Policy and Procedure

Name:	Workplace Health Safety Framework
Approved by:	Executive Director of Legal and Compliance
Date Approved:	02/06/2017
Approved by:	Executive Dean
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Implementation Owner	Executive Dean
Maintenance Owner	Legal & Compliance Team
Review Date	02/06/2018

The Australasian College of Health & Wellness | **Phone:** 1300 227 603 | **Website:** www.tachw.edu.au

SECTION 1 – INTRODUCTION

PURPOSE

Provider Registration Standard 6.7 requires that MHM Higher Education Pty Ltd trading as The Australasian College of Health and Wellness (ACHW) promotes an inclusive and safe culture, ensures there are appropriate security arrangements for all its locations, and advises students of actions they can take to enhance their safety and security both on and off campus.

ACHW is committed to the health, safety and wellbeing of all people who work at, study at or visit the organisation through the provision of a safe and supportive environment for staff, students, visitors and contractors. This policy covers the health and safety system for those who work at or visit ACHW.

SCOPE

Delegations

Workplace Health & Safety Framework		
Delegations	**Authority**	**Record**
1. Review and propose amendments to policy and procedure	Legal and Compliance	Documentation submitted to Board of Directors
2. Approval of policy and procedure	Board of Directors	Minutes
3. Exercise duty of care	People and Culture	WHS system documents
4. Exercise due diligence	Officers	Minutes
5. Take reasonable care	Workers	File note, email, Hazard / Incident / Injury Report, minutes
6. Ensure effective WHS system	Legal and Compliance	Policy, procedures, minutes, budgets
7. Implement policy and monitor performance	Heads of Faculty, Student Engagement, Operations	Minutes, policy, procedure
8. Ensure WHS of workers, students and visitors	Heads of Student Engagement, Operations	Minutes, procedures, training records, Hazard / Incident / Injury Report
9. Ensure work is carried out according to policy and WHS risk management processes	Heads of Student Engagement, Operations	Training records, minutes, email, file note, Annual Performance Review, Annual Performance Plan, disciplinary records
10. Establish processes and procedures to meet WHS obligations	Heads of Student Engagement, Operations	Policy, procedures, training records, Hazard / Incident / Injury Report, Hazard / Risk / Corrective Action

Workplace Health & Safety Framework		
Delegations	**Authority**	**Record**
		Register, WHSC minutes, election records
11. Establish WHS procedures for students	Legal and Compliance	Policy and procedures manuals
12. Investigate complaints, inspect workplace	People and Culture	File note, email, provisional improvement notices, Hazard / Incident / Injury Report
13. Review WHS issues	WHS Committee & Heads of Student Engagement, Operations	Minutes, Hazard / Risk / Corrective Action Register
14. Consult with employees regarding WHS issues	Managers Supervisors Team Leaders	Email, file note, diary entry, minutes
15. Maintain risk management and incident reporting / investigation processes	Heads of Student Engagement, Operations	Hazard / Risk / Corrective Action Register Hazard / Incident / Injury Report WorkCover notifications
16. Investigate incidents	Supervisors Managers External investigator	Investigation Reports Hazard / Risk / Corrective Action Register Hazard / Incident / Injury Report
17. Undertake injury management and oversee return to work programs	People and Culture	File notes, medical reports, Workers Compensation reports, position descriptions

SECTION 2 – POLICY

PRINCIPLES

This document outlines ACHW's framework for workplace health and safety, as follows:

POLICY

ACHW is committed to the health, safety and wellbeing of all people who work at, study at or visit our organisation through the provision of a safe and supportive environment for our workers, students, visitors and contractors.

This policy covers health and safety arrangements for those who work at or visit ACHW. Health, safety and security arrangements for students is also addressed in the Student Handbook and managed by Student Support Services.

ACHW is committed to:

- The ongoing development and improvement of its workplace health and safety system with a focus on identification, control or elimination of workplace hazards and risks

- Observing, implementing and fulfilling the requirements of the *Workplace Health & Safety Act 2011* (NSW), relevant regulations and codes
- Ongoing and active dialogue and consultation around health and safety with all persons involved in ACHW activities
- Ensuring our workers and contractors receive the appropriate health and safety training to enable them to conduct their work safely
- Having our leaders lead by example and demonstrating a visible commitment to health and safety to motivate, educate and support our managers, staff and students
- The ongoing monitoring and review of our health and safety and the effectiveness of WHS actions
- Ensuring all levels of management and workers carry out their health and safety responsibilities.

