



Workplace Health & Safety Policy

Details

Policy & Procedure Owner	CEO Office	
Approved by	ERFA Board of Directors	
Date Approved	Date of Last Revision	Next Review
2013	September 2021	September 2025

Abbreviations

ACFID	Australian Council for International Development
ERFA	Edmund Rice Foundation Australia
ERFK	Edmund Rice Foundation Kenya
PCBU	Person conducting a business or undertaking
WHSO	Workplace Health and Safety Officer
WHSP	Workplace Health and Safety Policy

Definitions

Associates	Anyone in the community who interacts with ERFA Staff and Partners
ACFID Member	A not-for-profit organisation that has obtained accreditation with ACFID
Beneficiary	Children and adults who participate in and benefit from ERFA-funded programs
Donation	A voluntary contribution or gift, whether in cash or in kind. Donations must be made voluntary and by way of benefaction
Donor	Members of the public who contribute to ERFA in cash or in kind
Partner	Any organisation which has an MOU / contract with / or receives funding from ERFA
Program	Programs are overarching development approaches and initiatives that set priorities and guide project outcomes, results and activities. Programs can comprise ministries or entities
Projects	Projects are the development activities of a Program supported by ERFA
Project Beneficiaries	Children and adults who participate in and benefit from ERFA-funded programs
Staff	Employees, contractors, subcontractors, outworkers, apprentices and trainees, work experience students, volunteers, employers and any other person who performs work for ERFA or ERFK
WHS	Workplace Health & Safety
WHS Act	The Queensland Workplace Health and Safety Act 2011
WHS Regulations	The Queensland Work Health and Safety Regulations

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Related policies

- Human Resources Policy
- Safety & Security Policy

Related forms

- Queensland Work Health and Safety Act 2011 (WHS Act)
- Queensland Work Health and Safety Regulations 2011 (WHS Regulations)
- Enabling Safe and Healthy Workplaces for Small Business

Compliance

This policy applies to all staff and associates that act for, represent or visit ERFA and ERFA funded programs. Failure by ERFA funded partners to fully comply with any aspect of this policy could result in immediate termination of funding.

Organisational overview

Edmund Rice Foundation Australia (ERFA) believes education is the key to sustainable change. We are an international development organisation that focuses on sustainable and transformational education. We operate in some of the poorest communities in the world, including in Africa, East Timor, the Philippines, and Papua New Guinea. We also partner with domestic programs in Australia. ERFA's goal is to design and implement high impact education programs that will enable our beneficiaries to stand independently and break free from the cycle of poverty. ERFA-funded education programs range from kindergartens to advanced microfinance projects and are designed with the needs of the community at their core.

Legal definitions

Edmund Rice Foundation (Australia) is a company limited by guarantee. The objects of the company are set out in clause 3 of ERFA's constitution. Clause 3 (f) reads as follows:

To develop partnerships with overseas aid agencies or formal arrangements with other delivery agents related to the Company but resident in Developing Countries for the implementation of the objects in paragraph (a).

One of ERFA's roles is to act as trustee of the Edmund Rice Overseas Aid Fund.

Throughout its policies and official documentation ERFA uses the term Partners for those organisations with which it has formed alliances in developing countries for the receipt of overseas aid funding for the in-country delivery of education programs. Whilst ERFA has an active, engaged and qualitative role with these programs, working to build capacity and maximise the impact of best practice development outcomes, these are not partnerships in the legal sense. Rather they are alliances that ERFA has formed with in-country organisations with whom ERFA has communicated its vision, mission, values, policies and expectations with respect to sustainable development and whose own vision, mission, values, policies and development goals are congruent with those of ERFA. The in-country organisations implement the programs and ERFA supports them.

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1.0 Policy overview

Edmund Rice Foundation Australia (ERFA) is committed to providing a safe and healthy work environment for its Staff. While the activities undertaken at our centres are not inherently dangerous, like any workplace there is a potential for a hazard to take place if adequate safeguards are not implemented, including the establishment of manual handling procedures, first aid procedures and emergency plans. To prevent these contingencies ERFA will take every reasonable step to safeguard the health and safety of its Staff.

The purpose of this Workplace Health and Safety Policy (WHSP) is to define a group of procedures that ensure the health and safety of ERFA Staff. This policy strives to:

- promote the health, safety and welfare of Staff while working at official ERFA workplaces;
- remove and minimise hazards to prevent accidents and protect Staff from injury;
- adopt a risk management process conducive to the low-risk nature of work activities conducted by ERFA Staff;
- establish the roles and responsibilities, of Staff, the CEO and the specialised position of Workplace Health and Safety Officer (WHSO);
- provide guidelines on how to conduct WHS training for ERFA Staff;
- ensure that ERFA's operations do not place local communities at risk of injury, illness or property damage.

