



Policy – Work Health & Safety (WHS) (AUS)

Navitas Limited
ACN 109 613 309

Document

Document I.D.	GHR-04-04P
Responsibility	Group General Manager Human Resources
Initial Issue Date	June 2011

Version Control

Issue Date:	Summary of Changes	Review Date
June 2011	Initial	June 2013
March 2012	Update to reflect changes coming from harmonisation of WHS legislation	March, 2013

PURPOSE AND SCOPE

- 4.04.1** The health and safety of its employees, students, contractors and visitors is of paramount importance to Navitas. The purpose of this policy and procedure is to establish and maintain health and safety of employees and workplaces by:
- a)** protecting employees and other persons against harm to their health, safety and welfare through the elimination or minimisation of risks arising from work,
 - b)** providing for fair and effective workplace representation, consultation, co-operation and issue resolution in relation to work health and safety,
 - c)** promoting the provision of advice, information, education and training in relation to work health and safety, and
 - d)** providing a framework for continuous improvement.
- 4.04.2** This Policy applies to all employees of the Navitas Group in Australia and should be read in conjunction with other OHS/WHS policies to comply with legislative requirements in the jurisdictions in which the business operates. It does not form part of any employee's contract of employment.
- 4.04.3** While this document sets out the WHS requirements under Australian law, offshore business units may use this policy and procedure as a reference guide to supplement their efforts in providing and maintaining a safe workplace in accordance with local legislation, particularly where businesses are operating in jurisdictions with little or no legislative requirements in place.

POLICY

- 4.04.4** Navitas is committed to providing a work environment and systems of work which comply with all relevant Acts and Regulations governing health and safety. It is the intention of Navitas to ensure, so far as is reasonably practical, that all employees, students, contractors and visitors are safe from injury and risks to health while at the workplace and/or while undertaking work-related activities.
- 4.04.5** Navitas is also committed to injury management aimed at the early, safe and sustained return to work of injured employees.
- 4.04.6** Navitas will meet these commitments by regularly consulting with employees and their representatives, and suppliers of equipment and services. Further, Navitas will ensure that responsibilities are appropriately defined and that employees receive the information, training, resources and supervision they require, to competently carry out their responsibilities.
- 4.04.7** This will be facilitated by the ongoing implementation and continual improvement of Navitas WHS management systems developed in consultation with the Navitas community and integrated into all Navitas activities.
- 4.04.8** Navitas will take all reasonable care to
- implement and maintain safe systems of work;
 - undertake risk management activities to identify, eliminate and/or manage risks in the work place;

provide and maintain safe systems for the use, handling, storage and transportation of plant, equipment and hazardous substances;

consult with employees to enhance the effectiveness of this Policy.

provide appropriate WHS training, information, instruction and supervision for all employees and students;

provide adequate resources, including finances, to facilitate the company's WHS responsibilities;

comply with WHS Legislation, Regulations and relevant Australian Standards.

- 4.04.9** Navitas will commit the resources required to enable Navitas corporate and Divisions to implement this Policy in order to achieve the WHS statutory and regulatory obligations.

WHS CONSULTATION ARRANGEMENTS

- 4.04.10** Navitas is committed to a meaningful and effective consultative approach to WHS management. Navitas will consult with employees in implementing safety practices and systems that will ensure the health, safety and welfare of all employees.

- 4.04.11** Each Division will determine and document the appropriate consultation methods through which to consult with employees regarding WHS policy and procedures.

- 4.04.12** A Group Navitas Work Health and Safety Committee, including representation from management and each of the Divisions, and supported by a Group Human Resources officer, will report to the Board and will be responsible for

setting the strategic direction for WHS across Group Navitas;

oversighting the implementation of the various legislative requirements across the Navitas Group, as appropriate;

ensuring the implementation of WHS initiatives within each Division;

keeping the Board members aware of their obligations under the legislation and advising them of any important WHS issues across the Navitas Group; and

determination of any escalated Work Health and Safety issues across Navitas in terms of dealing with WHS matters which have broader implications than the Divisional level.

