

# Health Safety and Wellbeing Management System Framework

## Purpose

Ahpra is committed to providing and maintaining a physical and psychologically safe and healthy workplace in consultation with workers. The Ahpra Health, Safety and Wellbeing Management System (HSWMS) Framework outlines a structured approach to enable this, and ensures we meet all our ethical, legislative, and regulatory obligations. Ahpra recognises that by prioritising and embedding health, safety and wellbeing into the way we work, significant benefits can be achieved including better business performance, stronger legislative compliance and enhanced social impacts.

This document provides an overview of the key elements that make up the Ahpra HSWMS.

## Scope

The HSWMS applies to all Ahpra workers and others affected by the work Ahpra undertakes. A worker is defined as a person who carries out work in any capacity for Ahpra including members of the Ahpra Board and National Executive, employees, contractors, agency staff, volunteers, interns, work experience staff and statutory employees (board, committee and panel members).

## Part 1 – context and overview

### Context

Ahpra's HSWMS Framework seeks to align to the ISO 45001, *Occupational health and safety management systems – Requirements with guidance for use* Standard (the Standard). As Australia and New Zealand have adopted this International Standard, it is also known (here) as AS/NZS ISO 45001. Additionally, consideration has been given to ISO45003 Occupational health and safety management psychological health and safety at work which provides guidelines for managing psychosocial risks. At this stage, Ahpra is not seeking certification against this standard.

This is the primary standard relevant to all organisations, regardless of size, industry or nature of business and provides general guidance on how to implement, develop and continuously improve health and safety performance.

The Standard outlines a systematic management approach that can assist in meeting legal and regulatory requirements and lead to sustained improvement in health, safety and wellbeing performance. A number of benefits are derived from aligning to the Standard including creation of a health and safety culture, whereby workers are encouraged to take an active role in their own health, safety, and wellbeing; reduction in workplace incidents; reduced absenteeism and staff turnover leading to increased productivity; reduced cost of insurance premiums; ability to meet legal and regulatory requirements; and improved staff morale.

It should be noted that Ahpra utilises the contemporary term Health, Safety and Wellbeing (HSW) to emphasise its commitment to ensuring the health and wellbeing of workers and other persons in addition to their safety, as well as traditional Work, Health, and Safety (WHS), Occupational Health and Safety (OHS) and Occupational Safety and Health (OSH) responsibilities as described in each Australian State and Territory's legislation.

Australian Health Practitioner Regulation Agency  
National Boards

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## Overview of the Health Safety and Wellbeing Management System Framework

Diagram 1: Health Safety and Wellbeing Management System Framework



The above diagram represents an overview of the HSWMS and provides a broad summary of the Framework. The following have been identified as key elements within the framework:

1. Context
2. Leadership
3. Planning
4. Support
5. Operation
6. Performance Evaluation
7. Improvement

This HSWMS will be reviewed every three years or sooner if required.

### Documentation

Supporting documentation such as policies, procedures, plans, guidelines, and forms are grouped together around each of the above key elements. Each HSW document has a specific reference number and the complete hierarchy of supporting documentation is summarised in Appendix 1. The hierarchy of documents aligns to the [Policy Framework](#) and is organised in the following order:

- Legislation
- Statutory policy
- Governance policy
- Management or operational policy
- Procedures
- Support materials such as forms, guides, and checklists etc

## Part 2 – Leadership

### Introduction

The HSWMS reconfirms the continued commitment of Ahpra and its Officers to the provision of a physically and psychologically safe working environment for all Ahpra workers and others affected by the work that Ahpra undertakes.

Whilst all workers at Ahpra are expected to actively participate in making Ahpra a safe and healthy place to work, it is acknowledged that managers play a key role in the prevention of work-related injury and ill-health as well as the provision of work that is designed with health, safety, and wellbeing in mind. Managers can do this by seeking feedback and participation in HSW matters from workers and by actively encouraging workers to report health, safety and wellbeing incidents, hazards, risks, and opportunities.

