

## PROCEDURE C25.4-P25.4

# HEALTH, SAFETY AND FIRST AID IN THE WORKPLACE

## 1.0 INTRODUCTION

### 1.1 Related Policy

Health, Safety and First Aid in the Workplace Policy

### 1.2 Purpose

This procedure outlines the responsibilities and processes involved in health, safety, and first aid for students and Workers at the Scentia Group of organisations, encompassing the Australasian College of Health and Wellness Pty Ltd (ACHW), the Australian Institute of Management Education and Training Pty Ltd (AIM) operating as AIM Business School (ABS), and AIM VET, a Registered Training Organisation (RTO), (collectively 'the Scentia Group') and TPPs.

### 1.3 Scope

This procedure applies to all students and Workers (defined by legislation as employees [staff], contractors, agency staff, labour hire staff, people on work experience, sub-contractors, volunteers, trainees, and outworkers) of the Scentia Group and TPPs.

This procedure applies to all facilities used by the Scentia Group and TPPs, including online operations and learning environments, physical offices, campuses, hired facilities and external clinics.

### 1.4 Scope Exceptions

None.

## 2.0 RESPONSIBILITIES

1. Under the Work Health and Safety Act (2011) health and safety in the workplace is the responsibility of all - everyone has a duty of care to ensure the safety of themselves and others.
2. The specific, legislated responsibilities detailed in the Health, Safety and First Aid in the Workplace Policy apply equally to this procedure and cannot be delegated.
3. The Head of People and Culture is responsible to manage and maintain specific policy statements and procedures for health, safety and first aid in the workplace.

4. The Head of People and Culture is responsible to receive and act on reports of hazards, injuries and staff incidents, maintain a *WHS Hazard, Incident and Injury Register*, and provide reports to committees and boards as required under terms of reference to assist committees and boards with their legislated work health and safety responsibilities.
5. The Executive Director is responsible to receive and act on reports by students about hazards, and reports of student incidents and injury, including bullying, discrimination, and critical incidents, and to maintain a *Student Incidents Register*.
6. The Executive Director is responsible to provide student-related health and safety reports to committees and boards as required under terms of reference to assist committees and boards with their legislated health and safety responsibilities.
7. Reports that may present a conflict of interest with the Head of People and Culture and the Executive Directors should be made to the CEO.
8. The Student Welfare Committee is responsible to oversee student WHS incidents and make recommendations and reports to the WHS Committee.
9. The WHS Committee is responsible for monitoring WHS reports and resolutions, identifying risks and making recommendations to changes to processes and policies.
10. The Audit and Risk Committee is responsible to oversee health and safety risk management.
11. The Audit and Risk Committee is responsible to provide reports to the AIM and ACHW Corporate Board which include health and safety risk management.
12. Workers and students are responsible to comply with this procedure and with their own legislated responsibilities for health and safety.

## 3.0 PROCEDURE

### 3.1 Consultation

1. Consultation and ongoing dialogue with students, Workers and others is an essential element of the Scentia Group's health, safety and first aid processes. The primary purpose of consultation is to share relevant information with stakeholders and to provide them with an opportunity to contribute to health, safety, psychological safety and first aid issues within their organisation. This in turn enhances the Scentia Group's ability to identify and control hazards, improving outcomes for all stakeholders.
2. Information to and consultation on health, safety and first aid may take place through:
  - student and Worker orientation/induction;

- Student Handbooks and Guides;
  - policies and procedures;
  - clinic-specific ACHW policies and procedures for ACHW students/ workers;
  - response to incidents, including investigation and improvements.
3. Under the Work Health and Safety Act (2011) ('the Act') consultation with Workers must happen when:
- identifying hazards and assessing risks to health and safety arising from the work carried out or to be carried out by the business or undertaking;
  - making decisions about ways to eliminate or minimise those risks;
  - making decisions about the adequacy of facilities for the welfare of Workers;
  - proposing changes that may affect the health or safety of Workers;
  - making decisions about the procedures for:
    - a. consulting with Workers;
    - b. resolving work health or safety issues at the workplace;
    - c. monitoring the health of Workers;
    - d. monitoring the conditions at any workplace under the management or control of the person conducting the business or undertaking;
    - e. providing information and training for Workers;
    - f. electing Health and Safety Representatives (HSR's), if requested; and
    - g. first aid.
  - making decisions about the number, location, and contents of first aid kits and other equipment, the type of first aid facilities that may be needed, and the number of first aiders; and
  - carrying out any other activity prescribed by the Act's regulations.
4. Consultation with Workers takes place at three levels:
- Health and Safety Representatives (HSRs): where Workers request it, HSRs are elected by their colleagues to represent them on health and safety matters. Elections of HSRs are carried out in accordance with the Act. An HSR may investigate health and safety complaints from Workers, including those about access to first aid, inspect the workplace after the

provision of reasonable notice and issue provisional improvement notices.

