



SITS
COLLEGE

Workplace Health and Safety Policy and



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P018

Workplace Health and Safety Policy and Procedure

HCR Constructions Pty Ltd t/a SITS College

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Purpose

This policy and procedure set out SITS' expectations and requirements in the provision of a safe and health-promoting environment for all employees, students, volunteers and site visitors. SITS ensures that directors and employees of SITS adhere to relevant WHS legislation and understand their requirements to contribute to workplace health and safety in campus facilities and in the course of any external activities. Through the actions set out in this policy, SITS aims to safeguard its clients and staff from harm.

Definitions

Critical Incident	A traumatic or unexpected event, or the threat of such, which causes extreme stress, fear, or injury to individuals within the organisation.
Hazard	Anything that has the potential to cause harm, including injury, disease, death, or damage to property, equipment, or the environment. A hazard can be a thing or a situation.
Hazard Identification	The process of examining each work area and task to identify all hazards inherent in the job or environment.
Hierarchy of Control	A system for selecting the most effective control measures for managing hazards.
Incident	An incident is any unplanned event that results in or has the potential to result in harm, injury, illness, damage, or loss.
Notifiable Incident	Under the Work Health and Safety Act 2011 (Qld) this includes the death of a person, serious injury or illness, or a dangerous occurrence, all of which must be reported to Workplace Health and Safety Queensland within 48 hours.
Officers	Individuals with a duty under the Work Health and Safety Act 2011 to exercise due diligence to ensure the PCBU complies with its duties, including maintaining WHS knowledge, ensuring resources, and monitoring compliance.
PCBU (Person Conducting a Business or Undertaking)	The legal entity (in this case, the College) that holds the primary duty of care to ensure, so far as is reasonably practicable, the health and safety of workers and other persons.
Risk Assessment	The process of evaluating the risks associated with each identified hazard to understand the potential harm, its severity, and the likelihood of occurrence.
Worker	Any person carrying out work for the organisation, including employees, contractors, volunteers, or work experience participants. Workers must take reasonable care for their own health and safety and cooperate with WHS policies and procedures.

Policy

This policy and procedure are shared with staff and its implementation is thoroughly explained during staff induction and orientation sessions. A readily accessible copy of this policy is accessible to all staff via SITS online platform. SITS College maintains up-to-date registers dedicated to incidents, hazard identification and risk management. These documents are referenced within this policy for clarity and consistency.

In practice, SITS commitment to protecting workers and other persons from harm, so far as reasonably practicable, is supported by the following actions in line with the *Work Health and Safety Act (2011)* and the *Work Health and Safety Regulation (2011)*:

- **Hazard identification and risk management**
- **Management and reporting of incidents**
- **Provision of information, induction, training and supervision**
- **Provision of a process for consultation, cooperation and issue resolution**
- **Continuous improvement**
- **Compliance and monitoring**

Further details on measures are provided below.

Roles and Duties

The *Work Health and Safety Act (2011)* outlines the duties held by the Person Conducting the Business or Undertaking (PCBU), officers, workers, and other persons within the college community. SITS acknowledges the duties held by these roles cannot be transferred or delegated to another person.

More than one person can concurrently have the same duty and each duty holder must comply with that duty to the standard required by the legislation.

If more than one person has a duty for the same matter, each person is required to carry out their duty to the extent they have the capacity to influence and control the matter and must, so far as is reasonably practicable, consult, cooperate, and coordinate activities with all other persons who have a duty in relation to the same matter.

Duties of specific roles are outlined below:

Person conducting the business or undertaking (PCBU)

The PCBU has the primary duty of care under *Work Health and Safety Act (2011)* to ensure, as far as reasonably practicable, that the health and safety of workers and any other person is not put at risk from work carried out from conducting the business such as a college. In fulfilling this duty, SITS will:

- provide and maintain a safe work environment
- provide and maintain safe plant and structures
- provide and maintain safe systems of work
- ensure safe use, handling and storage of plant, structures and substances
- provide adequate facilities for workers welfare
- provide information, training, instruction or supervision

- monitor the health of workers and the conditions at the college to prevent illness or injury.

In addition to the primary duty of care, the PCBU has duties outlined in other sections of the *Work Health and Safety Act (2011)*. In fulfilling these duties, SITS will ensure, so far as is reasonably practicable:

- safe entry and exit to the college
- anything arising from the college is free from risk to the health and safety of any person
- fixtures, fittings and the plant are without risks to the health and safety of any person
- provision of consultation, cooperation, and issue resolution to workers
- reporting of notifiable incidents as soon as the college becomes aware of the incident
- compliance with codes of practices or adoption of an equivalent or higher standard.