Committees, groups, and individuals have different responsibilities and levels of duty of care, depending on the role(s) or position(s) they hold. Whilst all Ahpra employees have HSW duties embedded as an inherent requirement of their role, the *HSW Responsibilities guideline (HSW010)* provides further detail.

## 2.1 Leadership awareness and commitment

This HSWMS is evidence of the commitment to the provision of a physically and psychologically safe working environment.

Training is provided to Officers at least annually, to ensure a thorough understanding of relevant HSW legislation and their obligations.

## 2.2 HSW and Risk Management Governance

Governance is the act of ensuring behaviour or performance in accordance with the rules by which an entity is controlled.

In relation to the HSWMS, governance is the structure and oversight established to ensure that the expectations of the HSWMS are delivered in an effective manner and help provide assurance to the Officers.

The ultimate accountability for health, safety and wellbeing lies with Ahpra as the Person in Control of the Business or Undertaking (PCBU which comprises of the National Executive and Ahpra Board members), Employer or Responsible Person (in Victoria) and those who have significant decision-making abilities and financial control over the PCBU (Officers).

With respect to oversight of activity associated with the HSWMS this is aided by:

- the Ahpra Board, which is the governing board for Ahpra
- the Finance, Audit and Risk Management Committee<sup>1</sup> that reviews, recommends, and monitors health, safety and wellbeing internal audits
- the National Executive via quarterly commentary and monthly metrics reports and
- the People and Remuneration Committee<sup>2</sup> that oversees HSW; reports any HSW legislative breaches; and reviews quarterly HSW reports and advises the Ahpra Board on the effectiveness of Ahpra's HSW performance.

The terms of reference and the composition of both committees of review can be located on the Ahpra website.

## 2.3 Roles and Responsibilities

Ahpra sets out the individual roles and responsibilities in relation to health and safety in the *HSW responsibilities guideline (HSW010)*.

Ahpra is committed to ensuring the health, safety and wellbeing of its workers and others affected by the work Ahpra undertakes. To facilitate this commitment, Ahpra expects that all workers will undertake their duties in a manner which always considers the health, safety and wellbeing of themselves and others.

Ahpra and its workers will comply with all applicable legislative instruments describing its HSW responsibilities and recognises the responsibility of all workers to take reasonable care to protect the physical and psychological health, safety and wellbeing of themselves and others while engaging in their work.

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<sup>1</sup> <https://www.ahpra.gov.au/About-Ahpra/Who-We-Are/Agency-Management-Committee/Finance-Audit-and-Risk-Committee.aspx>

<sup>2</sup> <https://www.ahpra.gov.au/About-Ahpra/Who-We-Are/Agency-Management-Committee/People-and-remuneration-committee.aspx>

## 2.4 Resources

Ahpra and its Officers seek to ensure that adequate resources are allocated to meet the needs of the development, implementation, maintenance, and continuous improvement of the HSWMS.

### *People*

A dedicated HSW Team has been established to help facilitate and manage the HSW function across Ahpra. This team works closely with the Risk & Resilience team to ensure that a risk-based approach to managing health, safety and wellbeing is taken throughout Ahpra.

The Enterprise Agreement provides an allowance for employees agreeing to be appointed to perform first aid or emergency warden duties, in addition to their normal duties. First aid and emergency wardens are provided in each Ahpra office. Ahpra provides the training, and time to attend training, and maintains a register of all current wardens. First aid and emergency wardens are obliged to ensure their training is current and does not lapse during their appointment period and that they attend the office on their designated days.

A National HSW committee and a local HSW committee in each jurisdiction have been established. The Terms of Reference outlining responsibilities and membership can be found on the Intranet, [here](#). Committees are made up of peer-elected members from different operational areas of each office and must meet a minimum of 4 times a year. They are responsible for publishing their decisions and actions on the Intranet so they are easily accessible to all staff.

Where health and safety representatives are elected they are invited to join their local HSW Committee.