- **WHS Committee:** The WHS Committee is comprised of representatives from all areas of the Scentia Group, including senior leaders, People and Culture and Facilities Management, and must include the HSRs (if in place). The WHS Committee meets regularly to review health, safety and first aid issues in the workplace, identify corrective action and to provide strategic input into the management of health, safety and first aid in the organisation.
- **Work Units:** all managers, supervisors and team leaders are responsible for discussing health, safety and first aid issues on a regular basis with Workers (and others, where necessary) in their areas.
- All Corporate Boards, the WHS Committee and Audit and Risk Committee meetings have minutes recorded and include health, safety and first aid as a standing agenda item which covers risks currently being assessed, changes to the workplace which affect health, safety and access to first aiders or first aid equipment, and ad-hoc health and safety topics which need to be raised or resolved.

### 3.2 Health and Safety Risk Management

1. The Scentia Group and TPPs have in place a system to eliminate reasonably foreseeable health and safety risks or, where this is not reasonably practicable, to control risks. Risk management is the process of finding and fixing health and safety problems, with the basic steps being:
  - identifying hazards;
  - assessing the risk to health and safety of those hazards;
  - eliminating or controlling the hazards; and
  - monitoring and reviewing control measures to ensure ongoing safety.
2. Health and safety risks in External Clinics are managed in accordance with this policy and procedure and the External Clinics Policy and Procedure.
3. Infectious diseases and infection prevention and control are managed in accordance with the Infectious Diseases and Infection Prevention and Control Policy and Procedure, and this procedure.
4. Education materials and training are provided to Workers and students on health and safety, psychological safety and first aid which includes directions on identifying and reporting hazards.

### 3.3 Hazard Identification

1. A hazard is anything (including work practices or procedures) that has the potential to harm the health or safety of a person. Hazards can be identified by a range of methods, including:
  - considering the steps involved in the task and what hazards there are at each of these steps;
  - analysing incidents and workers compensation data;
  - consulting with workers e.g., in team meetings;
  - consulting with students in individual or group settings;
  - understanding any hazards associated with the industry (including in workshops and clinics); and
  - inspecting the workplace (and clinics in the case of ACHW).
2. Any hazards identified by Workers must be reported to the Head of People and Culture on the *WHS Incident, Hazard and Injury Report* form.
3. Hazards identified by students must be reported to Student Support, who will pass the information to the Executive Director who will act on the reported hazard, and notify the Head of People and Culture that a hazard has been reported.
4. Reported hazards are recorded on the *WHS Hazard, Incident and Injury Register* by the Head of People and Culture and followed up to confirm hazard elimination or control.
5. Hazard identification and reporting at ACHW's External Clinics is performed in accordance with the External Clinics Policy and Procedure.
6. Hazards relating to psychological safety can be reported confidentially to the Head of People and Culture (staff) or the Executive Director (students). Where there is a conflict of interest with the aforementioned roles, a report can be made to the CEO.

### 3.4 Health and Safety Risk Assessment

1. An annual risk assessment audit is conducted by the WHS Committee, through nominated delegates, in each organisation of the Scentia Group, on each campus, in consultation with Workers. This is separate to regular fire drills, which are in addition to the risk assessment audit.
2. TPPs conduct their own risk assessment audits and report the result of these to the Executive Director.
3. A risk assessment matrix is used to assess and document the risk associated with each identified hazard.

4. Risk assessment considers any hazard identified in the workplace and/or learning environment, to determine the probability of and consequences expected from an incident.
5. When assessing a risk, all reasonably available health and safety information on the hazard is examined. This includes, for example:
  - Plant or equipment instruction manuals.
  - Material safety data sheets.
  - Records of previous incidents.
  - Regulatory information.
6. The result of the risk assessment is reported to the Audit and Risk Committee, with recommendations for improvement. The Audit and Risk Committee provides reports as required by its terms of reference and monitors the implementation improvements.
7. Risk assessment is also conducted when new equipment or chemicals are purchased.
8. Risk assessment in External Clinics is conducted in accordance with this policy and procedure and the External Clinics Policy and Procedure.
9. A risk assessment matrix is used to assess and document the risk associated with each identified hazard.

