**Independent MBA Business School** 



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# Document Title HEALTH, SAFETY AND WELLBEING POLICY

# **Document Status and Governance**

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Related Documents and References	External Documents  Commonwealth Legislation  Work Health and Safety Act 2011  Fair Work Act 2009  Fair Work Legislation Amendment (Secure Jobs, Better Pay) Act 2022  Privacy Act 1988  Tertiary Education Quality and Standards Agency Act 2011  Higher Education Standards Framework (Threshold Standards) 2021  Education Services for Overseas Students Act 2000  Disability Discrimination Act 1992  Age Discrimination Act 2004  Sex Discrimination Act 1984  Anti-Discrimination and Human Rights Legislation Amendment (Respect at Work) Act 2022 (Cth)  Australian Human Rights Commission Act 1986  Gene Technology Act 2000  Australian Radiation Protection and Nuclear Safety Act 1998  National Code of Practice for Providers of Education and Training to Overseas Students 2018  New South Wales	

- Work Health and Safety Regulation 2017 (NSW)
- Workers Compensation Act 1987 (NSW)
- Workplace Injury Management and Workers Compensation Act 1998 (NSW)
- Anti-Discrimination Act 1977 (NSW)
- Public Health Act 2010 (NSW)
- Health Records and Information Privacy Act 2002 (NSW)
- Dangerous Goods (Road and Rail Transport) Act 2008 (NSW)
- Radiation Control Act 1990 (NSW)
- Gene Technology (New South Wales) Act 2003
- Biosecurity Act 2015 (NSW)

#### **Victoria**

- Occupational Health and Safety Act 2004 (VIC)
- Occupational Health and Safety Regulations 2017 (VIC)
- Workplace Injury Rehabilitation and Compensation Act 2013 (VIC)
- Equal Opportunity Act 2010 (VIC)
- Public Health and Wellbeing Act 2008 (VIC)
- Dangerous Goods Act 1985 (VIC)
- Health Records Act 2001 (VIC)
- Radiation Act 2005 (VIC)
- Gene Technology Act 2001 (VIC)
- Biosecurity Act 2019 (VIC)

#### South Australia

- Work Health and Safety Act 2012 (SA)
- Work Health and Safety Regulations 2012 (SA)
- Return to Work Act 2014 (SA)
- Return to Work Regulations 2015 (SA)
- Equal Opportunity Act 1984 (SA)
- Public Health Act 2011 (SA)
- Dangerous Substances Act 1979 (SA)
- Controlled Substances Act 1984 (SA)
- Radiation Protection and Control Act 1982 (SA)
- Gene Technology Act 2001 (SA)
- South Australian Public Health Act 2011

### **Relevant Standards and Codes of Practice**

- ISO 45001:2018 Occupational Health and Safety Management Systems
- ISO 45003:2021 Occupational Health and Safety Management –
   Psychological Health and Safety at Work Guidelines for Managing
   Psychosocial Risks
- AS/NZS 2243 Series Safety in Laboratories
- AS/NZS 4801:2001 Occupational Health and Safety Management Systems
- AS 3745-2010 Planning for Emergencies in Facilities
- National Code of Practice for the Storage and Handling of Dangerous Goods
- Model Codes of Practice (Safe Work Australia)
- Safe Work Australia's Code of Practice on Managing Psychosocial Hazards
- Work Health and Safety (Managing Psychosocial Hazards at Work)
   Code of Practice 2024

- First Aid in the Workplace Code of Practice
- How to Manage Work Health and Safety Risks Code of Practice
- Managing the Work Environment and Facilities Code of Practice
- Work Health and Safety Consultation, Cooperation and Coordination Code of Practice

#### **Internal Documents**

Code of Conduct
Staff Grievance Policy
Equity, Diversity and Inclusion Policy
Student Support Framework
Student Welfare Policy
Critical Incident Management Policy