Ahpra ensures workers are afforded adequate time to participate in HSW learning and development opportunities. Additionally, access to clear, understandable, and relevant information about HSW matters is provided. Ahpra encourages workers to consider including HSW learning and development objectives in their annual performance plans.

### *Process / systems*

The HSW Team maintains the [Health, Safety and Wellbeing Hub](#) on the Intranet. The Intranet includes useful information and resources for workers, including policies and procedures, information about Ahpra's Employee Assistance Program, and learning and development opportunities. Ahpra mandates training on certain HSW topics and monitors to ensure compliance. Information for board and committee members can be found on Diligent Boards.

Ahpra operates a hybrid working environment that allows workers to work from home up to three (3) days per week, providing that they have a suitable and safe ergonomic working home office environment. To ensure that this is the case, workers are required to complete an ergonomic self-assessment and a Working from home check annually with a 6-month check-in. Ahpra requires workers to provide photographs of their home workstation to ensure that it is adequate. Managers are required to ensure these are completed.

Ahpra has introduced an enterprise health and safety solution, SAI360 known as 'Log It', that is a central solution allowing workers to report hazards, near-misses, and incidents; undertake working from home checklists and ergonomic self-assessments. The system also allows for incident investigations, office inspections, HSW meeting documentation and workers compensation claims and injury management processes.

Ahpra is committed to identifying, assessing and monitoring psychosocial hazards and is planning to undertake an enterprise-wide psychosocial risk assessment to achieve this. The assessment will assist in the development of an action plan to address and monitor the identified hazards in consultation with stakeholders, including workers.

Ahpra has an internal auditor and Quality Assurance team responsible for conducting audits in accordance with the agreed audit schedule and scope set by the Ahpra Board. Any findings / outcomes from HSW audits conducted, are reported through the appropriate governance arrangements, then

monitored to ensure corrective action is achieved. All documented information as evidence of completion against those findings / outcomes is retained by the internal auditor or Quality Assurance team.

Ahpra's Corporate Legal team conducts an annual compliance review against all applicable corporate legislative and regulatory requirements and liaises with the HSW team for checks against those requirements. Ahpra undertakes regular training to ensure Officers are informed of any legislative or regulatory requirements.

### *Financial*

Ahpra allocates an annual budget for the maintenance and continual improvement of health, safety and wellbeing in Ahpra.

## **Part 3 – Planning**

### **Introduction**

To deliver against strategic objectives, a broad range of processes and systems are required. Ahpra has a comprehensive platform of systems and processes linking the higher level strategic and business plans and risks to specific operational outcomes. It achieves this through the active engagement of key stakeholders and the implementation of policies, procedures and specific implementation plans to support each improvement initiative and to ensure the delivery of the business objectives on time and to the required standard.

Ahpra and its Officers have clearly articulated the necessary policy direction to ensure compliance with all legislative and regulatory obligations. In addition, HSW objectives, targets and KPIs have been identified to ensure the effective measurement and reporting of performance. A comprehensive HSW Plan sets out the improvement program for the next two years. This is monitored regularly to ensure it is responsive to emerging priorities.

### **3.1 Legal and Compliance**

It is recognised that there have been, and is likely to be more, significant changes to the legislative landscape. The current legislative environment is available on the [SafeWork Australia website](#) and includes any amendments as made from time to time.

Each state and territory also have a set of Regulations to support the legislation which must also be complied with by Ahpra in each jurisdiction.

Although Victoria has not yet enacted the model law, it is noted that the basic concepts under these laws are the same as those in the model WHS law. Despite not having a positive duty to exercise due diligence to ensure the business or undertaking acts in compliance with the health and safety laws obligations in Victoria, as is the case in the Model Law jurisdictions, Ahpra and its Officers strive to take proactive steps in order to discharge their duty to exercise reasonable care.

A number of codes of practice have been developed under the model law. Practices or procedures developed for and included in this HSWMS have been aligned with those codes of practice.

