Compensation Certificates of Currency (where applicable);
- Provide evidence of relevant licences, qualifications and high risk work tickets;
- Submit a Safe Work Method Statement (SWMS) for any high risk construction work as defined under Part 6.3 of the WHS Regulation; and
- Receive written approval to commence work from the relevant Community Manager or authorised delegate.

No contractor is permitted to commence work until the above requirements have been satisfied and written approval has been issued.

- For high risk construction work, submitted SWMS must:
Identify hazards associated with the work;
- Detail control measures consistent with the hierarchy of controls;
- Address site-specific risks; and
- Be available onsite during the performance of the work.

BBB Lifestyle Living Pty Ltd reserves the right to suspend works or remove contractors from site where WHS requirements are not met.

Contractor induction records and associated documentation are retained electronically in accordance with the business record retention requirements.

Contractors must comply with the relevant Community Safety Plan for the community in which they are working, including site-specific hazards, controls, emergency procedures and registers. Contractor documentation and induction records will be reviewed and verified prior to work commencing. Work may be suspended or prohibited where contractors fail to meet these requirements or do not comply with site safety rules.

Where a contractor is formally appointed as the Principal Contractor for a project, that contractor is responsible for implementing and maintaining appropriate WHS management systems for the work under their control, including coordination of contractor activities and compliance with all applicable WHS legislation and codes of practice. In these circumstances, BBB Lifestyle Living Pty Ltd will monitor the Principal Contractor's WHS performance and consult and cooperate on WHS matters as required.

11 Emergency Management

Emergency Procedure Handbooks for fire, severe weather, service outages and medical emergencies are in place and available in the Community Safety Plan.

12 Monitoring & Review

Item	What is Reviewed	Review Frequency	Responsibility
WHS Management Plan	<ul style="list-style-type: none"> • Business wide WHS framework, policies and procedures 	<ul style="list-style-type: none"> • Annually 	<ul style="list-style-type: none"> • PCBU / Senior Management
	<ul style="list-style-type: none"> • Effectiveness of controls and systems 	<ul style="list-style-type: none"> • Annually or following a notifiable or serious incident 	<ul style="list-style-type: none"> • PCBU / Senior Management
	<ul style="list-style-type: none"> • Relevance to business operations and locations 	<ul style="list-style-type: none"> • Annually or following significant changes to business operations and locations 	<ul style="list-style-type: none"> • PCBU / Senior Management
Community Safety Plan	<ul style="list-style-type: none"> • Site specific hazards and controls 	<ul style="list-style-type: none"> • Annually and when site conditions or activities change 	<ul style="list-style-type: none"> • Community Manager
	<ul style="list-style-type: none"> • Emergency information and site details 	<ul style="list-style-type: none"> • Annually or following site changes 	<ul style="list-style-type: none"> • Community Manager

HAZARD & INCIDENT REPORT FORM

Use this form to report any health and safety hazards or incidents. You can either complete the form directly in Employment Hero or fill out this version and upload it to Employment Hero.

To notify SafeWork NSW of an incident, call 13 10 50.

HAZARD / INCIDENT

Brief description of hazard/incident:

Describe the task, equipment, tools and people involved. Use sketches, if necessary. Include any action taken to ensure the safety of those who may be affected.

Where is the hazard located in the workplace?

When was the hazard identified?

Date: / / Time: am / pm

Recommend action to fix hazard/incident?

List any suggestions you may have for reducing or elimination the problem – for example re-design mechanical devices, update procedures, improve training, maintenance work.

Date submitted to manager:

Date: / / Time: am / pm

ACTION TAKEN

Has the hazard/incident been acknowledged by management?

Yes / No

Describe what has been done to resolve the hazard/incident:

Do you consider the hazard/incident fixed?

Yes / No

Name:

Position:

Signature:

Date: / /

WHS INDUCTION CHECKLIST

Name of person being inducted:	
Induction date:	
Position:	
Manager/Supervisor:	
Community:	

Explain your business:

The structure	<input type="checkbox"/>
The type of work	<input type="checkbox"/>

List and introduce your key people and their roles:

Manager/Owner	<input type="checkbox"/>
Supervisor(s)	<input type="checkbox"/>
Co-workers	<input type="checkbox"/>
Health and safety representatives(s)	<input type="checkbox"/>
Fire/Emergency warden(s)	<input type="checkbox"/>

Explain your employment conditions:

Name of award or agreement (if relevant) and aware conditions	<input type="checkbox"/>
Job description and responsibilities	<input type="checkbox"/>
Leave entitlements	<input type="checkbox"/>
Notification of sick leave or absences	<input type="checkbox"/>
Out of hours enquiries and emergency procedures	<input type="checkbox"/>
Time recording procedures	<input type="checkbox"/>
Work times and meal breaks	<input type="checkbox"/>

Explain your work health and safety administration:

Consultative and communication processes, including employee health and safety representatives	<input type="checkbox"/>
Hazard reporting, including where to find forms	<input type="checkbox"/>
Incident/accident reporting procedures, including where to find forms	<input type="checkbox"/>
Hazards of work	<input type="checkbox"/>
Policy & procedures	<input type="checkbox"/>
Roles & responsibilities	<input type="checkbox"/>
Employee Assistance Program (EAP)	<input type="checkbox"/>
Works compensation claims	<input type="checkbox"/>