### **3.5 Elimination or Control of Hazards**

1. Once hazards have been identified and the associated risk assessed, action to eliminate or control these hazards is put in place. The action taken will depend on the nature and risk of the hazard and can include, for example:
  - substituting a hazardous substance, equipment, process, or task with a safer alternative; and/or
  - isolating the hazard from people; and/or
  - minimising the risk by engineering means; and/or
  - minimising the risk by administrative means, for example, by adopting safe working practices or providing training, instruction, or information and adequate supervision; and/or
  - providing personal protective equipment (PPE) if required.
2. The Head of People and Culture work in conjunction with relevant stakeholders throughout the Scentia Group to eliminate and control hazards, and oversight is provided by the Audit and Risk Committee using reports from the Work Health and Safety Committee.

### 3.6 Monitoring and Review of Control Measures

1. Control measures continue to be monitored and reviewed to ensure:
  - measures have been properly implemented;
  - Workers and students are complying with these control measures;
  - the control measures continue to adequately manage the risks; and
  - the control measures have not introduced any other hazard into the workplace.
2. The Executive Leadership team monitor the implementation of health and safety risk assessment and control recommendations in their area and provide progress reports to the Work, Health and Safety Committee. The chair of the Work Health and Safety Committee provides work health and safety reports to the Audit and Risk Committee, which reports to the Corporate Board.

### 3.7 Incident Reporting - Workers

1. Incident reporting and investigation of health, safety and first aid issues are a vital part of the Scentia Group's health, safety and first aid management and is necessary for better understanding and control of hazards and risks.
2. All Workers are required to complete a *WHS Hazard, Incident and Injury Report* form for all incidents including:
  - any workplace accident in both physical premises or the online business and learning environment;
  - any workplace incident where a person's safety is put at risk, including if this was caused by inadequate access to first aid;
  - the occurrence of an injury - physical or psychological; and
  - near misses (events which have the potential to cause any of the above outcomes).
3. The *WHS Hazard, Incident and Injury Report* form is provided to Executive Directors or Heads of departments/units for investigation in the first instance. Where incidents are of a highly sensitive nature, workers are able to report confidentially to Head of People and Culture.
4. Incidents at External Clinics are managed in accordance with the External Clinics Policy and Procedure.
5. The Head of People and Culture must immediately notify the state's Safe Work Australia branch and Work Cover of any serious incidents and accidents (as defined by regulations).

### 3.8 Incident Reporting - Students

1. Students on-campus, including at TPPs, report incidents to their academic supervisor (lecturer, facilitator, for example), complete a *WHS Hazard, Incident & Injury Report* and provide this to the Campus staff or TPP role equivalent.
2. Students studying online must report incidents by email to Student Support, who will notify the Executive Director, who will act on any immediate risk reduction needed. Student Support will send an incident report to the student and will liaise with them regarding the level of detail required. Once the incident form is received back from the student, Student Support will provide it to the Executive Director, who will record it on the Student Incidents Register and commence any other actions needed to support the student.
3. Incidents at External Clinics are managed in accordance with the External Clinics Policy and Procedure, reported first to the supervising Facilitator, and a *WHS Hazard, Incident and Injury Report* completed and returned to the Executive Director, ACHW.
4. Student incidents are recorded on the Student Incident Register by the Executive Director or TPP. TPPs must also notify the Executive Director who will record the incident on the Student Incident Register.

### 3.9 Critical Incident

1. In the case of a critical incident - see definition and Table 1 - the Critical Incident Policy and Procedure must be initiated in addition to this procedure.

<p><b>*Critical Incident</b></p> <p>*Note: an incident classified as major is viewed as a critical incident.</p>	<p>May involve death and/or very serious or significant numbers of injuries, and cause stress and fear.</p> <p>May result in major damage to infrastructure and/or the environment.</p> <p>May impact severely on operations, possibly for a considerable duration.</p> <p>May result in high financial losses and may cause possible or actual reputation loss.</p>	<p>Health, Safety and First Aid in the Workplace Policy and Procedure</p> <p style="text-align: center;">AND</p> <p>Critical Incident Policy and Procedure</p>
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Table 1: Critical Incident

### 3.10 Investigation

1. The immediate supervisor of the Worker involved in the incident and/or the Executive Director if a student is involved, undertakes an initial investigation of the incident and resolve issues by:
  - completing a risk assessment and risk rating;
  - escalating the incident immediately to People and Culture for High-Risk incidents;



- developing a Corrective Action Plan using a combination of controls (elimination, substitution, engineering control, administrative control) and following up to ensure actions have been completed;
  - taking immediate corrective action for minor incidents such as removing obstacles from walkways or refer the issue to facilities management.
2. More serious incidents are investigated by an appropriate manager or external investigator, and recommendations as to corrective action are made to Head of People and Culture and followed up and monitored by the Audit and Risk Committee.