1.1 Scope

This WHSP is applicable to all ERFA Staff, regardless of whether they work at ERFA's Australian or Kenyan branches.

This WHSP is based on the requirements of the Queensland Work Health and Safety Act 2011 (WHS Act) and the Work Health and Safety Regulations 2011 (WHS Regulations). Although the WHS Act and WHS Regulations are only legally binding to Australian Staff, the procedures, because they effectively promote the health and wellbeing of Staff, have also been adopted for Staff in Kenya.

It is the nature of broad legislation catered towards medium to large business needs that that many of the requirements prescribed by the WHS Act 2011 and WHS Regulations are insufficient for a small organisation such as ERFA. Not only is Australian legislation not catered towards the unique needs of not-for-profit organisations such as ERFA, but many of the rigorous requirements are at odds with the practical day-to-day operations of a small workforce. As a result, some requirements have been interpreted for the realities of daily work in a low-risk office environment. For example, the annual assessment that nominated Workplace Health and Safety Officers (WHSOs) are required to perform of their workplace will in most cases be an informal process that does not require the production of a report. The space for flexible interpretation of WHS regulations is itself codified in the WHS Act and the WHS Requirements, in terms such as what is "reasonably practicable."

Necessary interpretations of WHS legislation do not alter ERFA's fundamental commitment to providing a safe and healthy work environment for its Staff. ERFA subscribes to the "#PART&PARCEL – working with small biz; it's in the delivery" campaign of the Australian Chamber of Commerce and Industry (ACCI), which acknowledge that: "The Australian work health and safety regulatory environment is complex and not appropriately scaled to the realities of our small businesses." For more information on ACCI's campaign and for assistance in interpreting WHS legislation for small businesses, please refer to the document "[Enabling Safe and Healthy Workplaces for Small Businesses.](#)"

2.0 Definitions

Throughout this WHSP the statement “reasonably practicable” is used repeatedly. The usage of this clause explicitly draws from the definition as provided in the WHS Act, provided below.

2.1 Reasonably practicable

In the WHS Act ([page 26](#)), **reasonably practicable**, in relation to a duty to ensure health and safety, 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 including— [s 19] Work Health and Safety Act 2011 Part 2 Health and safety duties Current as at 14 September 2020 Page 27 Authorised by the Parliamentary Counsel

- the likelihood of the hazard or the risk concerned occurring; and
- the degree of harm that might result from the hazard or the risk; and
- what the person concerned knows, or ought reasonably to know, about—
 - the hazard or the risk; and
 - ways of eliminating or minimising the risk; and
- the availability and suitability of ways to eliminate or minimise the risk; and
- after assessing the extent of the risk and the available ways of eliminating or minimising the risk, the cost associated with available ways of eliminating or minimising the risk, including whether the cost is grossly disproportionate to the risk.”

2.1 Person conducting a business or undertaking

The WHS Act places the primary duty of care on the **person conducting a business or undertaking** (PCBU). The term PCBU is an umbrella concept used to capture all types of working arrangements or structures whether the person conducts the business or undertaking alone or with others, or whether or not the business or undertaking is conducted for profit or gain. A PCBU can be a company, unincorporated body or association, sole trader or self-employed person.

The PCBU is usually someone such as the director or CEO of a large company down to the owner of a sole trading business. For ERFA, the roles of the PCBU are performed by the CEO.

The following are examples of what do not constitute a business or undertaking:

- a person engaged solely as a worker in, or as an officer of, that business or undertaking;
- an elected member of a local authority (acting in that capacity);
- a wholly ‘volunteer association’ that does not employ anyone (whether incorporated or not).

2.3 Worker

In the WHS Act ([page 23](#)), a person is a **worker** if the person carries out work in any capacity for a person conducting a business or undertaking. The WHS Act’s definition of a **worker** corresponds to ERFA’s definition of **Staff**: Employees, contractors, subcontractors, outworkers, apprentices and trainees, work experience students, volunteers, employers and any other person who performs work for ERFA or ERFK.

2.4 Workplace

In the WHS Act ([page 24](#)), a **workplace** is 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. ERFA has three workplaces, a Brisbane office and a Melbourne office located in Australia as well as a Nairobi office located in Kenya.

