



Work Health and Safety Policy

1. Purpose and scope

The Anglican Schools Corporation (Corporation) Work Health and Safety Policy outlines the key elements of our approach to ensuring, so far as is reasonably practicable, that the health and safety of our workers and other persons is not put at risk from the work and activities that are undertaken by the Corporation and its schools (*note 1*).

This policy sets out the key requirements for Corporation schools and Group Office to effectively manage obligations for Work Health and Safety. By meeting these requirements, the Corporation will establish a culture where safety and wellbeing is valued and prioritised, take a systematic and disciplined approach to managing safety and wellbeing, and meet legal obligations regarding work health and safety.

1.1 Our commitment to Work Health and Safety (WHS)

The Corporation is committed to the safety, health and wellbeing of workers (including contractors and volunteers) who undertake work on behalf of the Corporation and other persons (including students and visitors) who attend the Corporation's workplaces.

The Corporation takes seriously its WHS responsibilities and as such, resources will be made available to facilitate compliance with the relevant WHS Acts and

Regulations to ensure the workplace is safe, and to minimise risk to health and wellbeing to as low as reasonably practicable.

1.2 Application and Scope of Policy

The Corporation is a 'Person Conducting a Business Undertaking' (PCBU) under the NSW Work Health and Safety Act 2011 (the Act), and each school and Group Office are part of the Corporation as a PCBU. This policy is Corporation-wide and applies to each Corporation school and Group Office.

The scope of the policy includes:

- the work environment, including plant and structures
- any activity conducted on Corporation premises
- any place where the Corporation's work is carried out, including offsite excursions, camps or other authorised activities (*note 2*)
- workers and other persons, including students, parents, members of the public and trespassers.

All employees, volunteers, contractors and sub-contractors undertaking work (workers), and students and visitors (other persons) – while in Corporation workplaces or participating in authorised Corporation activities – have a shared responsibility for contributing to the health, safety and wellbeing of all persons.

The promotion and maintenance of health, safety and wellbeing matters, and the dissemination of WHS related information is primarily the responsibility of management. Management at all levels, in consultation with workers, have responsibility for developing, implementing and continually reviewing the Corporation's WHS Safety Management System.

2. Policy

Corporation schools and Group Office are required to have in place a Work Health and Safety Management System (WHS Management System) to proactively understand and manage risks to health, safety and wellbeing to a level that is as

low as reasonably practicable and instil a culture where safety and health is prioritised. This includes ensuring, so far as reasonably practicable (*note 3*):

- the provision and maintenance of a work environment without risks to health and safety
- the provision and maintenance of safe plant and structures
- the provision and maintenance of safe systems of work
- the safe use, handling, and storage of plant, structures and substances
- the provision of adequate facilities for the welfare at work of workers, including ensuring access to those facilities
- the provision of any information, training, instruction or supervision that is necessary to protect all persons from risks to their health and safety arising from work carried out
- the health of workers and the conditions at the workplace are monitored for the purpose of preventing illness or injury of workers arising from the conduct of the business or undertaking.

Key requirements for each element of a WHS Management System are set out below.

2.1 Leadership and commitment

The Corporation, its schools and Group Office will:

- discuss and promote the importance of safety, health and wellbeing in the workplace.
- establish a WHS Management System that meets each of the requirements set out in this policy.
- ensure that WHS policies and the supporting WHS procedures and information are readily accessible to workers.

2.2 Training, education and supervision

The Corporation, its schools and Group Office will:

- ensure workers receive training on the WHS Management System (including related policies and procedures) and their role and responsibilities for WHS and other training relevant to carrying out their roles safely or meeting specific WHS requirements within their roles (for example, first-aid officers).
- ensure all persons (including students) are appropriately trained and supervised in the safe use of equipment that may present a risk to safety and health.