# 1 Purpose

- 1.1 Group Colleges Australia is committed to providing a safe, healthy and supportive environment for all staff, students, contractors, visitors and others who may be affected by our operations. This policy establishes the framework for effective management of work health, safety and wellbeing across all GCA activities and operations.
- 1.2 The policy aims to:
  - Promote a positive health, safety and wellbeing culture
  - Prevent workplace injury and illness
  - · Ensure compliance with relevant legislation
  - Support continuous improvement in safety performance
  - Foster consultation and engagement on safety matters
- 1.3 This policy ensures alignment with the Higher Education Standards Framework requirements for providing safe and secure learning environments and supporting student wellbeing.

# 2 Scope

- 2.1 This policy applies to:
  - All staff (continuing, fixed-term, casual)
  - Students (current and prospective)
  - Contractors, third party hire and consultants
  - Visitors and volunteers
  - All GCA premises and facilities
  - Approved remote working locations
  - All GCA activities and operations
  - · Online learning environments
  - Work-integrated learning placements
  - Off-site activities under GCA control

# 3 Policy Statement

# **Policy Principles**

The health, safety and wellbeing of our community is fundamental to GCA's success and sustainability. These principles establish a comprehensive framework for protecting and promoting the health, safety and wellbeing of all persons affected by GCA's operations. They reflect our understanding that effective health and safety management requires a systematic, risk-based approach integrated into all aspects of our operations.

The principles emphasise leadership commitment, staff, student and other stakeholder participation, and continuous improvement as essential elements of our safety culture. They also acknowledge that wellbeing encompasses physical, mental, and social dimensions, requiring a holistic approach to creating safe and supportive environments. Through these principles, GCA aims to not only meet its legislative obligations but to foster a proactive safety culture that goes beyond compliance to achieve excellence in health, safety and wellbeing outcomes.

## 3.1 GCA is committed to:

- a) Providing and maintaining:
  - Safe working and learning environments
  - Safe plant, equipment and structures
  - Safe systems of work
  - Adequate facilities for staff and student welfare
  - Culturally and psychologically safe work environment for staff and students
- b) Managing risks through:
  - Systematic hazard identification
  - Risk assessment and control
  - · Regular monitoring and review
  - Continuous improvement
- c) Supporting wellbeing through:
  - Mental health awareness and support
  - Work-life balance initiatives
  - Ergonomic work environments
  - Health promotion activities
- d) Fulfilling its positive and proactive duty under the Sex Discrimination Act 1984 by taking reasonable and proportionate measures to eliminate, as far as possible, unlawful discriminatory conduct, including:
  - sex discrimination;
  - sexual harassment;
  - sex-based harassment;
  - conduct that amounts to subjecting a person to a hostile environment on the ground of sex;
  - acts of victimisation;
  - acts of bullying.
- 3.2 Core GCA health, safety and wellbeing principles:
  - a) Leadership and Commitment:
    - Clear safety accountabilities at all levels
    - Visible management commitment

- Adequate resources allocation
- Integration with business operations
- b) Consultation, Communication and Education:
  - Regular safety consultation
  - Clear safety communication channels
  - Staff participation and feedback mechanisms
  - Student engagement in safety matters
  - Induction and training
- c) Risk Management:
  - Proactive hazard management
  - Evidence-based decision making
  - Prevention-focused approaches
  - · Regular risk reviews
- d) Continuous Improvement:
  - Regular system reviews
  - · Performance monitoring
  - Incident investigation and learning
  - Best practice adoption

## **Implementation Requirements**

Effective implementation of health, safety and wellbeing management requires a structured and systematic approach across all areas of GCA's operations. These requirements establish the practical frameworks, processes and systems necessary to translate our policy principles into action. They provide detailed guidance for staff and students on their responsibilities and outline clear procedures for decision-making and risk management.

