WORK HEALTH AND SAFETY POLICY

Overview of Policy

The Australian Institute of Management – Qld & NT (AIM) is committed to ensuring a safe and healthy working and learning environment for workers, students and visitors in accordance with its legislative obligations.

To achieve this, AIM is:

- Committed to implementing a range of strategies and programs to support the health, safety and wellbeing of all workers and visitors including training and instruction to workers commensurate with their roles and responsibilities.
- Committed to regular work health and safety consultations with workers and their representatives and, where necessary with contractors and suppliers of equipment and services, to ensure that work health and safety management is of the highest standard.
- Committed to an injury management system aimed at the early and safe return to work of injured workers, in accordance with its legislative obligations.
- Committed to ensuring there are systems and procedures in place to ensure the implementation of this policy.
- Committed to review this policy annually.

January 2012

1. Interpretation of Work Health and Safety Policy

Unless the context requires otherwise, the following terms when used in this document shall have the meaning ascribed to them below.

"Acts" means *Work Health and Safety Act 2011 Queensland* or *Work Health and Safety (National Uniform Legislation) NT Act 2011* as the context may require.

"**Reference document**" or "**Reference documents**" means a Reference document or Reference documents of this Policy.

"Board" means the Board of Directors of Australian Institute of Management – Qld & NT and its fully owned subsidiaries that do not have an independent board.

"**Employer**" means Australian Institute of Management – Qld & NT.

"Executive" means a person appointed as an Executive by the Employer.

"**Health and Safety Committee**" means the Health and Safety Committee(s) appointed in accordance with the provisions of section 5 of this Policy.

"**Health and Safety Representative**" means the Health and Safety Representative(s) appointed in accordance with the provisions of section 5 of this Policy.

"Manager" means a person appointed as a Manager by the Employer.

"Officer" means a Director, Executive or Company Secretary of the Employer or a person who can make or participate in making decisions that affect the whole or a substantial part of the business of the Employer.

"**Policy**" means the Australian Institute of Management – Qld & NT Work Health and Safety Policy and is dated January 2012.

"**Staff**" means all employees and workers of the Employer, whether working in the business premises or any other place of business of the Employer, whether on permanent or temporary/seasonal basis, whether contractors or volunteers.

"Team Leader" means a person appointed as a Team Leader by the Employer.

"**WH&S Key Contact Person**" means the Executive or Manager appointed by the Employer to report directly to the CEO on the effective operation of this Policy.

"**Work Health and Safety Objectives**" means the objectives of the Employer outlined in section 4 of this Policy.

"**Work Health and Safety Policy**" means the entire contents of this document.

2. Introduction to Work Health and Safety Policy

2.1 Purpose and scope

The Policy contains the overall objectives of the Employer and describes the Work Health and Safety Management system that the Employer operates to conform to applicable laws and statutory requirements.

The Policy includes all aspects of the Employer's business activities and operations.

The Employer, Officers, Executive Managers and Staff must comply at all times with the policies and procedures laid down in this Policy.

2.2 Use and inspection

The Policy may be used as a reference document for the purpose of assessing the effectiveness of the Work Health and Safety Management system.

A copy of the Policy shall, at all times, be available via the WH&S Key Contact Person or a Work Health and Safety Representative (HSR).

A copy of this Policy will also be posted on the Employer's intranet for access by Staff while on the Employer's premises.

3. Work Health and Safety Management Responsibilities

3.1 Employer Responsibilities

3.1.1 The Board

The Board has ultimate responsibility for ensuring that the Employer fulfils its legal responsibilities, that policy objectives are achieved and that effective systems are in place for effective operation of this Policy.

The Board must ensure that Employer's policies are reviewed regularly in order to achieve compliance with existing policies, current work health and safety legislation and any changes in the law.

3.1.2 The Chief Executive Officer (CEO)

The CEO shall be responsible for oversight of the implementation of this Policy.

The CEO shall appoint a competent person as the WH&S Key Contact Person who shall undertake the measures required to comply with the requirements and prohibitions imposed by or under the relevant statutory provisions.

Through the effective operation of this Policy the CEO shall:

- Ensure that all Officers, Executive Managers and Staff operate in a safe manner and are aware of this Policy
- Implement strategies to improve Work Health and Safety awareness throughout the organisation
- Take a leading role in the definition and communication of this Policy
- Ensure adequate resources exist to achieve the objectives of this Policy
- Ensure adequate resources exist to support Work Health and Safety management

- Allocate responsibilities in accordance with this Policy
- Liaise with customers on Work Health and Safety matters, where necessary

3.1.3 The WH&S Key Contact Person

Implementation of this Policy is the responsibility of the WH&S Key Contact Person.