Officers

Officers have a duty under the Act to exercise due diligence by ensuring the PCBU complies with the duties under the *Work Health and Safety Act (2011)*. Officers of SITS College will exercise due diligence by taking the following reasonable steps:

- acquiring and keeping up-to-date knowledge of work health and safety
- understanding the nature of the colleges' operations and the associated hazards and risks
- ensuring the college has resources and processes to eliminate or minimise risks to health and safety
- ensuring the college has processes for receiving, considering, and responding to information about incidents, hazards, and risks
- ensuring processes for complying with work health and safety legislation
- auditing and reviewing, work health and safety processes and use of the resources.

Workers

Workers have duties under the Act. Workers of SITS College have the following duties and will:

- take reasonable care for their own health and safety
- take reasonable care that their conduct does not adversely affect others
- comply, so far as the worker is reasonably able, with instruction given by the college
- co-operate with any reasonable, notified policy or procedure.

Other Persons

All other persons have duties under the Act. All other persons at SITS College have the following duties and will:

- take reasonable care for their own safety; and
- ensure their conduct does not adversely affect others; and
- comply, so far as the person is reasonably able, with reasonable instructions given by the college.

Hazard Identification and Risk Management

Workplace hazard identification, assessment and control is an ongoing process. These activities are undertaken at various times, including:

- if these activities have not been undertaken previously
- in the event that a hazard has been identified
- in the event of a change to the workplace may introduce or change a hazard, such as when changes occur to the work equipment, practices, procedures or environment.
- as part of responding to a workplace incident, even where an injury has not occurred.
- where new information about a risk becomes available or concerns about a risk are raised by workers.
- at regularly scheduled times appropriate to the workplace

Where a hazard has been identified, whether or not this is identified in conjunction with an incident that has occurred, the hazard is recorded on SITS Incident Report Register. This record includes an assessment of risk and a record of control measures/outcomes.

Risk Assessment Matrix

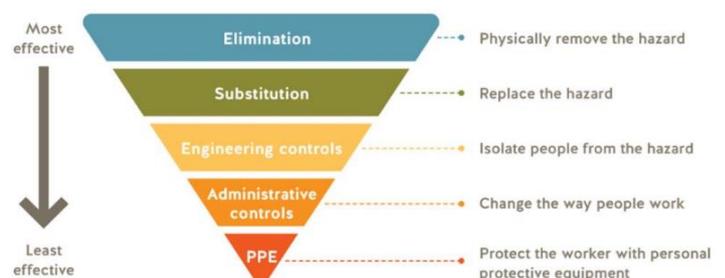
Workplace risks are assessed in line with The Risk Assessment Matrix. This matrix is used to assess the likelihood and the severity or consequences of a hazard and to give it a “risk rating”. For example, risks with a high likelihood and severe consequences would be considered high priority and require immediate attention and mitigation strategies.

	Impact				
	Negligible	Minor	Moderate	Significant	Severe
Likelihood					
Very Likely	Low Med	Medium	Med Hi	High	High
Likely	Low	Low Med	Medium	Med Hi	High
Possible	Low	Low Med	Medium	Med Hi	Med Hi
Unlikely	Low	Low Med	Low Med	Medium	Med Hi
Very Unlikely	Low	Low	Low Med	Medium	Medium

Hierarchy of Control Measures

The Hierarchy of Control Measures is a systematic approach to managing hazards by implementing control measures in order of effectiveness. It provides a framework for organizations to identify and implement the most effective control measures to minimize or eliminate risks.

The **Hierarchy of Control Measures** typically consists of the following control measures, listed in order of effectiveness:



Elimination: This involves completely removing the hazard or risk from the workplace. It is the most effective control measure because it eliminates the possibility of exposure to the hazard.

Substitution: This involves replacing the hazard with something less hazardous. For example, replacing normal scissors with safety scissors.

Engineering Controls: This involves modifying the work environment or equipment to reduce exposure to the hazard. For example, sectioning off an area where there is broken glass.

Administrative Controls: This involves implementing policies, procedures, or training programs to reduce exposure to the hazard. Examples include job rotation, training, or implementing signage and warning systems.

Personal Protective Equipment (PPE): This involves providing personal protective equipment, such as goggles or gloves to individuals to protect them from exposure to the hazard. PPE is considered the least effective control measure because it relies on human behaviour and may not always be used correctly or consistently.