SECTION 3 – PROCEDURE

RESPONSIBILITY

Workplace health and safety is the responsibility of all - everyone has a duty of care to ensure the safety of themselves and others. Specific responsibilities are:

▸ **The organisation** has the primary duty of care for all workplace health and safety within ACHW as is reasonably practicable

▸ **Officers** (as defined under Corporations Act 2001) of ACHW include board members, directors and managers whose decision-making has the capacity to affect a substantial part of the business or the financial standing of the organisation. Officers have a duty to exercise due diligence to ensure the organisation complies with its obligations. Officers are required to:

- Understand the nature of ACHW's operations and associated risks and hazards and verify that those risks and hazards are being appropriately controlled
- Allocate appropriate resources to enable the identification, elimination or control of those risks / hazards and to enable effective consultation, incident notification and other required processes

Maintain knowledge of WHS laws and compliance requirements

▸ **Workers** are employees (including supervisors), contractors and others who work within the organisation. They have a duty to take reasonable care and to:
  - Care for their own health and safety and that of others
  - Comply with any reasonable instruction
  - Cooperate with ACHW's WHS policy, procedure or instruction

SPECIFIC RESPONSIBILITIES

Some staff have specific responsibilities under this WHS policy, as follows:

▸ **Chief Executive Officer:**
- Ensures that ACHW has in place effective WHS policies, procedures and systems (including risk management systems) for the health, safety and well-being of workers, students and others affected by its operations
- Actively demonstrates leadership in ACHW's WHS policy and risk management

▸ **Senior Management:**
- Implement ACHW's WHS Policy and risk management system in their divisions
- Provide strategic WHS direction
- Monitor WHS performance
- Actively demonstrate leadership in ACHW's WHS policy and risk management

▸ **Student Engagement & Operations Manager**
- Ensure the health, safety and well-being of workers, students and visitors within their school
- Identify, assess and control any hazards and risks associated with the school's activities (training and non-training)
- Actively demonstrate leadership in ACHW's WHS policy and risk management

▸ **Heads of Faculty, Supervisors and Lecturers**:
- Ensure the work which they are responsible for is carried out according to ACHW's WHS policy and risk management processes
- Monitor the health, safety and well-being of workers, students and visitors
- Provide training and guidance on workplace health and safety
- Demonstrate leadership on WHS issues

▸ **People and Culture**
- Establish processes and procedures to meet the organisation's obligations under workplace health and safety legislation and regulations
- Maintain records
- Manage worker's compensation issues and return to work programs

▸ **Quality Assurance**:
- Establish processes and procedures to meet the organisation's obligations for the health and safety of students
- Maintain appropriate records

CONSULTATION

Consultation and ongoing dialogue with workers, students and others is an essential element of our workplace health and safety system. The primary purpose of consultation is to share relevant WHS information with stakeholders and to provide them with an opportunity to contribute to health and safety issues within ACHW. This in turn enhances ACHW's ability to identify and control hazards, improving WHS outcomes for all stakeholders.

Consultation takes place at three levels:

- **Health & Safety Representatives** (HSRs): where workers request it, HSRs are elected by their colleagues to represent them on WHS matters. An HSR may investigate WHS complaints, inspect the workplace after the provision of reasonable notice and issue provisional improvement notices.

- **WHS Committee:**   the WHS Committee comprises representatives from all areas of ACHW, HSRs (if in place) and staff from corporate functions such as Student Services, Human Resources and facilities management. The WHSC meets regularly to review WHS issues in the workplace, identify corrective action and to provide strategic input into the management of WHS at ACHW.

- **Work Units:** all managers, supervisors and team leaders are responsible for discussing WHS issues on a regular basis with workers (and others, where necessary) in their areas. All team meetings have WHS as a standing agenda item which covers risks currently being assessed, changes to the workplace which affect WHS and ad hoc WHS topics which need to be raised or resolved.

WHS RISK MANAGEMENT

ACHW has in place a system to eliminate reasonably foreseeable risks or, where this is not reasonably practicable, to control risks. Risk management is the process of finding and fixing WHS problems and the basic steps are:

1. Identifying hazards
2. Assessing the risk to WHS of those hazards
3. Eliminating or controlling those hazards
4. Monitoring and reviewing control measures to ensure ongoing safety.

Risk management records (including forms and registers) are maintained by the People and Culture.

HAZARD IDENTIFICATION

A hazard is 'anything (including work practices or procedures) that has the potential to harm the health or safety of a person'.   Hazards can be identified by a range of methods, including:

▸ Considering the steps involved in the task and what hazards there are at each of these steps

- ▸ Analysing incidents and workers compensation data
- ▸ Consulting with workers e.g., in team meeting
- ▸ Understanding any hazards associated with our industry (including our workshops)
- ▸ Inspecting the workplace.

Any hazards identified must be recorded on the *WHS Incident, Hazard & Injury Report* form.

Hazards are recorded on the *WHS Hazard and Risk Register*.

RISK ASSESSMENT

A risk assessment is conducted, in consultation with workers, for any hazard identified in the workplace to determine the probability of and consequences expected from an incident. When assessing a risk, all reasonably available health and safety information on the hazard will be examined. This includes, for example:

- Plant or equipment instruction manuals
- Material safety data sheets
- Records of previous incidents
- Regulatory information.

A risk assessment matrix is used to assess and document the risk associated with each identified hazard.   The process and documentation for risk assessments is coordinated by Human Resources.

ELIMINATION OR CONTROL OF HAZARDS

Once hazards have been identified and the associated risk assessed, action to eliminate or control these hazard is put in place.   The action taken will depend on the nature and risk of the hazard and can include, for example:

- Substituting a hazardous substance, machine, process or task with a safer alternative
- Isolating the hazard from people
- Minimising the risk by engineering means
- Minimising the risk by administrative means, for example, by adopting safe working practices or providing training, instruction or information and adequate supervision
- Providing personal protective equipment (PPE).