ERFA's workplaces are tabulated below:

ERFA Branch	ERFA workplace	Workplace location
Australia (ERFA)	Brisbane	Conference Centre, St Joseph's Nudgee College, Gate 1, 2199 Sandgate Road, Boondall QLD 4033
Australia (ERFA)	Melbourne	126 The Avenue, Parkville VIC 3052
Kenya (ERFK)	Nairobi	Marsabit Plaza, Units 303 & 304, Ngong Road, Nairobi, Kenya

3.0 Roles and responsibilities

This WHSP outlines the roles and responsibilities held by ERFA Staff, the ERFA CEO and the Workplace Health and Safety Officer (WHSO).

3.1 Responsibilities of ERFA Staff

Staff must make themselves aware of WHS as they relate to their workplace and position.

The responsibilities of ERFA Staff are as follows:

- comply with this WHSP;
- take reasonable care of their own health and safety;
- report all workplace injuries and illnesses to their workplace's WHSO by submitting an incident report;
- complete and submit an incident report to their workplace's WHSO concerning any situation that is, or may be, a health or safety hazard;
- be responsible for their own health and safety and for the health and safety of anyone else who may be affected by her acts or omissions at the workplace;
- comply, so far as the worker is reasonably able, with any reasonable instruction relating to health or safety at the workplace that is given by their workplace's WHSO or the CEO;
- adhere to safe work procedures, instructions and rules;
- not willfully or recklessly interfere with or misuse anything provided in the interests of the health and safety of others;
- not willfully place at risk the health and safety of any other person in the workforce;
- inform the supervisor of any personal condition that may increase vulnerability of occupational hazards, e.g., pregnancy, immunocompromised persons or other medical conditions;
- make themselves aware of the provision of First Aid treatment and emergency procedures;
- assist and encourage visitors and contractors to comply with health and safety requirements;
- cooperate with the employer to fulfil all relevant statutory provisions, e.g., preemployment and continuous medical exams.

3.2 Responsibilities of the ERFA CEO (PCBU)

The responsibilities of the ERFA CEO (PCBU) include those of ERFA Staff as well as the following:

- provide and maintain for Staff, as is reasonably practicable, a working environment that is safe and without risks to health;
- identify hazards, assess risk, and implement control strategies to minimise risk of injury to people and property;
- ensure that the relevant WHS Act and WHS Regulations that apply to working conditions and the relevant work environment are observed and enforced;
- encourage consultation in addressing safety issues;
- design, purchase, install and maintain safe equipment and maintain a safe site;
- develop and implement safe systems of work;
- provide adequate safety information, training and supervision to Staff;

- implement formal processes for reporting, recording and investigating potential or actual hazards in both the physical environment and work practices.

The PCBU also holds the following responsibilities in relation to the nomination of the WHSO, as outlined by the WHS Act ([page 92](#)):

- appoint, as a WHSO for that business or undertaking, a person who holds a certificate of authority for appointment as a WHSO;
- or, appoint themselves as a WHSO for that business or undertaking.

3.3 Responsibilities of the WHSO

This WHSP requires that a WHSO be nominated for each of ERFA's workplaces. The WHSO must hold the capacity to regularly inspect in person the workplace for which they are assigned. The WHSO is a position either to be performed by the PCBU or to be nominated by the PCBU. The WHS Act ([page 92](#)) establishes certain functions and powers for WHSOs which include the right to inspect, receive relevant information and be consulted.

If the WHSO is not the person conducting the business or undertaking, their responsibilities are as follows:

- notify the PCBU about WHS matters;
- identify hazards and risks to health and safety arising from the work carried out as part of the conduct of the business or undertaking;
- report, in writing to the PCBU, any hazards and risks identified from the point above;
- immediately notify the PCBU about:
 - any incident the WHSO is aware has occurred at the business or undertaking;
 - any imminent risk to health and safety at the business or undertaking;
- as is reasonably practicable, investigate, or assist in the investigation of, any incidents that occurred at the business or undertaking;
- accompany and assist an inspector during an inspection of the business or undertaking;
- as is reasonably practicable, establish educational and training programs on matters relating to WHS;
- any other function prescribed by regulation.

If the WHSO is the PCBU, their responsibilities are as follows:

- as is reasonably practicable, investigate, or assist in the investigation of, any incidents that occurred at the business or undertaking;
- accompany and assist an inspector during an inspection of the business or undertaking;
- as is reasonably practicable, establish educational and training programs on matters relating to WHS;
- any other function prescribed by regulation.

On an annual basis, the WHSO must:

- carry out an assessment of risks WHS arising from work carried out as part of the conduct of the business or undertaking;
- if the assessment from the above point identifies any risks to health and safety, prepare a report detailing recommendations on how to eliminate or minimise the risks;
- if risk assessment necessitates a written report from the point above, provide a copy of the assessment report to the ERFA Board of Advisors within 30 days of the assessment being carried out.