RISK ASSESSMENT and HAZARD IDENTIFICATION

- 4.04.13** Planning for the identification of hazards, assessing risks, controlling risks and reviewing control measures is an essential part of work health and safety management

- 4.04.14** Ongoing comprehensive hazard identification and risk assessments will be undertaken for all Navitas operations, including offices and campuses.

- 4.04.15** Hazard identification, risk assessment and elimination and control implementation should be done at the planning stage of each project/activity so that

any foreseeable hazards that may arise in the workplace can be identified;

the risk of harm arising from identified hazards can be assessed;

hazards can be eliminated where possible, or if this is not reasonably practicable, safety controls can be implemented to reduce the risk to as low as reasonably practicable; and

the effectiveness and efficiency of controls can be monitored and reviewed.

- 4.04.16** WHS inspections of each work area will be conducted on a quarterly basis and Reports submitted to the Group Navitas Work Health and Safety Committee. It will be up to each Divisional/corporate area to determine the most appropriate means of conducting those inspections, in line with their respective consultation arrangements.

TRAINING and INDUCTION

- 4.04.17** All new employees and contractors will undertake Navitas and/or BU specific orientation training prior to starting work. A record of the induction should be kept.
- 4.04.18** All visitors, volunteers, work experience students and any other person in the workplace not already with employee or contractor status must be under the direct supervision and responsibility of an employee at all times.
- 4.04.19** All WHS Committee members and WHS Representatives must be provided with specific training as set out in the applicable legislation and regulatory requirements pertinent to their location.
- 4.04.20** All Managers will receive additional training on their responsibilities under this policy.
- 4.04.21** Group HR representatives will work with their respective business units to ensure that the above training and induction is actioned.

UNION RIGHT OF ENTRY

- 4.04.22** To enter a workplace, a union official must be a WHS entry permit holder and must be representing an employee who is eligible to be a member of that union. Upon such request, Managers should sight the union official's permit and photo ID prior to allowing them to enter the workplace. Unless there is good reason, a union official permit holder who is entitled to enter cannot be refused or delayed entry.
- 4.04.23** Managers should advise their Business Unit Head who will advise Group Human Resources of any such requests.

RESPONSIBILITIES

- 4.04.24** The **Navitas Board** has ultimate responsibility for the Company's WHS performance, and in particular in providing leadership, support, direction and resources to ensure that the Company meets its commitments to Work Health and Safety.
- 4.04.25** **Members of the GLT, Heads of Divisions, Directors and Managers and other Supervisors** in charge of "places of work" will drive the Navitas WHS policy into the workplaces for which they are responsible. They will ensure that the workplace, its plant and equipment are maintained in a condition that effectively controls health and safety risks. They will also ensure that employees, students and visitors are provided with the adequate information, instruction, supervision and training required to promote a healthy and safe environment.
- 4.04.26** In particular, **Heads of Business Units** are responsible for ensuring that their area of responsibility complies with relevant WHS legislation, regulations and standards and their work area(s) are without risk to health and safety of employees and students;

safe systems of work are implemented and used;
appropriate resources are made available to meet the Company's WHS responsibilities;
WHS issues are addressed as they arise;
all hazards and incidents are reported in accordance with legislative requirements and that corrective actions are implemented in a timely manner
all employees, contractors and visitors are aware of this policy and procedure and their responsibilities defined herein, and adhere to all safe work procedures;
WHS consultative & communication mechanisms are established as required; and
all employees have undertaken the required WHS induction training as required.

4.04.27 Employees are responsible for

adhering to all WHS policies and procedures and cooperating with their supervisors in the implementation of the Navitas WHS Management Systems and in other WHS matters in general;
ensuring that their work area is without risk to the health and safety of themselves and others;
completing their work in the safest manner possible and performing their activities in a manner that does not risk harm to themselves or others;
promptly reporting to their supervisor any workplace accidents, incidents and/or hazards; and
completing all training in WHS as required.

4.04.28 Employees with specific teaching responsibilities must ensure that WHS is also incorporated into their teaching activities. This includes such activities as

undertaking risk assessments on all field trips and excursions prior to commencement of these activities;
ensuring their work area(s) are without risk to health and safety of students;
ensuring that students are provided with and adhere to all WHS policies & safe work procedures; and
ensuring that all hazards and incidents are reported in accordance with legislative requirements and that corrective actions are implemented in a timely manner.

