



Australian Government

National Health and Medical Research Council



Work Health and Safety (WHS) Policy 2019 - 2022

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Commitment

A message from the CEO

The National Health and Medical Research Council (NHMRC) is committed to the health, safety and wellbeing of our people, our visitors and others who work for us, and with us. This is a collective responsibility.

NHMRC will achieve its objective of a hazard free working environment by consulting with our people to strengthen our health and safety and rehabilitation systems, using initiatives and resources that contribute to a safe working environment and providing information, training and supervision to help us all work safely.

By developing and implementing an effective Work Health and Safety Management System (WHSMS), underpinned by effective and relevant Work Health and Safety (WHS) policies and procedures, NHMRC will meet its obligation to identify, assess, eliminate, or control, risk to worker health and safety.

The NHMRC executive promotes initiatives that uphold health, well-being and positive health choices for all workers.

Professor Anne Kelso AO

Purpose

The purpose of NHMRC's WHS Policy is to document the agency's commitment to meeting its responsibilities under the *Work Health and Safety Act 2011*¹ (*WHS Act*) and applicable Codes of Practice².

The *WHS Act* and *WHS Regulations 2011*³ provide a framework to secure the health, safety and wellbeing of workers (for clarification on who is considered a worker please see definitions in **Attachment A**). NHMRC must ensure the health and safety of workers and visitors, so far as reasonably practicable⁴. In doing so, NHMRC will deliver on its obligations through a self-managed WHSMS. This allows NHMRC to understand its risks, implement control measures and to incorporate safety into administrative processes.

To ensure that all workers are afforded the highest level of protection against harm to their health, safety and wellbeing, NHMRC will implement processes and procedures to support the elimination of risk arising from the conduct of our business.

Scope

This Policy applies to all workers (including contractors) and visitors in NHMRC workplaces for whom NHMRC holds the primary duty of care.

¹ Workplace Health and Safety Act, 2011, Compilation 9 (1st July 2018)

² <https://www.safeworkaustralia.gov.au/law-and-regulation/model-whs-laws#model-codes-of-practice>

³ Work Health and Safety Regulations, 2011

⁴ WHS Act 2011, Section 19

NHMRC Risk Management Process

The NHMRC is committed to implementing and maintaining an effective workplace safety culture, this requires a WHSMS that is structured in its delivery, has clear accountabilities and is governed by achievable and measurable performance indicators.

To achieve the highest level of positive safety outcomes for NHMRC workers, visitors and all stakeholders, and to achieve legislative compliance, NHMRC's risk management process will be founded on a WHSMS that is integrated, adopts a systematic approach, includes planning and analysis of WHS data and is supported by sufficient resources and robust communication and consultation processes.

The key principles of Australian Standard AS: 4801: *Occupational Health and Safety Management Systems – Specifications with Guidance for use*, outlines the framework for a WHSMS that is systematic, demonstrates clear responsibilities and accountabilities, and is auditable.

Attachment B lists the key principles of WHSMS as defined by the Standard.

Objectives

The WHS policy aims to demonstrate NHMRC's commitment to the workplace health and safety through the effective implementation of a WHSMS that aims to:

- prevent workplace injury, illness and disease
- minimise the impact of workplace injury, illness and disease
- reduce the number and severity of WHS risks.

Targets

NHMRC is required to identify and monitor WHS performance to support the executive in their due diligence obligations and to inform their WHS decision making, that will lead to continual improvement of the WHS management system.

Key performance indicators will be primarily lead indicative (as opposed to lag) to ensure that NHMRC processes support a proactive WHS culture rather than reactive. Therefore the following measurable targets will be used to monitor WHS performance each year:

- work health and safety training completed increased by 25%
- number of work health and safety inspections increased by 25%
- internal/external annual audits completed at 100%
- number of outstanding corrective actions reduced by 50%
- participation in >1 national safety initiative ("R U Okay? Day", White Ribbon Day etc.).

To measure the success of the above quantitative control measures, the following WHS performance data will also be gathered and included in WHS performance reports:

- number of incident / hazard reports submitted
- number of notifiable incidents occurred
- workers compensation statistics.

In addition to the key performance indicators identified above, staff feedback (including through surveys and other mechanisms) and audit outcomes (internal and external) will be used as qualitative feedback on the effective implementation and continual improvement of our WHSMS.