2.3 Consultation

The Corporation, its schools and Group Office will:

- consult regularly with workers on health and safety matters through regular communication channels (including encouraging all workers to report any safety concerns). *(note 4)*
- consult, cooperate and coordinate with other PCBUs in circumstances where there is joint responsibility for ensuring the health and safety of workers or students. *(note 5)*
- establish and participate in the Corporation's WHS Representative Committee, which brings together representatives from each school and Group Office to discuss WHS matters and provide recommendations to management on matters relating to health, safety and wellbeing to drive continuous improvement.

Each Corporation school and Group Office will:

- establish a WHS consultation group at each school and Group Office that meets at least once per school term to:
 - facilitate cooperation in instigating, developing and carrying out measures designed to ensure workers' health and safety at work *(note 6)*
 - assist in developing standards, rules and procedures relating to health and safety that are to be followed or complied with at the workplace *(note 6)*
 - monitor the WHS Management System, and promote a safe work culture

- monitor the adequacy of WHS-related training
 - consider the adequacy of facilities for the welfare of workers (*note 7*)
 - consult on proposed changes that may affect the health or safety of workers (*note 7*)
 - review measures taken to ensure the health, safety and welfare of persons at a place of work, including reviewing Hazard and Risk Registers (*note 7*)
 - review results of WHS audits and inspections and monitor resolution of issues identified
 - review incident, injury and near-miss data to understand learnings from incidents and determine whether improvements are required
 - provide recommendations to management on actions to improve safety and wellbeing.
- where possible, at least half of the members of the WHS consultation group should not be nominated by management. However, if there are insufficient participants, management will appoint additional persons to the consultation group.

2.4 Risk and hazard management

The Corporation, its schools and Group Office will:

- proactively identify and document risks to safety, health and wellbeing (including psychological health), applying the Corporation's Risk Management Framework. This includes developing risk controls and mitigations to reduce risks to health and safety to as low as reasonably practicable, including designing and implementing safe systems of work and providing adequate facilities (including Personal Protective Equipment) and complying with relevant licencing, permit or other regulatory authorisations relevant to the workplace or work being undertaken.
- maintain hazard registers containing details of specific hazards to health and safety and steps taken to eliminate hazards, or if that is not possible, details of

controls in place to minimise the risk of the hazard to as low as reasonably practicable.

- document and approve risk assessments prior to undertaking activities that are outside normal operations and/or conducted offsite (for example, a 'variation to routine' for a school excursion).
- proactively consider and address risks to health and safety (and eliminate or minimise such risks to as low as reasonably practicable):
 - in the design and function of facilities, plant and equipment (*note 8*)
 - when implementing changes to facilities, equipment, processes or practices
 - when procuring goods, materials and services.
- document and practice emergency and critical incident response plans, including (but not limited to) conducting:
 - evacuation exercises (at least one per location in a calendar year)
 - lock-down exercise (at least one per school location in a calendar year).

2.5 Incident and injury management

The Corporation, its schools and Group Office will:

- have available appropriate first-aid equipment and staff trained in the use of such equipment in case of injury or illness.
- record all safety incidents, injuries and near misses in the Complispace Assurance Incident Register (or equivalent) with appropriate review of incidents/near misses to determine whether there are key learnings that can be addressed to improve the management of safety, health and wellbeing.
- ensure that SafeWork NSW (ph. 131 050) are notified of any *Notifiable Incidents* arising out of the conduct of the business undertaking immediately after becoming aware of such incidents (*note 9*). A Notifiable Incident includes the death of a person, the serious injury or illness of a person or a dangerous incident (refer definitions for further information). The Corporation

Board may also need to be notified of such incidents in line with the Reporting Significant Matters to the Board policy.

- in respect of actually, and potentially, injured workers, promote a favourable attitude towards workers compensation claims and recovery at work.
- have 'Return to Work' procedures to help injured workers achieve the best health, work and recovery outcomes.