Any amendments to health and safety legislation or relevant regulations will be provided in accordance with the HSW and risk management governance arrangements included above.

### **3.2 Objectives, Targets and KPIs**

Ahpra is striving to make HSW an integral part of decision making in all operations. Decision making relies on data and information. Ahpra recognises that a culture where workers feel safe and supported when reporting incidents, hazards and risks is imperative.

Ahpra sets and reviews targets, where appropriate with a view to continuously improve HSW performance.

Measurement of performance is based on key lag and lead indicators. See Section 6 for more information.

Performance targets are set at a national level and specific to individual workplaces or as part of individual performance development plans (PDP).

National level targets will be included in the HSW Annual Plan, where appropriate.

### **3.3 HSW Plan**

The HSW plan is the business plan for HSW in relation to the development, implementation, and ongoing maintenance of the HSWMS taking into consideration the current resourcing levels of the HSW Team. The plan is reviewed regularly with our workers as new priorities arise and budgets are allocated.

The purpose of this plan is to set direction and to focus on the higher risk activities that could lead to injury or illness within Ahpra. The priority risk areas together with the priority improvement programs are identified through a risk assessment process conducted at the beginning of the year with ongoing reviews.

The document represents the strategic focus for Ahpra. A wide range of lower-level priorities are also considered and effectively addressed as and when required to maintain a safe working environment.

The HSW plan is included in reports in accordance with the outlined governance arrangements and can be located on the Intranet.

### **3.4 HSW risk management**

In simple terms risk management involves thinking about what could happen if someone is exposed to a hazard and how likely it is to happen. Risk management should be used for both physical risks and psychological risks in the workplace. Psychological risks are risks to someone's psychological health (mental health).

Managing HSW risks involves the following steps:

1. Identify hazards
2. Assess risks
3. Control risks
4. Review control measures

Whilst the aim is always to eliminate risks it is acknowledged that this may not always be possible. In these instances, the approach is to minimise risks so far as is reasonably practicable by implementing effective control measures. Regular review to ensure that these measures continue to be effective is an essential part of the process.

At each step consultation with workers and their health and safety representatives must be undertaken.

Our HSW Incident Management System, Log It assists with identifying hazards along with other lead indicators, including HSW Committee inspections and audits.

#### **3.4.1 HSW Alignment with Enterprise Risk Management Framework**

The HSW Team and the Risk and Resilience Team work collaboratively to ensure the HSWMS is fully integrated within the Risk Management Framework. The Risk Management Policy together with the Risk Management Plan and Risk Appetite Statement provide a comprehensive framework within which the HSWMS is located. The HSWMS shares the same governance structure and reporting arrangements as set out in Figure 2 - Part 4.2 of the Risk Management Framework.

The Risk Management Plan ensures that all risks are identified, recorded in a comprehensive risk register; assessed and controlled to minimise the possibility of harm to employees, key stakeholders, and members of the public.

The Risk Management Plan provides the framework for the proactive management of all business risks including WHS risks. The HSWMS and the Risk Management Framework include:

- Establishing risk context
- Risk identification
- Risk assessment
- Risk mitigation

**Note:** It is not proposed to replicate the risk management documents within this system. For further information see the Risk Management Policy, Risk Management Framework, Risk Management Plan and Risk Appetite Statement available on the Ahpra intranet. Tools to assist in conducting a risk assessment are also available on the site.

### 3.5 Planning for emergencies

Each office has the following procedures and equipment in place to ensure that emergency situations are responded to and managed appropriately:

- A site plan displayed and accessible to all persons on-site
- Evacuation procedures and clearly marked assembly points
- Alert/warning alarms or systems
- Emergency exits well-lit and clear of obstructions
- Fire-fighting equipment that is accessible and in working order
- Trained emergency wardens to support emergency evacuation
- Procedures for individuals requiring assistance with emergency evacuation
- Trained first aid personnel and first aid equipment
- Current safety data sheets available for all chemicals accessible
- Emergency arrangements are covered in site inductions for new workers

Ahpra's emergency management organisation is integrated into the emergency management plan of each of the offices which it occupies. Emergency Management Plans (EMP) are in place and are practised regularly. Building management undertake emergency evacuations regularly in accordance with AS3745 - 2002 Emergency Control Organisations that are established at every Ahpra location.