Show your work health and safety environment

Emergency Procedure Handbook	<input type="checkbox"/>
First aid facilities	<input type="checkbox"/>
Information on workplace hazards and controls	<input type="checkbox"/>

Appendix C – WHS Risk Assessment Register

WHS RISK ASSESSMENT REGISTER								
<ul style="list-style-type: none"> This register identifies common hazards, risks and controls across all BBB Lifestyle Living Pty Ltd operations. It applies to all workers, contractors, and activities undertaken across all business locations. It combines both the risk assessment and risk register into a single, consolidated document for use in the WHS Management Plan. Site-specific risks are addressed separately in Site Safety Packs where required. Controls listed within the WHS Risk Register are implemented through a combination of documented procedures, contractor Safe Work Method Statements (SWMS), toolbox talks, training, supervision and site inspections. Site specific implementation and evidence of these controls are maintained within the relevant Community Safety Plan. 								
HAZARD	TYPICAL ACTIVITIES	WHO MAY BE AFFECTED	POTENTIAL HARM	EXISTING CONTROLS	RISK RATING	ADDITIONAL CONTROLS	RESPONSIBILITY	REVIEW REFREQUENCY
Manual handling	<ul style="list-style-type: none"> Lifting Carrying Bending Repetitive tasks 	<ul style="list-style-type: none"> Workers Contractors 	<ul style="list-style-type: none"> Sprains Strains Musculoskeletal injuries 	<ul style="list-style-type: none"> Manual handling protocol Team lifting 	High	<ul style="list-style-type: none"> Mechanical aids Task rotation 	Senior Management / Community Management	6 monthly
Slips, trips & falls	<ul style="list-style-type: none"> Common areas Outdoor paths and roads 	<ul style="list-style-type: none"> Workers Contractors Residents Visitors 	<ul style="list-style-type: none"> Minor to serious injuries 	<ul style="list-style-type: none"> Housekeeping Clear accessways 	Medium	<ul style="list-style-type: none"> Routine inspections 	Community Management	Quarterly
Use of tools and equipment	<ul style="list-style-type: none"> Hand tools Powered tools Light plant 	<ul style="list-style-type: none"> Workers Contractors 	<ul style="list-style-type: none"> Cuts Amputations Impact injuries 	<ul style="list-style-type: none"> Guards fitted PPE Training 	High	<ul style="list-style-type: none"> Pre-start checks Refresher training 	Community Management	Quarterly
Vehicles and mobile plant	<ul style="list-style-type: none"> Driving within community Use of trailers 	<ul style="list-style-type: none"> Workers Contractors Residents Visitors 	<ul style="list-style-type: none"> Collision Serious injury 	<ul style="list-style-type: none"> Speed limits Signage 	High	<ul style="list-style-type: none"> Traffic Management Controls 	Community Management	Quarterly
Hazardous substances	<ul style="list-style-type: none"> Cleaning chemicals Fuels Pesticides 	<ul style="list-style-type: none"> Workers Contractors 	<ul style="list-style-type: none"> Burns Respiratory irritation Skin irritation 	<ul style="list-style-type: none"> SDS available PPE Labelled containers 	High	<ul style="list-style-type: none"> Chemical register Competency training 	Community Management	6 monthly

Working at heights	<ul style="list-style-type: none"> Ladder use Minor roof or gutter access 	<ul style="list-style-type: none"> Workers Contractors 	<ul style="list-style-type: none"> Falls Serious injury 	<ul style="list-style-type: none"> Ladder inspections Training 	High	<ul style="list-style-type: none"> Use of platforms were practical 	Community Management	6 monthly
Electrical hazards	<ul style="list-style-type: none"> Use of electrical equipment 	<ul style="list-style-type: none"> Workers Contractors 	<ul style="list-style-type: none"> Electric shock 	<ul style="list-style-type: none"> Testing and tagging 	Medium	<ul style="list-style-type: none"> Licensed contractors for electrical work 	Community Management	Annually
Environmental conditions	<ul style="list-style-type: none"> Heat Sun exposure Wet weather 	<ul style="list-style-type: none"> Workers Contractors 	<ul style="list-style-type: none"> Heat stress Slips 	<ul style="list-style-type: none"> Sun protection Hydration PPE 	Medium	<ul style="list-style-type: none"> Weather monitoring procedures 	Community Management	Seasonally
Psychosocial hazards	<ul style="list-style-type: none"> Workload Resident interactions 	<ul style="list-style-type: none"> Workers 	<ul style="list-style-type: none"> Stress Fatigue 	<ul style="list-style-type: none"> Reasonable workloads EAP 	Medium	<ul style="list-style-type: none"> Regular check-ins 	Senior Management / Community Management	Annually
<p>Notes on use:</p> <ul style="list-style-type: none"> This document serves both as a register of known hazards and an assessment of typical risks and controls. Site specific risks are addressed separately in the Community Safety Plan where required. This register should be reviewed and updated regularly or following changes in operation, incidents or legislation. 								