2.6 Monitoring, evaluation and assurance

The Corporation, its schools and Group Office will:

- ensure the WHS Management System includes periodic safety inspections conducted across key risk areas.
- develop and monitor measurable objectives and targets for the WHS Management System to ensure improvement.
- provide timely reports to school leadership teams, school councils (at each school council meeting) and the WHS Representative Committee regarding the operation of the WHS Management System and other relevant WHS matters (including significant risks, hazards and incidents).
- participate in an independent assessment of the effectiveness, in general, of the management of WHS matters which will take place on a three-yearly cycle for each school and Group Office.

3. Roles and responsibilities

3.1 Board members

Under the *Act* the members of the Board are considered 'officers' of the Corporation and have positive due diligence obligations (*note 10*). The responsibility of 'officers' is to:

- establish systems to keep up to date knowledge of workplace health and safety matters across the organisation

- gain an understanding of the nature of the operations, and the hazards, risks and incidents associated with those operations
- ensure that appropriate resources and processes are in place to eliminate or minimise risks to health and safety from work carried out
- ensure appropriate processes exist for receiving and acting upon information regarding hazards, risks and incidents; and to respond to this information in a timely way
- ensure that appropriate processes are in place for complying with WHS duties and obligations.

3.2 School councils

School councils are sub-committees of the Corporation Board and the members of school councils are also 'officers' of the Corporation, and, with regard to their school, have responsibility to (*note 10*):

- establish systems to keep up to date knowledge of workplace health and safety matters across their school, including compliance with this policy
- gain an understanding of the nature of the operations, and the hazards, risks and incidents associated with the operations of the school
- ensure that appropriate resources and processes are in place to eliminate or minimise risks to health and safety from work carried out
- ensure appropriate processes exist for receiving and acting upon information regarding hazards, risks and incidents; and to respond to this information in a timely way
- ensure that appropriate processes are in place for complying with WHS duties and obligations.

3.3 Principals and the Chief Executive Officer

In addition to their duties under the Act as an 'officer' of the Corporation, each principal (with regard to their school) and the CEO (with regard to Group Office), has a duty of care to ensure, so far as '*reasonably practicable*' that workers

(including volunteers, contractors, subcontractors and their employees), and other persons (for example, students and people visiting the workplace), are not exposed to health and safety risks arising from the activities or undertakings of the Corporation, its schools or Group Office.

This duty covers both workers engaged at the Corporation's schools or Group Office and workers whose activities in carrying out their work (contractors, volunteers) are influenced and directed by the Corporation's schools or Group Office.

Principals and the CEO have responsibility for ensuring that:

- the requirements set out in Section 2 of this Policy are met within their respective workplaces
- information is provided to their school councils or other relevant governance committees to support 'officers' in discharging their responsibilities.

3.4 Heads of departments and other supervisors

All 'heads of departments' and other supervisors are responsible for establishing a commitment to work health and safety principles and practices in their areas of control and for taking action to correct unsafe work practices. It is their responsibility to:

- identify, assess, control and monitor workplace hazards within their areas of control
- support employee consultation arrangements
- encourage staff to report hazards or other issues that are inconsistent with WHS standards
- ensure WHS information is readily available to staff
- assist in the rehabilitation of injured workers in accordance with Corporation's Return-to-Work Program.

3.5 Workers

The definition of worker under Section 19 (1) of the Act includes an employee of a contractor or subcontractor, an employee of a labour hire company, an outworker, an apprentice or trainee, and a student gaining work experience.

All workers must (*note 11*):

- take reasonable care to ensure that their acts or omissions do not adversely affect the health and safety of workers or other persons
- take reasonable care for their own health and safety
- use and maintain equipment properly
- ensure that their work area is free of hazards
- cooperate with the school or Group Office in anything that they are required to do in order to ensure a safe workplace including:
 - notifying their supervisor of actual and potential hazards
 - reporting any safety and health related incidents (including near misses) through the nominated reporting system
 - wearing or using prescribed safety equipment and Personal Protective Equipment
 - carrying out work in a safe manner
 - following health and safety instructions
 - taking notice of signs
 - adhering to speed limits
 - participating in safety training.