People and Culture works in conjunction with relevant stakeholders throughout ACHW to eliminate and control hazards, and oversight is provided by the WHSC.

MONITORING AND REVIEW OF CONTROL MEASURES

Control measures will continue to be monitored and reviewed to ensure:

- Control measures have been properly implemented

- Workers are complying with these control measures
- The control measures continue to adequately manage the risks
- The control measures have not introduced any other hazard into the workplace.

People and Culture and the WHSC coordinate the ongoing monitoring of control measures, in consultation with relevant areas of ACHW.

INCIDENT REPORTING AND INVESTIGATION

Incident reporting and investigation of WHS issues is a vital part of ACHW's WHS management and is necessary for better understanding and control of hazards and risks at ACHW.

REPORTING

All workers are required to complete a *WHS Hazard, Incident & Injury Report* for the following types of incidents:

- Any workplace accident
- Any workplace incident where a person's safety is put at risk
- The occurrence of an injury – physical or psychological
- Near misses (events which have the potential to cause any of the above outcomes)

The *WHS Hazard, Incident & Injury Report* is provided to immediate supervisors in the first instance. Where incidents are of a highly sensitive nature, workers are able to report confidentially to People and Culture.

People and Culture will notify WorkCover of any serious incidents (as defined by regulations) immediately.

INVESTIGATION

Immediate supervisors undertake an initial investigation of the incident and will resolve issues by:

- Completing a risk assessment and risk rating
- Escalating the incident immediately to People and Culture for High Risk incidents
- Developing a Corrective Action Plan using a combination of controls (elimination, substitution, engineering control, administrative control or PPE) and following up to ensure actions have been completed
- Taking immediate corrective action for minor incidents such as removing obstacles from walkways, or may refer the issue to facilities management

More serious incidents will be investigated by an appropriate manager or external investigator, and recommendations as to corrective action will be made.

RECORDS

The People and Culture department maintains a *Hazard, Risk and Corrective Action Register.* This register records all reported hazards and the associated corrective actions. Risk assessment of the hazard prior to and after controls is also recorded.

The *Hazard, Risk and Corrective Action Register* is tabled at each WHSC meeting to continuing monitoring and oversight.

INJURY MANAGEMENT

Workplace injury management is about returning workers to productive employment as quickly and as safely as possible following a work-related injury or illness. The underlying principle of workplace injury management is that rehabilitation in the workplace, rather than at home or in a medical institution, is both more effective and more productive. ACHW is committed to:

- Ensuring that injured workers return to work as soon as is practicable and that returning to work is a normal practice and expectation
- Providing suitable duties, where practicable, for injured workers
- Consulting with injured workers and relevant stakeholders to monitor the effectiveness of the program
- Maintaining confidentiality

WORKERS COMPENSATION

Workers are required to notify their manager as soon as is practicable after sustaining an injury and complete a *WHS Hazard, Incident & Injury Report*. Where appropriate, ACHW (People and Culture) will notify its workers compensation insurer within 48 hours.

RETURN TO WORK PROGRAMS

The return to work of injured employees is an integral part of the workers compensation system. The Return to Work Coordinator (RWC) (People and Culture) will work with all relevant parties, including external rehabilitation providers if necessary, to implement return to work (RTW) programs.   The RWC will monitor the progress of the injured worker to ensure the RTW program is suitable and effective.

Workers who fail to participate in a medically-endorsed RTW program will jeopardise access to workers' compensation benefits.

SPECIFIC POLICY STATEMENTS

Specific policy statements and procedures for workplace health and safety are managed and maintained by People and Culture.

SECTION 4 – REFERENCE AND SUPPORTING INFORMATION

DEFINITIONS

Word/Term	Definition
Hazard	A hazard is a source of potential harm or a situation with the potential to cause harm to people, property or the environment.
Risk	A risk is the chance of something happening that will have an impact on objectives. It is measured in terms of consequences and likelihood. In the WHS context, risk should be thought of as the WHS consequence of a given severity, and the likelihood of that particular consequence occurring.
Consequence	The specific effect of an event occurring.
Likelihood	The chance of the consequences of an event.
Risk Rating	The process that produces a risk level for the activity. This is a combination of the consequence of a risk and the likelihood those consequences will occur.
Workers	Carry out work for a person conducting a business or undertaking (PCBU) and include employees, contractors, agency staff, labour hire staff, apprentices, people on work experience, sub-contractors, trainees and outworkers.

SUPPORTING DOCUMENTATION

Document name	Document type	Location
Student Handbook	Handbook	website
WHS Hazard, Incident & Injury Report	Form	internal
WHA Hazard, Risk and Corrective Action Register	Register	internal
Equipment Staff Training Procedure	procedure	internal
Clinical Supervision Policy	Policy	internal

SECTION 5 – CHANGE HISTORY

CHANGE HISTORY

Version	Approval date	Approved by	Approved by	Change
V1.0	02/06/2017	Executive Director of Legal and Compliance	Executive Dean	Original