

INTOWORK AUSTRALIA WORK HEALTH AND SAFETY POLICY

The objective of this policy is the provision of healthy and safe workplaces at all of the IntoWork Australia businesses and the elimination of work-related injuries and illness. IntoWork recognises that the health and safety of the employees of our businesses is the responsibility of its management in accordance with health and safety legislation. It is acknowledged that this obligation extends to staff and the placement of employees within the workplaces provided by clients.

IntoWork is committed to continuous improvement in our health and safety performance. It is the policy of IntoWork and our businesses that:

1. Senior management has a defined role, responsibility and authority for the implementation, maintenance and improvement of the business' Health and Safety Management System
2. Measurable objectives and targets are implemented for relevant health and safety functions
3. Management Plans are established and maintained for achieving the health and safety objectives and targets
4. The health and safety performance of the business is reported to senior management and the Board for review and as a basis for continuous improvement
5. Consultation arrangements are implemented for the involvement of staff, or their representative, regarding health and safety issues, facilities, training and proposed changes that may affect their health and safety
6. Competencies are developed and maintained for employees in identified needs for the effective management of health and safety
7. A risk management process is utilised for the identification, assessment and control of health and safety hazards and risks with elimination the first control to be considered
8. Potential emergency situations are identified and appropriate procedures are maintained for responding and implementing corrective action
9. Relevant documents, records and data are created and maintained for the effective implementation and review of the Health and Safety Management System and to demonstrate compliance with legislative obligations
10. Senior management implement a periodic review of their Health and Safety Management System so that it remains relevant and appropriate to the health and safety requirements and objectives of the business

Implementation of this policy at each IntoWork business is the responsibility of their senior management. The maintenance and review of this policy is the responsibility of the IntoWork CEO. The review will be conducted in consultation with senior management of the IntoWork businesses.

This policy has been developed in consultation with interested parties and with consideration to access and equity principles and legislative requirements.

A handwritten signature in black ink that reads "Poul Bottern".

Poul Bottern
Group CEO

14 August 2018

GUIDANCE NOTES

These Guidance Notes accompany the IntoWork Australia Health and Safety Policy. They are provided to assist in achieving the objective of the Policy at each IntoWork business. These guidance notes are not policy and are for guidance use only. Additional information and assistance with the development and implementation of the required management systems is available by contacting IntoWork.

1. Senior management has a defined role, responsibility and authority for the implementation, maintenance and improvement of the business' Health and Safety Management System.

Senior management has the responsibility for the development and implementation of management systems for compliance with legal obligations for providing and maintaining a safe and healthy workplace. The business should be able to demonstrate that a senior management position has been allocated the responsibility and authority for managing the health and safety systems of the business. Relevant evidence should be maintained that the person responsible is managing the implementation, maintenance and improvement of the systems. An example could be documenting the role in a position description.

2. Measurable objectives and targets are implemented for relevant health and safety functions.

Objectives are what are intended to be achieved and targets define the performance level. Objectives and targets can apply broadly across the business or to a specific area. Their application is intended for evaluating and improving health and safety performance. They should be reviewed and revised periodically. The business should be able to demonstrate that objectives and targets have been established and performance is monitored. An example could be the introduction of scheduled workplace safety inspections (objective) with three being conducted in the next 12 months (target).

3. Management Plans are established and maintained for achieving the health and safety objectives and targets.

Objectives and targets are more likely to be achieved if properly planned, resourced and a person has the designated responsibility for implementation. The target should be monitored to see if it is being met. In the workplace safety inspection example above, consideration may need to be given to who will develop the inspection checklist; training required for the person conducting the inspection; and who is responsible for any corrective action required. Relevant evidence should be maintained that a plan is in place for the achievement and monitoring of objectives and targets.

4. The health and safety performance of the business is reported to senior management and the Board for review and as a basis for continuous improvement.

Reporting systems are required so that senior management can review and improve, if necessary, the safety performance of the business. The areas to be measured and reported should provide the necessary and relevant information for this purpose. The business should be able to provide evidence of records, data or information collected and reported for monitoring and improving performance. In the workplace safety inspection example above, the evidence may include completed inspection checklists and reporting of issues and corrective action implemented at a senior management meeting.

5. Consultation arrangements are implemented for the involvement of staff, or their representative, regarding health and safety issues, facilities, training and proposed changes that may affect their health and safety.

There is a legislative requirement to consult with staff on the areas recorded in the statement. There is also a legal obligation to involve staff in the consultation arrangements to be implemented. A health and safety agenda item at a meeting may be appropriate for small businesses. Health and Safety Representatives, elected by the staff, or a health and safety committee may suit larger businesses. The business should be able to demonstrate that consultation arrangements have been

implemented with the involvement of staff and that consultation is occurring. In the workplace safety inspection example above, participation by a staff Health and Safety Representative in the inspection and in corrective action for an issue would be evidence of consultation.

6. Competencies are developed and maintained for employees in identified needs for the effective management of health and safety.

There is a legislative requirement to provide information, instruction and training so that staff can perform their work safely. Staff should also be competent to perform any function or responsibility that is part of the management of health and safety at the business. The business should be able to demonstrate that competency requirements have been identified and that staff have the necessary competency. First aid qualifications and fire warden training are two examples. In the workplace safety inspection example above, those conducting the inspection would need to be competent in conducting the inspection including hazard identification, risk assessment and control strategies.

7. A risk management process is utilised for the identification, assessment and control of health and safety hazards and risks with elimination the first control to be considered.

There is a legislative requirement to provide and maintain a workplace that is, so far as is reasonably practicable, safe and without risk to health. A fundamental principle of health and safety management is a process of identifying, assessing and controlling hazards. The elimination of the hazard is the preferred control. The hazard and associated risks must be reduced as far as is reasonably practicable if it cannot be eliminated. The business should be able to provide evidence that the risk management process required in the statement is implemented. In the workplace safety inspection example above, a tripping hazard risk associated with a worn floor covering can be eliminated by replacing or repairing the covering.

8. Potential emergency situations are identified and appropriate procedures are maintained for responding and implementing corrective action.

Potential emergency situations may be different for each business. The need for first aid facilities and evacuation procedures are common emergency situations. Each business is required to identify potential emergency situations relevant to their business. The business should be able to demonstrate that appropriate procedures, facilities and staff competency has been implemented for responding to emergency situations and taking corrective action. Examples may include having staff with first aid qualifications and training staff in evacuation procedures, including the conducting of evacuation drills. Evidence of implementing corrective action could be making changes to the workplace following the conducting an incident investigation.

9. Relevant documents, records and data are created and maintained for the effective implementation and review of the Health and Safety Management System and to demonstrate compliance with legislative obligations.

There is a legal requirement to keep information and records relating to the health and safety of staff. The records will vary depending on the nature of the operation of the business. Staff health and safety competency, health surveillance and incident information are common requirements. Documents, records and data are used to implement health and safety systems and to review performance. They can also demonstrate compliance with the requirements of the health and safety management system and legal obligations. In the workplace safety inspection example above, the completed checklist, staff competency records, and any meeting minutes recording a review of the inspection outcome are examples of information and records that should be maintained.

10. Senior management implement a periodic review of their Health and Safety Management System so that it remains relevant and appropriate to the health and safety requirements and objectives of the business.

Senior management at each business should determine the frequency of the review and the membership of the review team or external provider to be engaged. The aim of the review is to determine the management system's suitability, adequacy and effectiveness. The review should include identifying opportunities for improvement and determining changes to current or new arrangements in light of the records, information and audit findings considered. Relevant evidence should be maintained that the review was conducted and any recommendations for improvement implemented.