The WH&S Key Contact Person shall be generally responsible for the following:

- Install the necessary processes, procedures and systems in order to achieve the aims of this Policy
- Ensure that all new Staff are made aware of this Policy as part of their induction programme
- Provision and dissemination of Work Health and Safety advice and information to all Officers, Executive Managers and Staff
- Initiate required Work Health and Safety training requirements
- Ensuring staff are appropriately trained and qualified to operate equipment and machinery
- Approval of all Work Health and Safety procedures
- Operate and maintain this Policy.
- Initiate corrective and preventative action in response to any Policy deficiencies
- Performing or causing all hazard and risk assessments to be adequately performed
- Ensuring required remedial activity from hazard and risk assessments is carried out promptly and effectively
- Conducting inspections of all work activities that use electricity and ensure that as far as is reasonably practicable any risk to those who may be affected is removed or reduced. If necessary, such inspections may be carried out by an external specialist electrical contractor
- Carrying out regular audits to monitor the effectiveness of the Work Health and Safety Management System
- Provision of Work Health and Safety advice and information to the CEO
- Maintain regular contact with any government organisations regarding Work Health and Safety matters
- Ensuring that all equipment purchased by the Employer conforms to statutory work health and safety requirements
- Ensuring all sub-contractors who are at work on or in any of the Employer's premises are made aware of all safety procedures and any hazards applicable to the areas in which they are to work
- Ensuring all fire fighting appliances, detection systems and alarms are regularly inspected and tested and a log retained of the same. If necessary, such inspections may be carried out by an external specialist fire fighting equipment contractor
- Ensuring the Fire Procedure is displayed and reviewed at frequent intervals with regular tests of the procedure
- Ensuring that no new chemicals/substances will be purchased or brought into the premises until their potential risks and hazards have been assessed

3.1.4 Officers and Executive Managers

Officers and Executive Managers are responsible for ensuring good Work Health and Safety practice occurs in their departments and that this Policy is complied with by all Staff within their areas of responsibility.

Executive Managers are responsible for the following:

- Ensuring that all Staff work in a safe manner
- Ensuring that all Staff comply with this Policy
- Informing the WH&S Key Contact Person of any training requirements in Work Health and Safety related areas

- Informing the WH&S Key Contact Person of any corrective and preventative action in response to any Work Health and Safety deficiencies
- Ensuring that Work Health and Safety records are completed as required under this Policy

3.2 Staff Responsibilities

All members of Staff will be given access to this Policy on commencement of employment with the Employer.

Staff must make themselves familiar with this Policy within a reasonable time period. This will usually be achieved through the induction process applicable to new Staff.

All Staff are responsible for complying with this Policy and exercising their own duty of care to themselves whilst on the Employer's business and/or premises.

Staff are expected at all times to:

- be aware of Work Health and Safety issues;
- promote good practice as set out in this Policy;
- look out for the health and safety of every other member of Staff; and
- be prepared to undertake any task relating to Work Health and Safety without regard to job description.

Staff are encouraged to communicate their own safety requirements to the Employer as well as any safety matter that may affect any other member of Staff.

Staff have a responsibility to be on the lookout for possible hazards. If any of the following conditions or other possible hazardous situations are noticed, Staff should report it to an Officer, Manager, Team Leader or the WH&S Key Contact Person immediately:

- Any overloaded shelving
- Any overloaded vehicles
- Any vehicles, machinery or plant not being used for its intended purpose
- Slippery/oily floors and pathways/surfaces
- Tripping hazards e.g. wires, cables, piping
- Dark stairs
- Loose handrails or guard rails
- Loose or broken glass panes and open/broken windows
- Dangerously piled supplies or equipment
- Blocked or partially blocked aisles and walkways
- Unlocked doors and gates
- Electrical equipment left operating
- Open covers on electrical panels
- Leaks of steam, water, oil
- Blocked fire extinguishers, hose sprinkler heads
- Blocked fire doors
- Any equipment considered to be running hot or overheating
- Roof leaks
- Safety devices not operating properly
- Machine, power transmission, or drive guards missing, damaged, loose, or improperly placed.
- Loose electric wires and/or computer cables

Any member of Staff with a health and safety concern should inform his/her Manager initially. If, after investigation, the problem is not corrected in a reasonable time, or the Manager decides that

no action is required and the member of Staff is not satisfied with the explanation, he/she may refer the matter to the WH&S Key Contact Person.