4.04.29 Employee involvement directed at the improvement of Navitas WHS Management Systems or other matters relating to health and safety in general is strongly encouraged.

4.04.30 Students are responsible for following directions from their teachers on WHS issues, working in as safe a manner as possible; complying with company WHS policy & procedures and reporting any hazards, risks or incidents as they are identified.

4.04.31 Contractors while at Navitas will comply with all applicable legislation and regulatory requirements and with the Navitas WHS policies and procedures; and are responsible for taking reasonable care whilst on Navitas property and cooperating with actions taken to protect, the health and safety of themselves and others.

- 4.04.32** **Visitors** are required to comply with all Navitas policies while at Navitas and should report all accidents and incidents to the relevant employee contact or manager, Security or Property as soon as possible; and in the event of an emergency must follow the emergency evacuation procedures.
- 4.04.33** The Group General Manager, **Human Resources** is accountable for the ongoing development, approval, implementation, awareness and effectiveness of this Policy and the supporting processes and documentation and for ensuring that all relevant managers are made aware of this policy and procedure.

DEFINITIONS

<i>Business Unit Manager</i>	Group Manager and/or Business Unit Head of the relevant legal entity (as appropriate to that Division)
<i>Company</i>	Navitas Limited ACN 109 613 309 having its registered office at Level 2, Kirin Centre, 15 Ogilvie Road, Mt Pleasant WA 6153
<i>Employee</i>	A person who carries out work in any capacity for the Navitas Group
<i>GLT</i>	The Group Leadership Team of the Company
<i>Group</i>	The Company and its subsidiaries
<i>Hazard</i>	A source or situation with a potential for harm in terms of human injury or ill health, damage to property, damage to the environment, or a combination of these
<i>Hazard Identification</i>	The process of recognising that a hazard exists & defining its characteristics
<i>Officer</i>	An officer within the meaning of section 9 of the Corporations Act 2001 of the Commonwealth other than a partner in a partnership
<i>Risk</i>	The likelihood of a hazard causing harm and how serious it could be
<i>Risk Assessment</i>	The overall process of estimating the magnitude of risk and deciding whether the risk is tolerable or manageable
<i>Workplace</i>	A place where work is carried out for a business or undertaking and includes any place where a employee goes, or is likely to be, while at work
<i>Work-related activities</i>	This would include any activity related to or emanating from the workplace, e.g. excursions, social events, professional development activities, etc.

REVIEW

This Policy is reviewed bi-annually by Group Human Resources to ensure alignment to appropriate strategic direction and its continued relevance to Navitas' current and planned operations.

RECORDS

All records in relation to this policy will be managed as follows:

Record type	Responsible	Location	Retention
Approved Navitas Group OH&S Policy	Group Human Resources	Navitas Infonet	Ongoing

REFERENCE DOCUMENTS

Model WHS Legislation

<http://safeworkaustralia.gov.au/Pages/default.aspx>

Model Work Health and Safety Act 2011
Model Work Health and Safety Regulations
Code of Practice

New South Wales Work Health and Safety - WorkCover NSW

www.workcover.nsw.gov.au

Work Health and Safety Act 2011
Work Health and Safety Regulation
Codes of Practice

Northern Territory Work Health and Safety Authorities – NT WorkSafe

www.worksafe.nt.gov.au

The Work Health and Safety (National Uniform Legislation) Bill 2011 (NT)

Queensland Work Health and Safety Authorities

www.worksafe.qld.gov.au

Queensland Work Health and Safety Act 2011 (WHS Act)
Work Health and Safety Regulation 2011

South Australian Work Health and Safety Authorities – SafeWork SA

www.safework.sa.gov.au

Work Health and Safety Bill 2011 (SA)
Model Work Health and Safety Act

Victorian Work Health and Safety Authorities – WorkSafe Victoria

www.worksafe.vic.gov.au

Occupational Health and Safety Act 2004 (the Act)
Occupational Health and Safety Regulations 2007

Western Australian Work Health and Safety Authorities – WorkSafe WA

www.worksafe.wa.gov.au

Occupational Safety and Health Act 1984
Occupational Safety and Health Regulations 1996