Incident Reporting

SITS ensures that all staff are familiar with incident reporting processes and the use of SITS Incident Report Form. This process requires workers and other persons to report any hazards or incidents resulting in any potential or actual harm to health and safety (including psychological safety). Staff members are to contact the Campus Manager immediately if they believe an incident should be deemed a critical incident.

If staff/clients believe it is appropriate to contact emergency services (if a person is seriously injured or the situation requires immediate police intervention, or a fire exists or other) do so immediately and then inform the Campus Manager. The Campus Manager will then access, and initiate the procedure outlined in this policy. The procedure outlined in this policy includes actions required under the WHS Act, including the mandatory reporting of notifiable incidents to relevant state regulators within the required timeframe (as soon as possible and within 48 hours), preservation of incident sites, and recordkeeping for the minimum period on an approved incident reporting register.

All staff and clients (if applicable) involved in an incident may be required to complete SITS Incident Report form. These records are retained and added to SITS Incident Report Register in line with legislative requirements.

Information, Induction, Training and Supervision

SITS will ensure that appropriate information, induction, training, and supervision is provided to workers to enable them to perform their work without risk to their health or safety, as far as is reasonably practicable. The information, induction, training, and supervision will be suitable and adequate, having regard to:

- The nature of the work carried out by the worker; and
- The nature of the risks associated with the work at the time the information, induction, training, and supervision is provided; and
- The control measures that have been implemented.

SITS will ensure, so far as is reasonably practicable, that the information, induction, training, and supervision is provided in a way that is readily understandable by any person to whom it is provided. This includes considerations around the mode of any training provided to account for the diverse needs of SITS' Clients and Workers.

SITS' Staff Handbook and Student Handbook provide further guidance on the information, training, instruction, and supervision provided to workers and students at the college.

Consultation, Cooperation and Issue Resolution

SITS acknowledges its duty to consult, so far as is reasonably practicable, with workers who carry out work for the college and who are or are likely to be directly affected by work health and safety matters. Matters may include identifying, assessing, and eliminating or minimising hazards or risks relating to work carried out by the workers at the college, proposed changes to procedures for resolving worker issues or monitoring worker safety and the provision of information and training.

Consultation with workers includes sharing information regarding work, health and safety matters with workers and giving them reasonable opportunity to:

- express their views and raise work health and safety issues in relation to the matter; and
- contribute to the decision-making process relating to the matter; and
- access information on the outcome of the consultation in a timely manner.

All consultation and issue resolutions inform SITS ongoing continuous improvement processes and relevant items are added to SITS Continuous Improvement Register according to SITS Continuous Improvement Policy and Process.

Hazard Identification Procedure

The following procedure has been developed to ensure that SITS meets the intent of this policy, the required outcomes and its compliance obligations. The steps themselves, relevant staff members, and supporting documentation/records have been included for clarity and specificity.

Staff are expected to adhere to these actions as directed by the Compliance Head and Managing director.

Step	Action	Responsible Person
1	When staff (workers) identify a hazard, they promptly take action to minimise associated risks in line with their Duty of Care obligations and according to the risk rating and using the hierarchy of control measures. For instance, they may section off a hazardous area, assign someone to monitor the hazard, or set up signage. Staff report the identified hazard to their campus manager immediately.	Staff (workers)
2	On receiving the hazard report, the campus manager assesses the situation to determine the level of immediate risk. If the hazard poses limited immediate risk, the campus manager sources the most current version of the Hazard Report Form and fills it out accurately and comprehensively	Campus Manager (officer)
3	The campus manager reports the identified hazard to and liaises with the Head of Compliance or Director (PCBU) to ensure compliance with necessary processes for hazard removal or management. The Head of Compliance, WHS Officer, or Compliance Officer oversees the process and ensures adherence to relevant legislation and company policies.	Head of Compliance (PCBU) WHS Officer Compliance Officer
4	The Head of Compliance, WHS Officer, or Compliance Officer is responsible for collating and storing all documentation related to the hazard identification and response process. This includes updating the Hazard Report Register with details such as the nature of the hazard, actions taken, responsible parties, and dates of resolution.	Head of Compliance (PCBU) WHS Officer Compliance Officer
5	After the hazard has been addressed, the Head of Compliance or designated personnel conduct follow-up inspections to ensure that control measures are effective and that the hazard no longer poses a risk to health and safety.	Head of Compliance (PCBU) WHS Officer Compliance Officer

