

## 1 PURPOSE

- 1.1 The purpose of this policy is to provide guidance for the health, safety and wellbeing of all people who interact with the Organisation. This policy applies to staff, contractors, other workers, volunteers and visitors.
- 1.2 The Organisation is committed to:
- Empowering everyone to 'Think Safe Act Safe Be Safe' at all times thus contributing to a proactive and preventative safety culture
  - Fulfilling legal requirements and other requirements applicable to the business and related to WHS; as set out in the various Acts, Regulations and Codes of Practice across Australia and New Zealand. This includes obligations placed on the Organisation, officers and workers, and certain consultation requirements
  - Providing a safe and healthy workplace and system of work for the prevention of work-related injury and ill health
  - Assessing WHS risks and opportunities in the WHS Management System (WHSMS) and individual processes to effectively eliminate/minimise hazards and reduce WHS related risk
  - Continual improvement of the processes affecting WHS and the WHSMS
  - Ensuring conformance to the ISO 45001 : 2018 Occupational Health and Safety Management Systems Standard.

## 2 SCOPE

- 2.1 Within the Organisation everyone has a responsibility for health and safety. For ease, people are grouped into workers, officers and all other people.
- Staff and other workers include any person carrying out work for the Organisation as an employee, contractor, agent, secondee and/or volunteer;
  - Officers include any person who makes, or participates in making decisions that affect the whole, or a substantial part of the Organisation, and
  - All other people, such as visitors, who attend or otherwise are engaged with the Organisation's workplaces and/or staff and other workers.

Not complying with this policy may be considered misconduct and may result in a breach of the Organisation's Code of Conduct and/or disciplinary action being taken.

## 3 GLOSSARY

- 3.1 Terms not defined in this document may be in the Organisation's glossary. Also refer to WHS 1.00 WHS Manual References and Definitions.

### Terms and definitions

**Organisation:** Belgravia Group and associated entities.

**PCBU:** A Person Conducting a Business or Undertaking (PCBU) is the legal entity operating a business or undertaking. A PCBU may be an individual person or an organisation conducting a business or undertaking.

**Officer:** A senior executive who makes, or participates in making decisions that affect the whole, or substantial part of the business or undertaking.

**Speak Up hotline:** the Organisation engages Grapevine, an independent third-party service for staff to report concerns and whistleblowing.

**Supervisor/Manager (in a WHS sense):** A person who may be seen (whether as an owner or otherwise) to have, to any extent, the management or control of a workplace, who must ensure so far as is reasonably practicable that the workplace and the means of entering and leaving it are safe and without risks to health.

**Worker:** Anyone who carries out work for a PCBU, such as: an employee, a contractor or sub-contractor, an employee of a contractor or sub-contractor, an employee of a labour hire company, an apprentice or trainee, a student gaining work experience, an outworker or a volunteer.

**WHS:** Workplace Health and Safety

## 4 POLICY STATEMENT

- 4.1 The Organisation recognises its moral and legal responsibility to provide a safe and healthy workplace and system of work for employees, contractors and visitors. This commitment extends to ensuring our business operations do not place the community or environment at risk of harm.
- 4.2 The Organisation strives to maintain an effective approach to WHS by:
- Complying with WHS obligations, as set out in relevant legislative and other requirements;
  - Maintaining a proactive health and safety culture whereby health, safety and wellbeing is prioritised;
  - Conformance of the WHSMS to the ISO 45001:2018 Occupational Health and Safety Management Systems Standard criteria;
  - Providing and maintaining a safe work environment and system of work for all people;
  - Providing a suitable level of health and safety resource to effectively manage risk;
  - Proactively preventing injury and illness through workplace monitoring and intervention;
  - Providing adequate facilities that promote the wellbeing of our workers.
  - Maintaining a risk and hazard management program consistent with the nature of our workplace activities and scale of WHS risks;
  - Providing and reviewing written procedures and instructions to ensure implementation of safe systems of work;
  - Providing information, instruction, training and supervision for all workers and visitors;
  - Providing mechanisms to ensure no detriment to employees' psychological/physical health at work, and to promote the wellbeing;
  - Promoting and measuring effectiveness of WHS incident reporting, investigation and implementation of corrective actions;
  - Ensuring effective WHS related communication and consultation processes are available to all workers and their representatives on safety, health, risk and environmental issues.

Safety, health, risk and environmental management policies and procedures are integrated into the Organisation's management system and the Organisational venue operating procedures and practices.

## 5 PROCEDURE

### Duties of the Organisation

- 5.1 The Organisation will, as far as is reasonably possible, ensure:
- The health and safety of all workers whilst undertaking duties on behalf of the Organisation; and
  - That other people are not put at risk from work carried out for, or on behalf of, the Organisation.

5.2 The Organisation will, as far as reasonably possible, implement and maintain:

- A work environment that is free from risks to health and safety;
- Safe systems of work;
- The provision of appropriate information, instruction, training and supervision; and
- Ongoing monitoring and auditing of conditions associated with the Organisation's operations.

## Duties of Directors and Officers

5.3 Directors and Officers are obliged to exercise due diligence and to ensure that the Organisation is effectively discharging its WHS duties. This includes:

- Keeping up to date on WHS matters;
- Providing feedback and guidance to the Group WHS Manager on conformance of the WHSMS against the ISO 45001: 2018 Occupational Health and Safety Management Systems Standard;
- Understanding the Organisation's operations, hazards, risks and control mechanisms;
- Ensuring there are the right resources and processes available to eliminate or effectively manage risks to health and safety;
- Understanding the processes and systems used by the Organisation to comply with its WHS duties; and
- Implementing adequate mechanisms for receiving, considering and acting on relevant information regarding incidents, hazards and control mechanisms.