If any employee becomes aware of a significant deviation from the Work Health and Safety policy, procedures and standard specifications, he/she must report it immediately to the CEO.

The Employer reserves the right to take any appropriate action to prevent the reoccurrence of such deviation.

Any breach of this Policy may be treated as a disciplinary matter and dealt with accordingly.

No person shall be allowed to participate in any activities that would jeopardise the health and safety of the Staff.

3.3 Children on premises

The Employer is committed to the safety of all workers, students and visitors and to that end is committed to the safety of children.

Children of workers, students and visitors must be supervised at all times by the worker, student and visitor when on AIM premises. Children are not permitted in work areas because they are designed for use and movement by adults. Children must remain in reception areas or common areas. Unaccompanied children over the age of 16 who are on AIM premises for a one off specific purpose or approved purpose such as work experience must sign in at the reception and receive a safety and evacuation induction.

3.4 Management of Work Health and Safety Policy documents

This Policy includes the documentation required to support the Employer's Work Health and Safety Objectives.

Documented procedures and instructions will assist the effective planning, operation and control of the Work Health and Safety Objectives.

All Work Health and Safety records of the Employer will be retained for a minimum of five years or longer as required by regulations. The WH&S Key Contact Person shall be responsible for the overall control of documentation of this Policy. Such documentation includes this Policy and any other document made with respect to achieving the objectives of this Policy. The WH&S Key Contact Person shall be responsible for the issue and retrieval of all documentation.

The WH&S Key Contact Person is responsible for maintaining this Policy, and all hard copies of procedures, regulations, standards and codes of practice.

The Employer may at any time without notice to the Staff make amendments to the Policy when deemed appropriate.

3.5 Records storage and access

The Employer shall keep in safe custody and in proper order and form all of the records relevant to this Policy.

Work Health and Safety records include the outcome of internal audits, risk assessments, corrective and preventive action, together with any incidents or accidents.

All such records should be monitored for legibility and suitably stored to prevent loss, damage or deterioration.

The records may be accessed or modified by the WH&S Key Contact Person or the CEO.

4. Work Health and Safety Objectives

The Employer recognises the need to establish Work Health and Safety performance objectives to ensure it meets statutory and legislative obligations.

The Employer's primary duty of care is to ensure, as far as is reasonably practicable, that Staff and other persons (for example students, clients or visitors) are not exposed to health and safety risks arising from its business or undertakings. This duty covers both Staff engaged or caused to be engaged by the Employer and Staff whose activities in carrying out their role are influenced and directed by the Employer.

The Employer's Work Health and Safety Objectives include:

- Complying fully with all work health and safety legislation
- Zero occurrences of accidents and incidents
- Completing risk assessments for all activities
- Maintaining all records in accordance with legislation
- Explanation, consultation and discussion of the Employer's Work Health and Safety management activities with all Staff

The Employer will communicate and implement its Work Health and Safety Objectives through:

- The WH&S Key Contact Person
- Health and Safety Committees
- Health and Safety Representatives
- Staff inductions
- Staff awareness sessions
- Staff briefings and communications
- Employer intranet
- Management reporting
- Board reporting

The Employer will ensure as far as is reasonably practicable:

- 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 Staff in carrying out work for the business or undertaking, including ensuring access to those facilities
- The provision of information, training, instruction or supervision that is necessary to protect persons from risks to their health and safety arising from work carried out as part of the conduct of the business
- That the health of Staff and the conditions at the workplace are monitored for the purpose of preventing illness or injury of persons arising from the conduct of the business

The Board and the CEO will ensure that this Policy is appropriately defined and that all Officer and Executive Managers receive the training and resources they need to carry out their Work Health and Safety responsibilities competently.

The Employer will implement a risk management program through which it will take positive steps to identify workplace hazards, assess each hazard in terms of likelihood and potential consequences and take action to eliminate or reduce each hazard it has identified.

5. Health and Safety Representatives and Health and Safety Committees

5.1 Health and Safety Representatives (HSR)

The Act provides for representation of Staff by HSRs.

The Act allows for Staff to be grouped into work groups for the purpose of electing a member of that group to represent them.

The number of work groups and the Staff who are to form part of the work group can be determined by agreement between the Employer and Staff.