The Business Continuity Framework is managed by the Corporate Risk & Resilience Team and provides guidance on how to respond to any significant incidents that interrupt business operations. The Enterprise Continuity Plan is divided into function-based plans and facility-based plans. Either plan could be activated in response to a HSW incident.

#### 3.5.1 Emergency Plan

Each jurisdiction has an emergency plan in place which can be found on the office intranet page or displayed on the HSW noticeboard. The plan outlines the key requirements of an emergency response and was developed in consultation with workers and other key stakeholders such as Facilities Representatives, HSW Committee members, Building Manager, and other tenants, where appropriate.

Whilst everyone has a role to play in managing emergencies the State and Territory Manager is responsible overall to ensure that the processes in place are adequate for the location.

The types of likely emergency events have been considered for each jurisdiction and cover the following as a minimum:

1. Fire
2. Bomb threats
3. Electrical outages
4. Security breaches
5. Injuries/medical events
6. Worker diagnosed with COVID-19
7. Adverse weather

Consideration has been given to the hybrid working environment to ensure that adequate coverage for emergency wardens and first aid officers has been considered.

Elements of the emergency plan are tested at least twice per year at all Ahpra workplaces. As a minimum this will include an annual evacuation drill and training for emergency wardens.

Ahpra management recognise the need to cooperate fully with the emergency procedures established by the building owners and/or other tenants, and requires all workers, stakeholders, contractors, and visitors to participate in all emergency management evacuations and drills.

### **3.5.2 First Aid**

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. Ahpra ensures the provision of a prompt, coordinated first aid response in order to meet and/or exceed the requirements in the SafeWork Australia Model Code of Practice: First Aid in the Workplace. To achieve this each Ahpra office provides the following:

- First aid kits and a first aid room
- Automated External Defibrillator (AED)
- Posters identifying location and contact details for First Aid Officers (FAO)
- Annual audit and maintenance of the first aid kits and defibrillator by an external provider
- Regular audit of contents of kits by FAOs
- Records of all treatment, injuries and illnesses

FAOs receive adequate training from a registered training organisation in line with the requirements outlined by SafeWork Australia. FAOs are required to attend the office on their designated days.

An assessment of the first aid requirements of each jurisdiction has been undertaken and, due to the nature of the work being completed and the size and location of the offices the risk of injury was deemed to be low for all jurisdictions. Ongoing monitoring of incident and hazard data ensures that the first aid provision reflects the needs of the business.

The provision of first aid facilities and any alternative arrangements is outlined in each jurisdiction's Emergency Plan. There are also signs displayed in each office identifying the location of the first aid kits, first aid room and Automated External Defibrillator. First aid arrangements is covered as part of local and corporate inductions.



## Part 4 – Support

### Introduction

In order to ensure the health, safety, and wellbeing of all workers it is important that a framework of support, developed in consultation with workers, is in place and is effective. There are essentially three levels of support, namely:

- organisational e.g., through policies, procedures, good work design and training
- team support e.g., through leadership, teamwork, and reflective practice coaches; use of 1:1 and Team meetings, and
- individual support e.g., through P&C Business Partners, HSW Team and Employee Assistance Program, wellbeing events and activities, injury, and health management.

### 4.1 Employee Assistance Program

The EAP offering includes:

- confidential coaching and counselling service which is available to workers and eligible family members
- an established culturally safe support service to assist workers by using cultural knowledge to help understand and resolve matters within a cultural context
- manager support to provide leaders with support specifically relating to their role as a leader such as work relationships, wellbeing for team members or organisational change
- critical incident management which offers early intervention and support to workers and managers immediately following a critical incident, and
- holistic wellbeing offerings.