Example of Quarterly WHS Performance Reporting Table

Example only: Quarterly WHS Performance Reporting for period 1 July 2019 – 31 October 2019 Year To Date							
Positive Indicators					Reactive Indicators		
Measure	Staff completed mandatory WHS training*	Number of WHS inspections conducted	WHS audits completed	National safety initiatives	No outstanding Corrective actions	Notifiable Incidents	Reported incidents & hazards
Target	250**	4	1	2	0	0	0
Result	250	3	1	2	9	0	0

*Training examples include but not limited to: First Aid, SafetyHub and Comcare WHS online module.

**Total workforce (APS Employees (ongoing and non-ongoing) + Labour Hire + Contractors).

WHS Induction and Training

The *WHS Act*, Section 19(f)⁵, requires NHMRC to provide adequate information, training and supervision to allow workers to carry out their work safely. To ensure these requirements are met, NHMRC will:

- provide new workers with a copy of this policy during their induction
- provide all new workers with a robust WHS induction process that includes information relevant to their work (including the use of any plant or equipment in the workplace)
- support workers by providing access to appropriate mental health awareness training programs
- where required provide personal protective equipment (PPE), and training in the use of that PPE to new workers
- provide education and training to all workers about emergency procedures and WHS incident/ hazard reporting
- include WHS performance measures in performance agreements (workplace conversations)⁶(for example actively model and promote healthy safe work practices)
- Ensure all workers complete Comcare WHS e-learning modules available via LearnHub upon engagement, then annually thereafter
- ensure up to date WHS information is accessible to all workers via the intranet
- provide up-to-date WHS information on the intranet when legislation or information has been changed or updated
- regularly review and analyse WHS training needs and develop appropriate WHS training plans
- provide NHMRC Health and Safety Representatives (HSRs) with access to the appropriate (5 Day) training course and an annual (1 Day) refresher course to support them in their function.

⁵ WHS Act 2011, Section 19(f)

⁶ <http://intranet.nhmrc.gov.au/book/workplace-conversations/resources>

Consultation

NHMRC has a duty under the *WHS Act* Section 46 - 49⁷ to consult, so far as reasonably practicable, with all workers and visitors on matters that affect their health, safety and wellbeing. NHMRC will facilitate consultation with workers though the following processes and procedures:

- access to HSRs for their respective work groups (Canberra Office / Melbourne Office)
- the Workplace Health and Safety Committee (WHSC) will review and where appropriate escalate WHS matters between workers and executive
- Staff Consultative Forum (SCF)
- provide access and time to participate in staff surveys concerning WHS matters
- staff intranet pages relating to WHS matters will be maintained and contain up to date and relevant information
- WHS matters will be communicated through the corporate newsletter, staff circulars etc.
- relevant WHS information is appropriately communicated to staff during Branch and Section meetings
- ensure that the Workplace Conversations performance management system continues to monitor staff knowledge and understanding of WHS policies and procedures
- ensure that Workplace First Responders are accessible to all workers with regard to first aid and mental health.

Rehabilitation and Return to Work

NHMRC has a responsibility to comply with all obligations prescribed under the *Safety, Rehabilitation and Compensation (SRC) Act*⁸, including but not limited to:

- arranging an assessment of an injured worker's capability to undertake and actively participate in a rehabilitation program
- providing the determined rehabilitation program either itself or by using the services of an approved rehabilitation provider
- deciding if the employee has a reasonable excuse for failing to undertake and participate in a rehabilitation program, including attendance and cooperation in an examination.

NHMRC's Human Resources Section facilitate the following services and support for all workers:

- Employee Assistance Program (EAP)⁹
- accredited Suicide Prevention Services
- accredited workplace Harassment Contact Officers
- accredited HSRs
- accredited First Aid Officers (FAOs)
- accredited Domestic and Family Violence Contact Officers
- accredited mental health first aid training and access to accredited Mental Health First Aid Officers

⁷ WHS Act 2011, Sections 46 to 49

⁸ SRC Act, 1988

⁹ <http://intranet.nhmrc.gov.au/our-people/ohs/employee-assistance-program-eap>

- Reasonable Adjustment Policy
- early intervention.