### 3.11 Privacy, Confidentiality and Record Keeping

1. The Head of People and Culture maintains a *Work Health and Safety (WHS) Hazard, Incident and Injury Register*. This register records all reported hazards and the associated corrective actions. Risk assessment of the hazard prior to and after controls is also recorded.
2. The *WHS Hazard, Incident and Injury Register* is tabled at each Work Health and Safety Committee meeting to continue monitoring and oversight.
3. *Student Incident Registers* are maintained by the Executive Director and tabled at the Work, Health and Safety Committee.
4. Health and safety (including report forms and registers) for Workers are maintained by the People and Culture Unit. A copy of incidents and injuries is kept in the Worker's file.
5. Health and safety records (including report forms and incident registers) for students are maintained by the Executive Director.
6. Copies of documentation resulting from student incidents and injuries are kept in the student file.
7. Reports reviewed by the Student Welfare Committee and WHS Committee are de-identified where relevant to maintain privacy and confidentiality.

### 3.12 Reporting, Evaluation and Risk Management

1. Scentia utilises a risk management approach to health and safety which is outlined in the Scentia Risk Management Policy. Risk is monitored by the Audit and Risk Committee and captured in the Corporate Risk Register.
2. Additional factors are used to inform the risk assessment including but not limited to:
  - industry characteristics that may affect staff and students
  - industry-relevant WHS guidance, including approved Codes of Practice which set out what is reasonably practicable to manage hazards under WHS laws.

3. Regular reports on risk are made to the Corporate Board by the Audit and Risk Committee to confirm that sufficient and adequate risk mitigation controls are in place.
4. Data analytics and recommendations are presented to the Corporate Board to determine compliance with WHS and evaluate effectiveness of policies, processes and control measures in place. Data reports may include but are not limited to:
  - Student and staff feedback.
  - Formal and informal incidents and actions taken, including nature and frequency.
  - Number of and response to hazards and incident.
  - Number of incidents through WorkCover.
5. Data and reports are prepared in accordance with privacy and confidentiality requirements as outlined in clause 4.11 of this procedure.

### 3.13 First Aid

1. First Aid Kits are available:
  - in easy to access areas, including in areas where facilities are shared by more than one organisation;
  - in sufficient numbers across each Scentia Group organisation to facilitate quick access in the case of an emergency; and
  - close to areas where risk of injury /illness may be higher than normal, for example, in clinics or where there are individuals with known disabilities or health concerns.
2. First aid signs must be visible and be the highly recognised standard in the community.
3. First aid training should be provided to Workers to ensure that there are the sufficient numbers of first aiders across the organisation. The following ratios are recommended by the Act:
  - low risk workplaces (Scentia Group facilities) - one first aider for every (or up to) 50 people.
  - high risk workplaces (external clinics) - one first aider for every (or up to) 25 people.
4. First aid access and effectiveness are included in regular health and safety audits and in the investigation of incidents.

## 4.0 DEFINITIONS

- **Consequence** - the specific effect of an event/incident occurring.
- **Critical Incident** - an adverse incident, or series of events that have the potential to seriously damage an organisation's people, operations, or reputation; a traumatic incident or threat of such which causes extreme stress, fear, or injury.
- **First aid** is the immediate treatment or care given to a person suffering from an injury or illness until more advanced care is provided or the person recovers.
- **First aider** is a person who has successfully completed a nationally accredited training course or an equivalent level of training that has given them the competencies required to administer first aid.
- **First aid equipment** includes first aid kits and other equipment used to treat injuries and illnesses.
- **First aid facilities** include first aid rooms, health centres, clean water supplies and other facilities needed for administering first aid.
- **Hazard** - A hazard is a source of potential harm or a situation with the potential to cause harm to people, property, or the environment.
- **Health and safety representative** - in relation to a worker, means the health and safety representative elected for the work group of which the worker is a member.
- **High risk workplace** - a workplace where workers are exposed to hazards that could result in serious injury or illness and would require first aid.
- **Likelihood** - The chance of the consequences of an event.
- **Low risk workplace** - a workplace where workers are not exposed to hazards that could result in serious injury or illness, such as offices, shops or libraries. Potential work-related injuries and illnesses requiring first aid would be minor in nature.
- **Psychological safety** - Involves creating an environment where individuals feel comfortable expressing themselves, taking risks, and sharing their ideas without fear of reprisal or judgment.
- **Risk** - A risk is the chance of something happening that will have an impact on objectives. It is measured in terms of consequences and likelihood. In the WHS context, risk should be thought of as the WHS consequence of a given severity, and the likelihood of that particular consequence occurring.
- **Risk Rating** - The process that produces a risk level for the activity. This is a combination of the consequence of a risk and the likelihood those consequences will occur.