Staff may ask the Employer to organise elections for one or more HSRs.

HSRs represent work groups, therefore work groups will need to be determined before HSRs can be elected.

Within fourteen days of receiving a request from a member of Staff, the Employer will commence discussions with Staff about the number and composition of work groups to be formed. Staff may request that their representative, for example a union official, be involved in these discussions.

These discussions will take into account:

- the number of Staff;
- the number and grouping of Staff who carry out the same or similar types of work;
- the diversity of the Staff and their work.

Once the discussions are completed the Employer will advise Staff of the outcome and the work groups that have been decided and an election may then be carried out.

Any member of Staff who is a member of a work group is eligible to be elected as a HSR unless they have been disqualified from being a HSR.

A HSR will hold their office for three years unless during that period they:

- resign;
- cease to be a member of Staff in the work group they represent;
- are disqualified as a HSR; or
- are removed from the position by the majority decision of the work group.

There is no legal duty or obligation for a HSR to perform any of the functions or exercise any of the powers of a HSR under the Act.

The primary power and function of a HSR is to represent Staff in their work group in relation to health and safety matters at work. A HSR may also:

- monitor the compliance of the Employer
- investigate complaints from work group members about work health and safety matters
- inquire into anything arising from the conduct of the Employer that appears to be a risk to the health or safety of work group members
- inspect the workplace or any part of the workplace at which work group members work, after giving reasonable notice to the Employer. (A HSR can inspect the workplace without giving notice, in the event of an incident or a situation involving a serious risk to the health or safety of a person emanating from an immediate or imminent exposure to a hazard.)

Under the Act, the Employer has corresponding obligations to ensure that a HSR can exercise their powers and perform their functions.

5.2 Health and Safety Committee (HSC)

A HSR or five or more Staff may request the creation of a HSC. The Employer will establish the HSC within two months of the request.

The Employer has chosen to establish an HSC commencing March 2012.

The HSR is entitled to be a member of the HSC if they wish to be.

A HSC brings together Staff and the Employer to assist in the development and review of Work Health and Safety policies and procedures for the workplace.

The Employer may establish additional HSCs in respect of each location at which the Employer conducts its business and operations.

To ensure Staff representation, at least half of the members of a HSC will be Staff not nominated by the Employer. If there is a HSR at the workplace, he/she may choose to be a member.

The remaining membership will be agreed between the Employer and the Staff.

A HSC must meet at least once every three months and at any other reasonable time at the request of at least half of the HSC members. Other matters regarding the operation of the HSC are for the members to determine.

The functions of a HSC are:

- to facilitate cooperation between the Employer and Staff in instigating, developing and carrying out measures designed to ensure the workers' health and safety at work;
- to assist in developing standards, rules and procedures relating to health and safety that are to be followed or complied with at the workplace;
- any functions prescribed by regulations; and
- any other functions agreed between the Employer and the HSC.

HSC members are entitled to:

- spend reasonably necessary paid work time attending meetings and carrying out their functions as committee members; and
- have access to information that the Employer has in relation to hazards, risk assessments and the health and safety of Staff at the workplace.

The entitlement to access information in relation to health and safety of Staff does not extend to personal or medical information unless the member of Staff consents. However, consent is not required if the information does not identify the member of Staff or could not reasonably be expected to identify the member of Staff.

6. Risk Assessments

The WH&S Key Contact Person will ensure that Risk Assessments are performed in respect of all of the Employer's premises and activities in accordance with the relevant Work Health and Safety legislation using the Hazard Identification and Risk Assessment procedures in Reference document 1 (Hazard Identification and Risk Assessment).

Such assessments will be repeated whenever any of the following factors occur:

- Changes in legislation
- Changes in control measures

- Changes in work carried out
- Transfer to new technology
- Original Hazard Identification and Risk Assessment is no longer valid

Hazard Identification and Risk Assessments will be recorded and maintained as Work Health and Safety records by the WH&S Key Contact Person.

The results of all such Hazard Identification and Risk Assessments will be communicated to and be available for inspection by Staff.

All Hazard Identification and Risk Assessments will identify necessary protective and preventive measures.

7. Emergency Response and Incident Reporting Procedures

7.1 Emergency response

The WH&S Key Contact Person shall ensure that all Staff are made aware of the Employer's Emergency Response Procedures which define the actions to be taken in the event of an emergency situation arising and the responsibilities of those involved.