Workers must not:

- intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety and welfare
- behave in a way that results in risk to others

- intentionally hinder or obstruct the giving or receiving of any form of aid when a person is injured at work.

3.6 Volunteers, contractors and sub-contractors, visitors:

All volunteers, contractors and sub-contractors, and visitors on Corporation premises are required to comply with our WHS Management System and to observe directions on health and safety from staff. Failure to comply or observe a direction may be considered a breach of contract and sufficient grounds for termination of a contract. Visitors who fail to follow directions may be asked to leave the premises. *(Note 12)*

4. Definitions and Explanations

Term	Meaning / Explanation
(As low as) reasonably practicable	<p>The concept of 'reasonably practicable' is generally accepted to require a balancing of the risks to health and safety on one hand, and the practicability and cost of mitigating those hazards on the other.</p> <p>The Act requires a consideration of the following specific matters in determining reasonable practicability:</p> <ul style="list-style-type: none">a) likelihood of hazard or risk concerned occurring;b) degree of harm that might result from the hazard or risk;c) what the person concerned knows, or ought reasonably to have known, about a

	<p>hazard or a risk and ways of eliminating or minimising the hazard or risk;</p> <p>d) availability and suitability of ways to eliminate or minimise the hazard or risk; and</p> <p>e) the cost of eliminating or minimising the hazard or risk.</p> <p>This is not an exhaustive list.</p> <p>In determining what is reasonably practicable in a given situation, no one factor is determinative and the test involves a weighing up of each of the factors in the context of the circumstances of the particular situation.</p>
Dangerous Incident	<p>An incident in relation to a workplace that exposes a worker or any other person to a serious risk to a person's health or safety emanating from an immediate or imminent exposure to:</p> <p>(a) an uncontrolled escape, spillage or leakage of a substance, or</p> <p>(b) an uncontrolled implosion, explosion or fire, or</p> <p>(c) an uncontrolled escape of gas or steam, or</p> <p>(d) an uncontrolled escape of a pressurised substance, or</p> <p>(e) electric shock, or</p>

	<p>(f) the fall or release from a height of any plant, substance or thing, or</p> <p>(g) the collapse, overturning, failure or malfunction of, or damage to, any plant that is required to be authorised for use in accordance with the regulations, or</p> <p>(h) the collapse or partial collapse of a structure, or</p> <p>(i) the collapse or failure of an excavation or of any shoring supporting an excavation, or</p> <p>(j) the inrush of water, mud or gas in workings, in an underground excavation or tunnel, or</p> <p>(k) the interruption of the main system of ventilation in an underground excavation or tunnel, or</p> <p>(l) any other event prescribed by the regulations.</p>
Health	Physical and psychological health
Notifiable Incident	Includes the death of a person, the <i>Serious Injury or Illness</i> of a person or a <i>Dangerous Incident</i>
Other Persons	Includes students, parents, members of the public and trespassers.

Personal Protective Equipment (PPE)	Anything used or worn by a person to minimise risk to the person's health and safety, including air supplied respiratory equipment
Person Conducting a Business or Undertaking (PCBU)	<p>A 'person' can include a body corporate (company), unincorporated body or association or a partnership. An individual is also a 'person' but will only be a PCBU where that individual is conducting a business in their own right. For example, a sole trader or self-employed person.</p> <p>The PCBU holds the primary duty of care for 'workers'. The Corporation is a PCBU, as is each Corporation school and Group Office.</p>