- **Students** - All individuals enrolled to complete an education program with the Scentia Group or TPPs either online, in face-to-face mode or in blended delivery.
- **Workers** - include employees, contractors, agency staff, labour hire staff, people on work experience, volunteers, sub-contractors, trainees and outworkers.
- **Workplace** - a place where work is carried out for a business or undertaking and includes any place where a worker goes, or is likely to be, while at work.

## 5.0 REFERENCES AND ASSOCIATED INFORMATION

- ACHW Clinical WHS Manual
- ACHW Clinical Quality Assurance Framework
- ACHW Facilitator Guide
- ACHW Equipment Procedures
- ACHW External Clinics Policy and Procedure
- Alcohol and Drugs Policy
- Australian Laser Safety Standards
- Bullying, Harassment and Discrimination (Staff and Students) Policy
- Critical Incidents Policy
- External Clinics Policy
- Health, Safety and First Aid in the Workplace Policy
- Higher Education Standards Framework (2021)
- Infectious Disease and Infection Prevention and Control Policy
- Rehabilitation and Return to Work Policy
- Sexual Assault and Sexual Harassment Prevention and Response Policy
- Staff and Student orientation and induction programs
- Staff Code of Conduct
- Staff Grievances Policy
- [State-based Work, Health and Safety Acts and Codes](#)
- Student Code of Conduct
- Student Grievances and Complaints Policy and Procedure.

- Student Incident Register
- Work Health and Safety Act (2011) (Commonwealth) and Regulations
- Work Health and Safety (First Aid in the Workplace) Code of Practice 2015
- Work Health and Safety (WHS) Hazard, Incident and Injury Report Form
- Work Health and Safety Hazard, Incident and Injury Register
- Governance Manual
- Delegations of Authority Policy and Procedure
- Risk Management Policy

## 6.0 POLICY/PROCEDURE OWNERSHIP

Policy Owner	Chief Executive Officer (CEO)
Status	Reviewed on December 2023
Approval Authority	Scentia Corporate Board, with endorsement by ACHW and AIM Corporate Boards
Date of Approval	13/12/2023
Effective Date	13/12/2023
Implementation Owner	Head of People and Culture
Maintenance Owner	Head of Compliance
Review Due	December 2026
Content Enquiries	Liz Douglas - Head of People and Culture Email: <a href="mailto:ldouglas@scentia.com.au">ldouglas@scentia.com.au</a> Executive Director for students and academic staff if required.

## 7.0 AMENDMENTS

Version	Amendment Approval (Date)	Amendment Made By (Position)	Amendment Details
C25.0-P25.0	10 July 2017	Head of Compliance / Director ACHW	Initial document review after purchase of MHMHE
C25.1-P25.1	10 March 2020	Academic Board	General review
C25.2-P25.2	18 January 2021	Academic Board	Added that vaccination against Hepatitis B is compulsory for all students before they attend clinics.

Version	Amendment Approval (Date)	Amendment Made By (Position)	Amendment Details
C25.3-P25.3	21 October 2021	Scentia Corporate Board	<p>Policy and Procedure separated. New proforma.</p> <p>Became a Scentia Group policy applying across the Scentia group, with the new title Health, Safety and First Aid in the Workplace, incorporating and replacing the following policies:</p> <ul style="list-style-type: none"> <li>• Scentia Work, Health and Safety Policy July 2020</li> <li>• ACHW Policy 20200118v3 Work, Health and Safety Policy January 2021</li> <li>• AIM/ABS Work, Health and Safety Policy March 2021.</li> </ul> <p>Injury management, return to work, and rehabilitation clauses removed, but retained in the revised Scentia corporate policy Rehabilitation and Return to Work.</p>
C25.4-P25.4	13 December 2023	Corporate Board	Added reference to Psychological Safety and reference to the WHS Committee