### 4.2 Injury and health management

Ahpra is committed to supporting the health, safety and wellbeing of employees affected by work-related and/or work-impacting medical conditions, injuries and disabilities. Continuing to work during recovery, post-injury or as part of ongoing health management is often beneficial to employees and so Ahpra aims to support employees through an active remain-at-work culture wherever possible, medically informed health support plans and early intervention strategies.

Ahpra complies with relevant State and Territory legislation relating to workers compensation requirements, including the appointment of a Return-to-Work Coordinator (RTW Coordinator) and the following for each Ahpra location:

- adequate workers compensation insurance in place
- information displayed for employees on how to notify of an injury and how to make a claim
- documented return to work program in place
- records kept of work-related injuries
- notification to the insurer within prescribed timeframes
- participation in the development of the employee's injury-management plan and compliance with obligations, and
- provision of suitable duties, as far as is reasonably practicable when an employee is able and safe to return to work.

Further information is available in the Injury and Health Management Policy and Procedures.

## Part 5 – Operations

### Introduction

The implementation of an effective HSWMS across a complex organisation operating in every state and territory has many challenges. To meet these challenges effective communication and consultation are essential. Ahpra has established a HSW committee with elected members in every jurisdiction plus a National HSW Committee which provides a comprehensive consultation and communication framework.

Ahpra continues to identify the risks present within the business to ensure that these are adequately assessed and that suitable control mechanisms are in place to mitigate the risk of harm. These control measures are reviewed and monitored for effectiveness. Currently the top three risk areas being actively managed and monitored including psychological injury, workstation ergonomics and slips, trips and falls.

Robust procedures around the procurement of goods and services and the management of contractors are in place to ensure that the risks are adequately managed.

## **5.1 Communication and Consultation**

Ahpra is committed to effective consultation and the participation of workers, and where appropriate, key stakeholders on the development, planning, implementation, performance evaluation and actions for improvement on health, safety and wellbeing matters.

Consultation with workers, Health & Safety Representatives and HSW Committee members helps Ahpra to better understand health and safety risks, make better decisions about how risks will be managed, and meet legal obligations.

Ahpra recognises the benefits of consulting with unions and union delegates on new or amended policy, and endeavours to do this through the established National Consultative Committee.

Ahpra have the following consultative arrangements in place:

- HSW committees.
- Employee representatives from each of the designated working groups within the state/territory offices attend to ensure the views and opinions of all employees at Ahpra are represented appropriately.
- Employee representatives are elected to the committee by means of nomination or ballot where more than one nomination per working group is received.
- In offices where a registered Health and Safety Representative (HSR) has been appointed, the HSR is automatically invited to be a member of the committee.
- WHS issue resolution procedure.

HSW consultation is undertaken when:

- identifying HSW hazards, assessing risks, and deciding how to manage them
- proposing changes that might affect workers' health and safety
- developing certain work procedures, and
- deciding what facilities workers need (e.g., toilets, eating facilities, first aid etc).

The procedures for the establishment, implementation and operation of HSW Committees can be found on the Intranet, [here](#).

There is currently a requirement for HSRs to be elected when requested by worker(s). Ahpra promotes the appointment of HSRs across all jurisdictions through existing communication channels. Further information on HSRs can be found on the Intranet.

## **5.2 Job Task / Hazard Analysis**

Ahpra conducts a job task analysis where specific roles, tasks or activities are identified through the risk management process as being high risk. Currently an external provider undertakes job safety analysis on behalf of Ahpra.

Where specific equipment is used which has a risk of injury or illness, a job safety assessment may be provided by the supplier / manufacturer.

A register of completed assessments can be found on the HSW system, Log It.

## **5.4 Training and competency**

Training is vital to assist workers to perform their work safely. Ahpra will arrange training which covers health, safety and wellbeing issues related to tasks being performed, as well as training in the overall

approach to health, safety, and wellbeing. Some training is mandatory and workers that do not complete their training may face disciplinary action.