The requirements ensure that health and safety considerations are integrated into planning and operational decisions at all levels of the organisation. They support GCA's commitment to continuous improvement by establishing mechanisms for monitoring, reviewing and enhancing safety performance. Through these requirements, GCA aims to create a robust foundation for maintaining safe environments and promoting wellbeing while ensuring compliance with legislative obligations and industry best practices

- 3.3 Safety Management System:
  - a) Documentation:
    - Policies and procedures
    - Safe work practices
    - Risk assessments
    - Safety records
    - Data and Privacy Compliance (Aligned with the Privacy Act 1988)
  - b) Training and Competency:
    - Safety induction programs
    - Role-specific training
    - Regular updates

- Competency assessment
- Refresher Programs
- Emergency Response Training

## 3.4 Risk Management:

- a) Risk Assessment:
  - Systematic hazard identification
  - Risk evaluation and prioritisation
  - Control measure implementation
  - Effectiveness monitoring
- b) Control Measures:
  - Elimination where possible
  - Engineering controls where applicable
  - Administrative controls
  - Personal protective equipment where and as applicable

# 3.5 Incident and Injury Management:

- a) Reporting Requirements:
  - Prompt incident reporting
  - · Prompt notification to relevant authorities
  - Investigation procedures
  - Corrective actions
  - Performance monitoring
  - Escalation pathways
- b) Emergency Response:
  - Emergency plans
  - First aid arrangements
  - Evacuation procedures
  - Regular drills
- c) Return to Work (RTW) Programs:
  - Individualised RTW plans
  - Collaboration with medical professionals and injured employees
  - Workplace adjustments and reasonable accommodations
- d) Workers' Compensation Compliance:
  - Adherence to legislative requirements in all jurisdictions
  - Support with claims management and reporting
  - Coordination with insurers and regulatory bodies

#### 3.6 Consultation:

- a) Consultation Mechanisms:
  - Health, Safety and Wellbeing Committee
  - Regular safety meetings
  - · Staff consultations

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Student feedback channels

#### b) Communication:

- Safety information distribution
- Regular safety updates
- · Clear reporting lines
- Feedback mechanisms

# **Roles and Responsibilities**

The successful implementation of this policy depends on clear understanding and effective execution of health, safety and wellbeing responsibilities throughout GCA. This section outlines the specific duties and accountabilities of different roles within the organisation, recognising that everyone has a part to play in maintaining safe and healthy environments. The responsibilities cascade from the Board of Directors' strategic oversight through to individual staff and students' daily activities. They reflect both legislative requirements and GCA's commitment to fostering a positive safety culture.

Clear delineation of responsibilities ensures coordinated action, prevents gaps in safety management, and supports effective decision-making at all levels. These roles and responsibilities have been developed to ensure systematic management of health, safety and wellbeing risks while promoting active participation and engagement from all members of the GCA community.

#### 3.7 Board of Directors:

- Ultimate responsibility for safety
- Policy approval
- Resource allocation
- Performance oversight

# 3.8 Chief Executive Officer and Executive Leaders:

- Safety leadership and culture
- System implementation
- Risk management system
- Resource management
- · Compliance monitoring

#### 3.9 Managers and Supervisors:

- Local safety management
- · Risk assessment oversight
- Staff supervision
- Incident management
- Injury management and return to work

# 3.10 People and Culture:

- Develop, implement and maintain GCA's workplace health, safety, and wellbeing management system.
- Advise on and ensure compliance with WHS legislation and psychological safety requirements.
- Provide training, resources, and support for WHS initiatives.
- Facilitate workplace well-being programs, including mental health support.

- Assist with incident investigations and return-to-work programs.
- Support consultation and communication on WHS matters.

#### 3.11 All Staff:

- Following safe work procedures
- Reporting hazards and incidents
- Contributing to safety improvements
- Supporting colleagues

#### 3.12 Students:

- Following safety instructions
- Reporting hazards
- Contributing to safe environment
- Supporting fellow students

#### 3.13 Contractors:

- Compliance with GCA requirements
- Safe work practices
- Risk management
- Incident reporting

# 4 Definitions

For the purpose of this policy, the following definitions apply:

**Consultation**: The process of sharing information about health and safety matters with workers and students, giving them a reasonable opportunity to express views, and taking those views into account before making decisions.