Mental Health

NHMRC is committed to building an organisational culture that actively seeks to improve work practices and to foster attitudes which sustain both mentally and physically healthy and safe work environments. To support this commitment the following resources are accessible to all workers:

- EAP
- FAOs
- accredited Mental Health First Aid Officers (MHFAOs)
- WCOs
- regular workplace conversations with managers and supervisors
- mental health training programs for managers and supervisors
- acknowledgement of and participation in national safety event days such as “R U Okay? Day” and ‘Health and Wellbeing Month’
- annual guest speakers (lived and learned).

The above policies and services underpin the [NHMRC Mental Health Action Plan 2019 – 2022](#).

Roles, Responsibilities and Accountabilities

Person Conducting a Business or Undertaking (PCBU)

For the purpose of this policy, the Chief Executive Officer (CEO), as the principal NHMRC decision-maker, is the PCBU. The CEO establishes the agency’s values and strategic direction including WHS objectives and targets and has a responsibility to maintain up to date WHS knowledge and has overall accountability for the identification and management of NHMRC’s WHS risks and hazards.

Officers

An officer¹⁰ is a person who makes, or participates in making, decisions that affect the whole, or a substantial part of NHMRC business. However a person may be an officer, even if they do not make the relevant decisions or have the authority to do so, but they participate in the making of those decisions.

Responsibilities of NHMRC’s officers include ensuring that the PCBU has access to and is provided with up to date relevant knowledge on matters relating to WHS and supporting the PCBU in exercising due diligence in relation to their obligations under the *WHS Act* Section 27(5)¹¹.

Supervisors

Supervisors have a responsibility to use and promote this policy to ensure the provision of a safe and healthy work environment for workers within their area/section of responsibility and, in doing so, support officers to meet their due diligence obligations.

¹⁰ WHS Act 2011, Section 247(1)

¹¹ WHS Act 2011, Section 27(5)

Human Resources

The Human Resources section is responsible for the development, implementation, maintenance and communication of health, safety and wellbeing policies, procedures and projects. They will also develop initiatives that will assist all workers to understand and comply with the requirements of this policy, by:

- ensuring that quality information and legislatively compliant training is made available to all workers to allow them to fulfil their responsibilities.
- maintaining current information in regard to changes to legislation and incorporating this knowledge into changes into the WHSMS
- providing advice on health, safety and wellbeing matters
- consulting with management on the behalf of workers for health, safety and wellbeing matters
- consulting and collaborating with workers, via Health and Safety Committees and/or HSRs, on matters relating to workers' health and safety, including new policies, risks and risk management strategies.

Workers

Anyone that is conducting work for the NHMRC is considered to be 'a worker', including contractors, subcontractors, labour hire workers and committee members. All workers have a duty to take reasonable care for their own health and safety and to ensure their own acts or omissions do not adversely affect other persons. They are also required to follow reasonable instructions, policies and procedures on workplace health and safety.

Health and Safety Representatives

HSRs represent the WHS interests of workers in relation to work health and safety issues, as well as promote health and safety in the workplace. Additionally, HSRs have an important role in supporting effective communication and consultation between NHMRC and workers on WHS.

NHMRC's Workplace Health and Safety Committee (WHSC)

In accordance with the *WHS Act*, the role of the WHSC is to facilitate co-operation between NHMRC and workers in instigating, developing and carrying out measures designed to ensure workers' health and safety at work. The committee can also assist in developing policies and procedures relating to health and safety. The WHSC also supports the NHMRC executive through providing WHS data and reports.

WHS Record Keeping and Reporting

Reporting

The Human Resources section will manage all reporting for WHS incidents involving NHMRC workplaces, workers or visitors. This includes:

- reporting notifiable incidents¹² to Comcare
- collecting and recording data from incidents
- providing WHS information to relevant managers / supervisors where required

¹² WHS Act 2011, Section 35

- providing WHS information and data to the WHSC on a quarterly basis (the WHSC will report and escalate to the executive as required).

Workers have the responsibility to report all identified WHS hazards and incidents, as outlined by the NHMRC Incident Reporting and Investigation Policy.

Record Keeping

The Human Resources section will ensure that incident and hazard records are kept in accordance with relevant legislative and governance frameworks¹³ and the [NHMRC Incident Reporting and Investigation Policy](#).

Definitions

Definitions are located at **Attachment A**.

Review of this Policy

This policy will be reviewed every two (2) years, or following any significant change in business practices or changes to legislation.

