

# WORK HEALTH & SAFETY POLICY

Policy Category	Operational Policy		
Document Owner	Head of People, Engagement and Culture		
Implementation Officer	Head of People, Engagement and Culture		
Review Date	Biennial		
Relevant to	ECA employees, consultants, contractors, visitors and business partners		
Related Documents	N/A		
<b>Version</b>	<b>Change description</b>	<b>Approved by</b>	<b>Effective date</b>
1.0	New Policy		20 September 2018
2.0	Reviewed and updated	ECA Executive Management Committee (EMC) 28 April 2021	7 May 2021
3.0	Reviewed and updated	ECA Executive Management Committee (EMC) 22 November 2023	13 December 2023

## 1. Overview

Education Centre of Australia Pty Ltd 'ECA' is committed to providing a safe and healthy working environment for all employees and visitors, so far as reasonably practicable. This will be achieved by management and employees working together, following health and safety policies, processes, and procedures monitored, reviewed, and audited to achieve best practice.

In so far as this policy imposes any obligations on ECA (i.e. those additional to those set out under legislation), those obligations are not contractual and do not give rise to any contractual rights. To the extent that this policy describes benefits and entitlements for employees (i.e. those additional to those set out under legislation), they are discretionary in nature and are also not intended to be contractual. The terms and conditions of employment that are intended to be contractual are set in an employee's written employment contract.

## 2. Purpose

ECA undertakes to regularly review this Policy to consider changes in legislation, activities, services, and products. A review may result in changes being made to this Policy from time to time, which all ECA employees, consultants, contractors, visitors and business partners must comply with at all times.

## 3. Scope

This Policy applies to:

- a) all ECA employees (whether full-time, part-time, or casual) and all persons performing work at the direction of, or on behalf of ECA, for example, contractors, subcontractors, agents, consultants, temporary staff, volunteers, and 'workers' as otherwise defined under relevant occupational/work health and safety (OHS/WHS) legislation); and
- b) all workers and visitors must comply with this Policy and any other reasonable instruction, Policy, or procedure communicated from time to time by ECA. Failure to follow safe work systems, misuse of health and safety equipment, bypass risk control mechanisms, or

interfere with another person's efforts to work safely may infringe the WHS legislation. Non-compliance will be managed according to ECA's Code of Conduct.

#### 4. Definitions

Definitions	
<b>WHS</b>	means work health and safety in the work environment.
<b>WHS legislation</b>	means the Work Health and Safety Act 2011 (NSW), the Occupational Health and Safety Act 2004 (VIC), and the Work Health and Safety Act 2011 (QLD).
<b>WHS Management System</b>	ECA's Work Health and Safety Management system including policies, processes, guidelines, and procedures.
<b>WHS regulations</b>	means the Work Health and Safety Regulations 2011 (NSW), Occupational Health and Safety Regulations 2017, and Work Health and Safety Regulation 2011 (QLD).

#### 5. Policy Principles

Under the WHS legislation and WHS regulations, ECA has obligations to ensure, as far as is reasonably practicable, the following:

- (a) to ensure that the workplace under its control is as far as reasonably possible safe and without undue risks to any person's health;
- (b) to provide and maintain safe plant and structures;
- (c) to provide and maintain safe systems of work;
- (d) to implement and communicate processes for the safe use, handling, and storage of plant, structures, and substances;
- (e) to provide adequate facilities for the welfare at work of employees in carrying out ECA's business and ensuring access to all appropriate ECA facilities;
- (f) to ensure that relevant health and safety laws that apply to working conditions and the work environment are observed and enforced;
- (g) to provide information, training, instruction, and/or supervision as is necessary to protect all persons from risks to their health and safety arising from work carried out at ECA;
- (h) to monitor workers' health and workplace conditions to prevent illness or injury of workers arising from the conduct of ECA (to the extent permitted by privacy law);
- (i) to consult with workers and other parties to address safety issues and improve decision making on workplace health and safety matters;
- (j) to ensure in so far as reasonably possible that the behaviour of all persons in the workplace does not cause undue risk to the health and safety of themselves and of others;
- (k) to support and assist workers in effective injury management and rehabilitation.

ECA will also seek to improve its WHS systems, materials, and performance continually.