**Due Diligence**: The obligation of officers to take reasonable steps to acquire and update knowledge of safety matters, understand hazards and risks, ensure appropriate resources and processes to eliminate or minimise risks, and verify the use of these resources and processes.

**Duty of Care**: The legal obligation to take reasonable care to avoid causing harm to another person through either action or inaction.

**Emergency**: Any situation that poses an immediate threat to health, safety, property or the environment, requiring rapid and structured response.

Hazard: A source or situation with the potential to cause injury, illness, or damage, including:

- Physical hazards (noise, radiation, machinery)
- Chemical hazards (toxic substances, dust, fumes)
- Biological hazards (viruses, bacteria, fungi)
- Psychological hazards (stress, bullying, violence)
- Ergonomic hazards (manual handling, repetitive movements)

**Health**: A state of complete physical, mental and social wellbeing, not merely the absence of disease or infirmity.

**Health, Safety and Wellbeing Committee**: A formal consultative forum comprising management and worker representatives, established to:

- Facilitate cooperation between GCA and workers
- Assist in developing safety standards, rules and procedures

Perform other functions prescribed by regulation

**Incident**: Any unplanned event resulting in, or having the potential to result in, injury, ill health, damage, or loss, including:

- Near misses
- Work-related injuries
- Occupational diseases
- Property damage
- Environmental incidents

**Reasonably Practicable**: What could reasonably be done to ensure health and safety, considering:

- Likelihood of hazard or risk
- · Degree of potential harm
- Available knowledge about hazard/risk and control measures
- Availability and suitability of control measures
- Costs vs benefits of control measures

Risk: The likelihood and consequence of injury or harm occurring, assessed by considering:

- Probability of occurrence
- Severity of potential consequences
- Frequency and duration of exposure
- Individual vulnerability factors

**Risk Assessment**: The process of evaluating risks arising from hazards, considering existing controls and deciding whether risks are acceptable, including:

- Hazard identification
- · Risk analysis
- Risk evaluation
- Control measure determination
- · Implementation and review

**Risk Control**: Taking action to eliminate health and safety risks so far as is reasonably practicable, following the hierarchy of controls:

- Elimination
- Substitution
- Engineering controls
- Administrative controls
- Personal protective equipment

**Safe System of Work**: A formal procedure resulting from systematic examination of a task to identify hazards and specify safe methods, incorporating:

- Safe work procedures
- Training requirements
- Supervision arrangements
- · Emergency response
- Monitoring and review processes

**Safety Culture**: The product of individual and group values, attitudes, competencies and patterns of behaviour that determine commitment to health and safety management.

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Staff: All persons employed by GCA, including:

- · Continuing staff
- Fixed-term staff
- Casual staff
- Contract staff
- Agency staff

## Student: Any person who is:

- Currently enrolled in a course or unit
- Between enrolment periods
- On a leave of absence
- Recently completed but not yet graduated
   Seeking to enrol

Wellbeing: The state of being comfortable, healthy, or happy, encompassing:

- Physical health and fitness
- Mental health and resilience
- Social connections and support
- Work-life balance
- Job satisfaction
- Personal development

Worker: Any person who carries out work for GCA including:

- Employees (full-time, part-time, casual)
- Contractors and subcontractors
- Volunteers
- Work experience students
- Consultants
- Visitors performing work activities

Workplace: Any place where work is carried out for GCA and includes:

- Campus buildings and grounds
- Teaching and learning spaces
- Research facilities
- Administrative offices
- Common areas
- Remote work locations
- Online work environments

# 5 Document history

Version	Approver	Date	Amendments
V1	Board of Directors	10 February 2025	New policy