Contact Information

Policy Manager	Director, Human Resources
Policy Contact Officer	Director, Human Resources

Document history of changes to the policy

Effective date	Last update	Policy version number	Notes

Note:

“NHMRC will make proposed changes to any policy, procedure or guideline that is in place to support the operation of this Agreement available to the Staff Consultative Forum for comment and feedback for a minimum period of two (2) weeks. The NHMRC will take into account any comments or feedback received in relation to the proposed changes prior to the employment policy, procedure or guideline being finalised.”¹⁴

¹³ Archives act, 1983 & Public Service Act

¹⁴ NHMRC Enterprise Agreement 2016-19, Clause 200

Definitions

Worker¹⁵

A person is considered a worker if the person carries out work in any capacity for a PCBU. This includes but is not limited to; employees, contractors and subcontractors (and their employees), employees of labour hire companies conducting work for the PCBU, student interns and volunteers.

Due Diligence¹⁶

In making decisions with respect to NHMRC business and undertakings, due diligence requires the PCBU and Officers to take all reasonably practical steps to:

- Acquire and keep up-to-date knowledge of WHS matters
- Gain an understanding of the nature of NHMRC's operations and of the hazards and risks associated with those operations
- Ensure that NHMRC has available for use, and uses, appropriate resources and processes to eliminate and minimise risks to health and safety from work carried out as part of the conduct of the business or undertaking
- Ensure NHMRC has appropriate processes for receiving and considering information regarding incidents, hazards and risk and responding in a timely way to that information
- Ensure NHMRC has, and implements, processes for complying with its duties and obligations under the *WHS Act*

Officer¹⁷

Refers to a person who makes, or participates in making, decisions that affect the whole, or a substantial part, of NHMRC's business or undertakings.

Person Conducting a Business or Undertaking (PCBU)¹⁸

For the purpose of this Policy, PCBU is a reference to the NHMRCs CEO as the responsible person representing the Commonwealth.

Primary Duty of Care¹⁹

To ensure as far as is reasonably practicable the health and safety of workers engaged, or caused to be engaged, and whose activities in carrying out work are influenced or directed by NHMRC. NHMRC must further ensure the safety of all

¹⁵ WHS Act 2011, Section 7

¹⁶ WHS Act 2011, Section 27

¹⁷ WHS Act 2011, Section 247

¹⁸ Safe Work Australia Publication – [Interpretive Guideline – Model WHS Act The Meaning of 'Person Conducting a Business or Undertaking'](#)

¹⁹ WHS Act 2011, Section 19

other persons, including visitors, is not put at risk from the conduct of work undertaken by NHMRC.

Reasonably Practicable ²⁰

In relation to a duty to health and safety 'reasonably practicable' means that which is, or was at a particular time, reasonably able to be done in relation to ensuring health and safety, taking into account and weighing up all relevant matters.

²⁰ WHS Act 2011, Section 18

The Australian Standard AS: 4801: Occupational Health and Safety Management Systems

The Australian Standard AS: 4801: *Occupational Health and Safety Management Systems – Specifications with Guidance for use* standard defines Key principles of WHSMS as follows:

Commitment and policy: Through its WHS policy, top management should clearly state the organisation’s overall WHS objectives and demonstrate commitment to improving WHS performance.

Planning: The successful implementation and operation of the WHSMS requires an effective planning process with well-defined and measurable outcomes.

Implementation: For effective implementation an organisation should involve its people, develop capability and make other changes necessary to achieve the organisation’s WHS policy, objectives and targets. WHS risk management is a key element of implementation.

Measurement and evaluation: An organisation should measure, monitor and evaluate its WHS performance, and take preventative and corrective action.

Review and improvement: An organisation should regularly review its WHSMS to improve its overall WHS performance. Regular review underpins continuous improvement, which is a fundamental principle of the WHSMS.