4.0 Workplace Health and Safety Officer details

Because the WHSO must have the in-person capacity to regularly assess the WHS of their workplace, the CEO is unable to perform the role of WHSO for all of ERFA's workplaces. Rather, they are obliged to nominate a separate WHSO for each of ERFA's workplaces where they are not regularly present. As a result, the CEO performs the role of WHSO for 1 of ERFA's workplaces and nominates the role of WHSO to other ERFA Staff in 2 of ERFA's workplaces. The details of ERFA's WHSOs are detailed below:

ERFA branch	ERFA workplace	Workplace location	WHSO	WHSO Contact details
Australia (ERFA)	Brisbane office	St Joseph's Nudgee College, Gate 1, 2199 Sandgate Road, Boondall QLD 4033	Bren Arkinstall (ERFA CEO)	Phone: 0481 901 911 Email: barkinstall@edmundrice.org
Australia (ERFA)	Melbourne office	126 The Avenue, Parkville VIC 3052	Louise Allison	Phone: 03 8359 0115 0412 580 223 Email: lallison@edmundrice.org
Kenya (ERFK)	Nairobi office	Marsabit Plaza, Units 303 & 304, Ngong Road	Richard Patris Okoth (Africa Development)	Phone: (+254) 725 760 600 Email: ropatris@edmundrice.org

5.0 WHS incident reporting process

If a WHS incident has occurred or if a situation has been observed that is, or may be, a health or safety hazard, involved Staff are required to follow reporting procedures. At least one Staff member is to complete an incident report and submit it to their workplace's nominated WHSO as soon as possible. Staff are to submit their incident report using the email address of their workplace's WHSO, tabulated in Section 4.0 above.

An incident report should contain the following information:

- a description of the WHS incident, or a description of unsafe work conditions;
- the date the incident occurred, or the date unsafe or unhealthy workplace conditions were first observed;
- the parties involved;
- as is practically reasonable, suggestions for how to prevent similar WHS incidents from occurring, or to ameliorate the observed unsafe or unhealthy situation;
- any other relevant information.

6.0 WHS incident handling process

If a WHS incident report has been submitted, it is to the responsibility of the relevant WHSO to handle the case. The first step is to assess whether the WHS incident report concerns a credible WHS incident or risk. If the WHSO deems that the incident report is not credible, they reserve the right to dismiss the case. In this event they must inform the person who submitted the WHS incident report (See Section 7.0). If the WHS incident report is deemed credible the WHSO is to complete the following steps:

- ensure the immediate wellbeing and safety of Staff, including that they receive medical attention;
- if reasonably practicable, immediately ameliorate any situation that poses or posed a WHS risk;
- after these first 2 conditions have been met, forward the incident report to the CEO and provide any relevant clarifying information;
- conduct further analysis of the incident or situation that poses a WHS risk;
- as is reasonably practicable, remove hazards to prevent accidents and protect Staff from

- injury;
- if not possible to remove hazards, as is reasonably practicable, minimise hazards to prevent accidents and protect Staff from injury.

As part of the analysis process, the WHSO should seek to ascertain the following information:

- whether the hazard or risk can be isolated;
- the number and location of staff affected by it;
- whether appropriate temporary measures are possible or desirable;
- whether environmental monitoring is desirable;
- the time that may elapse before the hazard or risk is permanently corrected;
- who is responsible for ensuring the removal of the hazard or risk.

7.0 WHS incident finalising process

As soon as possible after the resolution of an issue, the relevant WHSO will inform the person(s) who initially raised the issue, and if relevant, all staff, details of the resolution.

The WHSO is also required to inform the person(s) who raised the issue if their submitted incident report was dismissed as not concerning a credible WHS risk.

If a Staff member is dissatisfied with the outcome or the resolution, they may make a request for the resolution to be reviewed. If the outcome of the review is to uphold the initial resolution then that decision is final. If a Staff member still believes that the final decision is inappropriate they may contact the following external organisations to escalate the issue depending on the location of their workplace.

ERFA workplace	External organisation	Contact details
Brisbane office	WorkSafe Queensland	phone: 1300 362 128
Melbourne office	WorkSafe Victoria	phone: 1800 136 089
Kenya office	Ministry of Labour and Social Protection Directorate of Occupational Safety & Health Services (DOSHS)	Safety House; Commercial street, Industrial area; P.O Box 34120 – 00100, Nairobi; email: doshdept@yahoo.com , email: doshdept@labour.go.ke ; phone: 020 266 772, 0775 833 675

8.0 Training

The purpose of WHS training is to help all ERFA staff acquire the necessary skills for WHS procedures and knowledge of their roles and responsibilities. WHS training needs to be integrated into the overall training plan of the organisation. WHS training will be conducted as is reasonably possible.