## 6. Implementation

Strategies implemented to support this Policy are:

- a) The ECA Audit and Risk Committee regularly monitor and reviews the WHS Compliance.
- b) ECA's Executive Management (EMC) will oversee WHS implementation through monthly reporting via the HR Manager.
- c) The establishment and maintenance of ECA Group Emergency Management and Recovery Plan.
- d) The establishment of a Health and Safety Committee as required by the WHS legislation.
- e) Procedures in place for the identification and control of hazards.
- f) Procedures in place for the investigation and reporting of all accidents and dangerous incidents.
- g) Consultation with ECA employees on health and safety matters as required by the WHS legislation.
- h) The provision of first aid and emergency procedures.
- i) The provision of WHS information and training for ECA employees.
- j) Ongoing reviews and continual improvement of the ECA WHS Management System.
- k) Communication: This Policy will be available via the ECA Document Centre, Corporate Policies and via the HRM System.

## 7. Responsibilities

- (a) ECA Board members and ECA Directors have ultimate responsibility for the management of health and safety at ECA. Under work health and safety laws, ECA must ensure its Directors take all reasonable and practical steps to fulfill health and safety obligations; otherwise, ECA may be liable if an incident occurs in the workplace.
  
- (b) The ECA COO is responsible for providing leadership to ensure the effective implementation of and adherence to this Policy.
  
- (c) ECA Business Heads and managers are responsible for implementing this Policy in their business or operational area.  
All managers are responsible for:
  - the maintenance of the workplace in a safe and secure condition;
  - active involvement in the development, promotion, and implementation of health and safety policies and procedures;
  - training employees in the safe performance of their assigned tasks; and
  - providing appropriate resources to meet ECA's health and safety commitments.
  
- (d) All ECA employees, consultants, contractors, visitors and business partners are responsible for complying with the following when attending ECA's premises:
  - taking reasonable care for their own safety and the safety of others;
  - complying with any reasonable instruction, policy, or procedure concerning health and safety;
  - ensure they are not under the influence of alcohol, drugs or medication of any kind where doing so could adversely affect their ability to perform their duties safely or efficiently;
  - ensure they only perform work when they are fit to do so (including not being ill, injured or fatigued);
  - use and maintain any required Personal Protective Equipment;
  - immediately report any accident or "near miss" to ECA;
  - immediately report any unsafe work condition or equipment to ECA;
  - report any injuries sustained whilst working for ECA and seek appropriate first aid;

- advise ECA, as soon as practicable, of any symptoms that may lead to adverse health issues arising from prolonged and/or repetitive work activities;
- not misuse, damage, refuse to use, or interfere with any equipment or other materials provided in the interest of workplace health and safety;
- encourage fellow staff members, students and visitors to create and maintain a safe and healthy work environment;
- co-operate with any health and safety initiative, inspection or investigation introduced.

ECA recognise that employee consultation and participation in ECA's safety system is vital and improves decision-making about health and safety matters in the workplace. Consultation is also included in the process of risk assessments and the development of ECA's safe work practices.

Members of staff will be actively involved in the workplace safety system. Suggestions for change and improvements to policies, procedures or safe work practices are encouraged, through reporting to management. Meetings to consult and inform staff on safety issues shall be conducted through staff meetings, as regularly as is necessary.

Members of staff will be made aware of safety issues relating to their jobs on a regular basis. The manner of doing so will vary depending upon the type of information to be conveyed.

ECA expects all members of staff to be committed to working with management in order to effectively manage health and safety on the job. Staff are encouraged to contribute to decisions that may affect their health and safety in the workplace, through contact with management and/or at staff meetings.

## **8. Workplace Injuries - Rehabilitation and Return to Work**

ECA is proactive in its approach to injury management and places strong emphasis on the safe, timely and sustainable return to work program for injured or ill workers.

ECA is committed to:

- prompt injury notification;
- communication and consultation with all parties to develop an appropriate return to work program;
- accountability and responsibility for injury management being clearly understood;
- provision of suitable meaningful activities during the return-to-work process; and
- dispute resolution as required.

ECA will ensure the following positive approach in meeting these objectives, including:

- early reporting of injuries;
- appropriate and timely medical intervention and return to work planning;
- provision of suitable resources and productive duties for the injured worker;
- positive support and encouragement during the rehabilitation process; and
- review of incidents and accidents to seek preventive measures and continuous improvement.

## **9. Variations**

ECA may unilaterally introduce, vary, remove or replace this policy at any time.