Step	Action	Responsible Person
	Any necessary adjustments to control measures or further actions are implemented based on the findings of these inspections.	
6	<p>Staff are provided with appropriate training on hazard identification, reporting procedures and control measures to foster a proactive safety culture within the organisation.</p> <p>Regular reviews of hazard identification and response procedures are conducted to identify areas for improvement and ensure ongoing compliance with legal requirements and industry best practices.</p>	<p>Head of Compliance (PCBU)</p> <p>Staff (workers)</p>

Incident Report Procedure

The following procedure has been developed to ensure that SITS meets the intent of this policy, the required outcomes and its compliance obligations. The steps themselves, relevant staff members, and supporting documentation/records have been included for clarity and specificity.

Staff are expected to adhere to these actions as directed by the Compliance Head and Managing director.

Step	Action	Responsible Person
1	<p>Staff members and/or clients identify and report incidents.</p> <p>a) In the identification of an incident, ensure that obligations under duty of care are met in the management of active risks (sectioning off hazards and making the area safe).</p> <p>Contact the Campus Manager immediately or managers specifically responsible for the area in which the incident has occurred.</p> <p>In emergencies, contact emergency services first and then inform the Campus Manager/ Director as soon as possible.</p>	Staff (workers)
2	<p>The Campus Manager accesses and initiates the incident reporting procedure.</p> <p>If the incident in question cannot be classified as a critical incident or a notifiable incident, the Campus Manager would delegate to the WHS Officer or Compliance Officer to lead the incident management process, which includes;</p> <p>a) providing each witness to the incident with a standard incident report form to complete within 24 hours</p> <p>b) following up with each witness to collect incident report forms as soon as possible</p> <p>c) analysing incident report forms for factors that might have contributed to or mitigated the incident/the severity of the incident</p> <p>d) storing incident report forms and adding details of the incident to the incident register</p> <p>e) making recommendations to improve policies, procedures and processes where necessary</p> <p>If the incident is classified as a critical or notifiable incident, the Campus Manager leads the incident management process in</p>	<p>Campus Manager (officer)</p> <p>Head of Compliance (PCBU)</p>



Step	Action	Responsible Person
	<p>conjunction with the Head of Compliance. Depending on the nature of the incident, this may include;</p> <ul style="list-style-type: none"> a) (Notifiable incident) ensuring that the state WHS regulator is notified (by the fastest possible means) immediately after becoming aware that a notifiable incident has arisen and within 48 hours b) (Notifiable incident) ensuring that the site where the incident occurred is not disturbed until after an inspector arrives at the site c) gathering facts regarding the incident by way of disseminating, collating and analysing incident report forms. Each witness to the incident should be provided with a standard incident report form to complete within 24 hours d) formulating an incident management plan e) contacting and liaising with emergency services as required f) contacting and liaising with emergency contacts as required g) liaising with staff as required h) preparing formal communications i) storing incident report forms and adding details of the incident to the incident report register j) making recommendations to improve policies, procedures and processes where necessary <p>The Department of Home Affairs and The Department of Education are informed if the incident involves the death of an international student or if the incident affects a student's attendance/course progress. PRISMS is employed for this purpose.</p>	
3	<p>All staff and clients involved in a critical/notifiable incident are offered counselling at the time of the incident, on completion of the incident management process and one month after the incident.</p> <p>All staff and clients involved in the incident are encouraged to contact the Campus Manager to access counselling services at any time during or after the incident.</p>	Head of Compliance (PCBU) Campus Manager (officer)
4	<p>Where any incident has occurred, final outcomes and actions must be documented and added to organisational/ incident registers. This is especially relevant for critical and notifiable incidents.</p>	Head of Compliance (PCBU)
5	<p>The management of the incident is reviewed on completion of the process and improvement action implemented where appropriate. The review includes:</p> <ul style="list-style-type: none"> a) Corrective actions – including target date and completion date for the implementation of corrective actions b) The effectiveness of strategies formulated and implemented c) Response times d) Levels of support provided to all parties e) Formal communications disseminated f) Handling of enquiries g) Liaising with external agencies h) Performance of external organisations i) Appropriateness of policies, procedures and documentation 	Head of Compliance (PCBU) WHS Officer Compliance Officer



Step	Action	Responsible Person
	Staff training is initiated as a result of improvement actions, and all improvement actions are recorded in accordance with SITS continuous improvement policy and procedure.	