Documentation supports a consistent application of systems, provides the basis for informing workers of NHMRC’s WHS objectives and is integral to demonstrating that NHMRC is meeting its legislative responsibilities. The NHMRC WHSMS structure, including policies, processes and procedures, is outlined below:

Commitment & Policy

- NHMRC Work Health & Safety Policy

Planning

- NHMRC Work Health & Safety System (WHSMS) Document
- NHMRC Mental Health Action Plan 2018 - 2020
- NHMRC Hazard & Risk Register
- NHMRC Corrective Actions Register
- NHMRC Audit Schedules (Internal & External)
- NHMRC WHS Inspection Schedules
- NHMRC Document Register – include WHS policies and procedures (in Draft)
- WHS Executive Reporting Template/documents

- NHMRC WHS Committee membership

Implementation

- NHMRC WHS Information Procedure
- NHMRC Education, Awareness and Skilling Procedure
- NHMRC Reasonable Adjustment Policy
- NHMRC Hazard Identification & Risk Management Procedure
- NHMRC Plant & Equipment Procedure
- NHMRC WHS Contractor Management Policy
- NHMRC Consultation & Communication Procedure
- NHMRC Emergency Preparedness & Response Procedure
- NHMRC First Aid Procedure
- NHMRC Fitness for Duty Policy
- NHMRC Return to Work Policy
- NHMRC Flexible Working Arrangements Policy
- NHMRC Review of Actions Policy
- NHMRC WHS Committee Terms of Reference (TOR)
- NHMRC Dealing with suicide in the workplace – a guide for managers
- NHMRC Workplace Conversations performance management system
- First Aid Officer Training
- Provision and maintenance of first aid equipment, supplies and rooms
- Emergency management training – evacuation exercises conducted
- Emergency evacuation plans provided in the workplace
- Consultation and communication processes and procedures are in place to consult with property section and building owner on emergency management and matters that affect NHMRC worker health, safety and wellbeing
- Commonwealth Safety Management Forum (CSMF) membership and meeting attendance
- NHMRC subscription to, receives regular updates from, Comcare and Safe Work Australia on WHS matters, including changes to WHS legislation
- NHMRC Staff Consultative Forum (SCF)
- NHMRC WHS Committee meetings
- NHMRC Intranet – WHS Information & Communication, management updates, corporate newsletters, staff circulars
- NHMRC Health and Safety Representatives (HSR's)
- WHS floor walk inspections
- NHMRC induction processes
- NHMRC WHS Training Register
- Maintenance of plant & equipment – including electrical test and tag
- Mental Health First Aid Training
- Ergonomic Work Station Assessments
- Annual Flu Vaccination Program
- Acknowledgement of and participation in Safety Month and “R U Ok? Day”
- Engaging Speakers - Subject Matter Experts.

Measurement & Evaluation

- NHMRC WHS Performance Management Procedure
- NHMRC WHS Quarterly Report
- Internal Audit Committee
- Internal Audit Reports/documentation
- External Audit Reports/documentation.

Review & Improvement

- Internal Audit Committee
- Internal Audit Reports/documentation
- External Audit Reports/documentation
- Engagement of external industry experts for advice and mentoring
- NHMRC dedicated resource to manage WHS
- NHMRC internal Policy review section
- NHMRC consultation processes
- NHMRC WHS Inspection schedule – Action items

NHMRC WHS Committee – Action items and Executive reports

Attachment C

Relevant Legislation, Guidance and Codes of Practice

This Policy should be read in conjunction with:

- [Work Health and Safety Act 2011 \(WHS Act\)](#)
- [Work Health and Safety Regulations 2011](#)
- [Public Service Act 1999](#)
- [Safety, Rehabilitation and Compensation Act 1988](#)
- [Disability and Discrimination Act 1992](#)
- [Privacy Act 1988](#)
- [Public Governance, Performance and Accountability Act 2013](#)
- [Managing Risks in the workplace Code of Practice](#)
- [WHS Consultation, Co-operation and Co-ordination Code of Practice](#)
- [Code of Practice on First Aid in the Workplace](#)
- [Code of Practice on How to Manage Work Health and Safety Risks](#)
- [Guide to the Model Work Health and Safety Act](#)
- [Guide to the Model Work Health and Safety Regulations](#)
- [How to determine what is Reasonably Practicable to meet a Health and Safety Duty](#)
- [Interpretive guidelines under the Model Work Health and Safety Act](#)
- [Officer's duty, AGS Fact Sheet Number 17 \(November 2011\) – pdf](#)

- [Interpretive Guideline – model Work Health and Safety Act – the health and safety duty of an officer under section 27](#)
- [Roles and responsibilities - Comcare](#)
- [Worker Representation and Participation guide](#)
- [Approved Codes of Practice](#)
- [Comcare](#)
- [Safe Work Australia](#)
- [Employee Assistance Program](#)
- [First Aid officers](#)
- [Reasonable Adjustment Policy](#)