The emergency response procedure is located in

- Reference document 9 (When there is a death in the workplace);
- Reference document 10 (What to do in an Emergency in Queensland); and
- Reference document 11 (What to do in an Emergency in Northern Territory).

7.2 Incident reporting

All Work Health and Safety incidents, accidents, dangerous occurrences and near misses must be reported immediately (or as soon as practicably possible) after the event to the WH&S Key Contact Person.

The WH&S Key Contact Person will investigate all Work Health and Safety incidents, accidents, dangerous occurrences and near misses within twenty-four hours.

The WH&S Key Contact Person will immediately notify the CEO of all Work Health and Safety incidents, accidents, dangerous occurrences and near misses without exception.

The Incident Reporting procedures are located in

- Reference document 4 (Incident Reporting in Queensland);
- Reference document 5 (Incident Reporting in Northern Territory);
- Reference document 6 (Incident Investigation and Recording Queensland);
- Reference document 7 (Incident / Hazard Report Form); and
- Reference document 8 (Incident / Hazard Investigation Report.

7.3 Incident reporting to the Board

The CEO will report all notifiable incidents to the Chairman of the AIM Board immediately.

8. Safety Management Audit

The WH&S Key Contact Person will conduct a Safety Management Audit bi-annually. A Workplace Inspection Checklist will be completed as part of the audit. Such audit will also form part of the ISO Audit Program.
The outcome of the Safety Management Audit will be reported to the Board and the Audit and Risk Management Committee.

The Safety Management Audit topics are listed in the reference document 2. A workplace Inspection Checklist is attached as reference document 3.

The WH&S Key Contact Person will ensure that any remedial action is promptly carried out following each audit and will assess the effectiveness of such actions.

9. Governance Reporting

9.1 Executive Management Review

This Policy should be reviewed by the CEO and the WH&S Key Contact Person to ensure that it is adequate. These reviews will be scheduled as part of the annual Strategic Planning process.

The WH&S Key Contact Person is responsible for ensuring that an accurate record of the annual executive management review is maintained including all agreed actions and timetables.

The executive management review agenda should include the necessary items to ensure that the Employer's Work Health and Safety performance meets Board requirements and that the systems continue to be effective and suitable. The review should also make an assessment of any necessary changes and/or improvements required.

The team who will carry out the annual executive management review should comprise at least the CEO and the WH&S Key Contact Person.

The WH&S Key Contact Person should report on the performance of this Policy at the annual management review.

The annual management review should examine all Work Health and Safety non-compliances and problems, agreeing upon any appropriate remedial action. Should any features emerge which indicate persistent problems, then specific monitoring programmes should be undertaken and reviewed at appropriate intervals.

The annual management review agenda should include, but not be limited to the following items:

- approval of minutes of the previous annual executive management review meeting
- minutes of all Health and Safety Committee meetings held since the previous annual executive management review meeting
- any external audit reports
- the Policy's suitability for legislative and organisational needs
- Work Health and Safety performance and measures
- progress of any ongoing modifications to the Policy
- remedial actions, including assessment of their effectiveness
- recommendations for improvement

The WH&S Key Contact Person is responsible for ensuring that all agreed actions are implemented.

A formal report will be prepared for Board approval following the annual executive management review meeting.

9.2 Board and Audit and Risk Management Committee

The HSC will submit a report to the Board and will be included as an agenda item at each Board meeting.

The report will contain:

- Incident Statistics
- Hazard Identification and Risk Management
- Any updates to the current legislation

A quarterly report will be submitted at each Audit and Risk Management Committee meeting for the Committee's review. This quarterly report will contain:

- Incident Statistics
- Hazard Identification and Risk Management
- Any updates to the current legislation
- Any outcome of the discussion at the AIM Board meeting in relation to the report submitted by the HSC

Reference Documents

1. Hazard Identification and Risk Assessments (Form AIM-HR036)
2. Safety Management Audit Topics
3. Workplace Inspection Checklist (Form AIM-HR022)
4. Incident Investigation and Reporting (injury, illness or dangerous incidents) in Queensland (Form AIM-HR046)
5. Incident Investigation and Reporting (death, injury, illness or dangerous incidents) in Northern Territory (Form AIM-HR046)
6. Incident Investigation and Recording (non-notifiable incidents)
7. Incident / Hazard Report Form (Form AIM-HR031)
8. Incident / Hazard Investigation Report (Form AIM-HR031)
9. When there is a death in the workplace
10. What to do in an Emergency (Queensland)
11. What to do in an Emergency (Northern Territory)