## Duties of the WHS Manager

5.4 The Group WHS Manager will:

- Lead and facilitate the continuous improvement of the WHSMS;
- Facilitate conformance of the WHSMS against the ISO 45001: 2018 Occupational Health and Safety Systems Standard;
- Report to senior management on the Organisations WHS performance (lead and lag indicators);
- Provide insights and potential implication of legislative change/update to Senior management;
- Escalate significant WHS risk, performance/industry trends and incidents as required.

## Duties of Managers

5.5 Whilst the Organisation has the overall responsibility to provide a safe workplace, safe managements systems and environmentally friendly operational systems, each manager is expected to:

- Provide leadership and model appropriate attitudes to WHS matters;
- Ensure local site level conformance of the WHSMS against the ISO 45001:2018 Occupational Health and Safety Management Systems Standard;
- Proactively assist in identifying and managing potential WHS issues;
- Ensuring timely and accurate WHS hazard, incident and injury reporting and management;
- Respond promptly and appropriately with WHS reports;
- Provide feedback to senior management and the Group WHS Manager on the performance of the WHSMS
- Ensure workers have access to workplace adjustments to prevent deterioration of their health;
- Verify that the right training, instruction and supervision is available to workers;
- Ensure provision of correct WHS information to workers; and
- Escalate matters to the Speak Up hotline when necessary.

## Duties of Employees

- 5.6 Whilst at work, employees have a responsibility to:
- Take reasonable care for their own health and safety and the health and safety of others who may be affected by their acts or omissions;
  - Comply with the organisation policies and procedures for safety, health, risk and environmental management, including complying with any reasonable instruction or direction given by the Organisation to ensure compliance with WHS obligations; and
  - Promptly report and record WHS risks, hazards, incidents and injuries in accordance with the Organisations procedures.

## Duties of other people (including visitors)

- 5.7 If a person is not a worker, but attends a facility that is under the Organisation's management or control (for example, visitors), they must:
- Take reasonable care of their own health and safety;
  - Take reasonable care that their actions or omissions do not adversely affect the health and safety of others; and
  - Comply, so far as they are able, with any instructions that may be given by the Organisation regarding WHS obligations.

## Consultation

- 5.8 The Organisation is required to consult with other WHS duty holders and other workers (including employees, contractors and volunteers), as far as reasonably practical. This is a vital aspect of the WHSMS, as it facilitates a collaborative and proactive safety culture.
- 5.9 The Organisation will consult with workers in accordance with the Health and Safety Consultation Arrangements. This includes engagement with Health and Safety Committees and Health and Safety Representatives (HSR). The Health and Safety Consultation Arrangements ensure that staff and other workers are included in decision-making where there is an impact on WHS.

## Training

- 5.10 All employees are expected to stay up-to-date with their WHS responsibilities by completing a WHS Induction, annual WHS Training and other training specific to their role type or seniority.

## Communication

- 5.11 A copy of this WHS Policy must be posted on centre WHS noticeboards. Managers must ensure that each and every worker knows about the policy.

## 6 RESPONSIBILITIES

### Compliance, monitoring and review

- 6.1 This policy / procedure:
- Aligns with relevant legislation, government policy and/or Belgravia Group requirements/strategies/values

- Is implemented and monitored (i.e. the policy is followed, reflects the changing policy environment, and emerging issues are identified), and
- Is reviewed to evaluate its continuing effectiveness (e.g. achieving its purpose, remains relevant/current).

## Reporting

- 6.2 No additional reporting is required.

## Records management

- 6.3 Staff must maintain all records relevant to administering this policy in a recognised recordkeeping system, and in accordance with WHS 1.24 Records Management.

## 7 RELATED LEGISLATION AND DOCUMENTS

Model WHS Law (Act, Regulations and Code of Practice) – Commonwealth, ACT, NSW, QLD, SA, Tas.

Occupational Health and Safety Act 2004 (VIC)

Occupational Health and Safety Regulations 2017 (VIC)

Occupational Health and Safety Act 1984 (WA)

Occupational Health and Safety Regulations 1996 (WA)

Health and Safety at Work Act 2015 (NZ)

WHS 1.00 WHS Manual References and Definitions

## 8 FEEDBACK

- 8.1 Belgravia Group staff may provide feedback about this document by emailing [msmith@belgravialeisure.com.au](mailto:msmith@belgravialeisure.com.au).

## 9 APPROVAL AND REVIEW DETAILS

Effective Date	03/09/2009
Review Date	17/03/2022
Next Review Date	17/03/2023
Policy Owner (name and role)	Liz van Deventer, Group WHS Manager
Policy Owner contact details	<a href="mailto:lvandeventer@belgravialeisure.com.au">lvandeventer@belgravialeisure.com.au</a>
Policy Approver (name and role)	Alex Lord, General Manager Corporate Services

Amendment History			
Version	Date	Author	Change description
13	11/10/2020	T O'Hara	Policy reformatted. No changes to text.
14	17/2/2021	T O'Hara	Content changes. Inclusion of ISO 45001
15	17/3/2022	L van Deventer	Grammatical/formatting and terminology adjustment to reflect legislation. Key responsibility requirements added where omitted.