9.0 Manual handling procedures

Manual handling covers a wide range of activities including lifting, pushing, pulling, holding, throwing and carrying. It includes repetitive tasks such as packing, typing, assembling, cleaning and sorting, using hand tools and operating machinery and equipment. The purpose of implementing manual handling procedures in the workplace is to reduce the incidence of musculoskeletal disorders (MSDs). MSDs are defined as an injury, illness or disease that arises in whole or in part from manual handling in the workplace, whether occurring suddenly or over a prolonged period of time.

9.1 Process for reducing manual handling hazards in the workplace

Identify hazardous manual handling. This could include any behaviour involving:

- repetitive or sustained application of force;
- repetitive or sustained awkward posture;
- repetitive or sustained movement;
- application of high force.

Assess the risk of the behaviour by analysing the following components

- movements;
- forces;
- duration and frequency;
- environmental factors.

Control, eliminate or reduce the risk of MSD by taking any of the following precautions:

- alter the workplace or environmental conditions;
- alter the systems of work;
- change the objects used;
- use mechanical aids;
- provide information, training and instruction (if the above are not practicable).

10.0 First aid procedures

Despite the best efforts to prevent accidents, injuries may occur. ERFA is committed to ensuring that appropriate first aid is provided to any person who is injured or becomes ill at an ERFA workplace (see WHS Principles Part 3.2 General Workplace Management).

10.1 Roles and responsibilities:

According to WHS Regulations ([page 62](#)) The ERFA CEO (PCBU) must ensure:

- the provision of first aid equipment for each ERFA workplace;
- that all Staff at an ERFA workplace have access to first aid equipment;
- access to facilities for the administration of first aid;
- that an adequate number of workers are trained to administer first aid at the workplace;
- they are aware of (i) the nature of the work being carried out at the workplace, (ii) the nature of the hazards at the workplace, (iii) the size and location of the workplace and (iv) the number and composition of the workers and other persons at the workplace.

A First Aid Officer (FAO) should be designated for each of ERFA's workplaces. For ERFA, this means one FAO for the Brisbane, Melbourne and Nairobi offices.

The responsibilities of FAOs are as follows:

- provide first aid as required;
- arrange prompt and appropriate referral to external emergency services (for example, an ambulance) or medical professionals in cases where the needs assessment exceeds the first aid officer's training;
- liaise as appropriate with external emergency services (for example, paramedics or ambulance personnel) and provide information regarding the current situation, assessed needs and first aid administered;
- ensure that first aid kits are fully serviceable and stocked;
- conduct regular checks of stock levels and ensure that no unauthorised stock (for example, medication, including headache preparations, creams, lotions or other products whose sterility cannot be maintained) is stored in the kits.

10.2 Implementation plan

All ERFA Staff are to be informed about first aid equipment and facilities. Information will be communicated both via verbal and visual methods. Information about first aid facilities, roles and responsibilities will be provided to Staff on the commencement of their employment. Changes regarding first aid procedures will be communicated to all Staff.

11.0 Return to work/rehabilitation procedures

ERFA is committed to the philosophy and practice of occupational rehabilitation. Providing a safe, early return to meaningful and productive work is in the best interest of all staff. ERFA encourages full and active participation from all Staff members in creating a supportive environment conducive to the rehabilitation process and return of colleagues to the workplace.

ERFA has established the following objectives:

- return to work should be a normal expectation of all employees following a work-related injury. Return should be as soon as possible after the injury consistent with medical advice;
- treatment, return to work activities and any occupational rehabilitation services will commence for Staff immediately, or, as soon as necessary, to ensure their earliest possible return to pre-injury employment;
- each Staff member's occupational rehabilitation program will be developed individually, and on a confidential basis, with the employees concerned;
- an injured Staff member requiring an occupational rehabilitation service may be provided with a choice of approved occupational rehabilitation providers by a nominated Return to Work Coordinator or Workcover authorised agent;
- suitable employment conditions, consistent with medical opinion, are made available to the injured Staff member;
- an Return to Work Plan is prepared for a Staff member who has been incapacitated from work;
- return to work plans are to be established no later than 10 days after the day of incident;
- Staff members will be consulted regarding the continuous development of ERFA's return to work/rehabilitation procedures where appropriate.