<p>Serious Injury or Illness</p>	<p>An injury or illness requiring the person to have:</p> <ul style="list-style-type: none">(a) immediate treatment as an in-patient in a hospital, or(b) immediate treatment for—<ul style="list-style-type: none">(i) the amputation of any part of his or her body, or(ii) a serious head injury, or(iii) a serious eye injury, or(iv) a serious burn, or(v) the separation of his or her skin from an underlying tissue (such as degloving or scalping), or(vi) a spinal injury, or(vii) the loss of a bodily function, or(viii) serious lacerations, or(c) medical treatment within 48 hours of exposure to a substance.
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WHS Management System	<p>A systematic approach to proactively managing safety risks throughout an organisation. This WHS Policy is structured around the key elements of a safety management system, including:</p> <ol style="list-style-type: none">1. Leadership and Commitment – strong management engagement, policies and planning for safety, health and wellbeing (Section 2.1 of the Policy)2. Promotion – training, education and supervision to ensure safety management is understood and prioritised (Section 2.2 of the Policy)3. Consultation – bringing together key stakeholders to drive good safety outcomes (Section 2.3 of the Policy)4. Risk and Hazard management – understanding and managing risks to safety to as low as reasonably practicable (Section 2.4 of the Policy)5. Incident and injury management – appropriately responding to health and safety incidents and near misses, and learning from them to continuously improve the system (Section 2.5 of the Policy), and6. Monitoring, evaluation and assurance – proactively reviewing the system to continuously improve, including through independent assurance (Section 2.6 of the Policy).
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Worker	A person who carries out work in any capacity for a PCBU. This includes employees, labour hire employees working for the PCBU, contractors, sub-contractors, or their employees, apprentices or trainees, work experience students, and volunteers.
Workplace	A place where work is carried out for a business or undertaking and includes any place where a worker goes, or is likely to be, while at work.
Volunteer	A person who is acting on a voluntary basis (irrespective of whether the person receives out-of-pocket expenses)

5. Related legislation

- Work Health and Safety Act 2011 (NSW)
- Work Health and Safety Regulation 2017 (NSW)
- Workplace Injury Management and Workers Compensation Act 1998 (NSW)

6. Related Documents

- Risk Management Framework
- Reporting Significant Matters to the Board
- Work Health and Safety Program, including Injury Management and Return to Work Program

7. Policy Review and Administration

The Policy shall be reviewed every three years or in the event of any information arising that would demonstrate the need for a review or resulting from any legislative or organisational change that would warrant a review.

Version	Approved By	Approval Date	Effective Date	Next Review Date
2.0	ASC Board	24 August 2021	24 August 2021	August 2024
Resolution Number		21/148		
Responsible Officer		Chief Risk Officer		
First Published		25 September 2012		

Foot Notes

Ref	Note
1	Primary duty of care - Section 19 (1) Work Health and Safety Act 2011.
2	Section 8 of the Act defines a workplace as 'a place where work is carried out for a business or undertaking and includes any place where a worker goes, or is likely to be, while at work'.
3	Requirements align with Section 19(3) of the Act.

4	<p>Section 47 of the Act requires a PCBU to consult (as far as reasonably practicable) with workers who are likely to be affected by a matter relating to work health and safety.</p> <p>The Act allows procedures for consultation to be agreed, but the nature of consultation cannot be inconsistent with section 48, which requires sharing information on the matter with workers; giving workers a reasonable opportunity to express views and contribute to decision making on the matter; taking into account the views of workers; and advising workers of the outcome of consultation in a timely manner).</p>
5	<p>Section 46 of the Act requires a PCBU to consult with other duty holders (PCBUs).</p>
6	<p>Functions of a WHS Committee under section 77 of the Act.</p>
7	<p>Specific matters that must be consulted on under section 49 of the Act.</p>
8	<p>Sections 21 to 26 of the Act set out duties relevant to the design, construction and installation/commissioning of plant, facilities, and structures.</p>
9	<p>Section 38 of the Act requires a PCBU to notify the regulator (Safework NSW) immediately after becoming aware a notifiable incident has occurred.</p>
10	<p>Duties of an Officer are set out in Section 27 of the Act.</p>
11	<p>Duties of workers and set out in Section 28 of the Act.</p>

12	Duties of other persons are set out in Section 29 of the Act.
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