Ahpra seeks to:

- ensure workers are afforded time to participate in health, safety and wellbeing training and information sessions
- conduct training needs analysis in relation to health and safety issues
- develop formal training needs and competencies for position requirements at all levels, including management
- provide formal induction programs for new and transferred workers and contractors which includes:
  - an overview of health and safety policies and procedures for the organisation and responsibilities
  - consultation and communication arrangements
  - hazard and incident reporting
  - emergency response
  - support mechanisms available e.g., line managers, P&C Business Partners, HSW Team, EAP etc
- use Registered Training Organisations (RTO) and appropriately accredited and approved courses/trainers where applicable
- keep a record of all training undertaken by workers
- review effectiveness of training, and
- ensure training and information is accessible for all workers.

All managers are provided with additional training to ensure that they are aware of their responsibilities under the HSWMS.

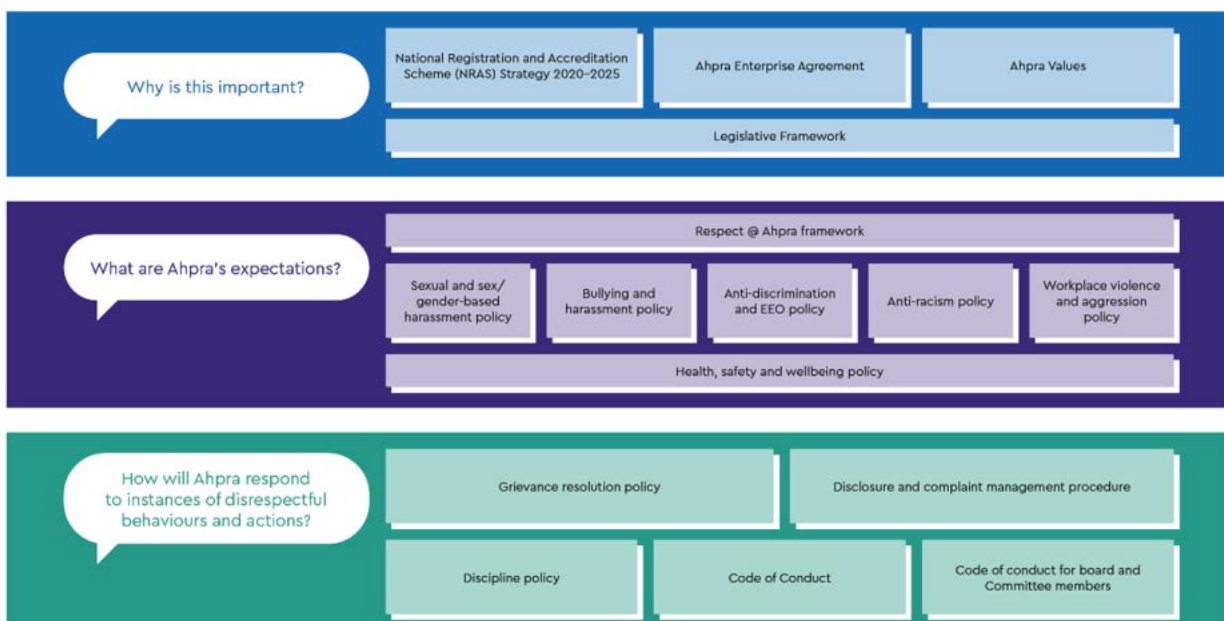
Records of completed HSW training should be retained.

## 5.5 Workplace Culture

Ahpra acknowledges the importance of reporting concerns about health, safety, and wellbeing in order to facilitate change, improve practices and reduce injury and illness. Injury and illness can be psychological as well as physical. Health and wellbeing injuries can be influenced by the workplace environment and culture.

As part of this Ahpra is committed to developing and maintaining safe, inclusive, and respectful workplaces through a combination of policy, processes and learning opportunities to increase worker awareness, understanding, capability and confidence. This is known as the Respect@Ahpra Framework, and this is outlined below:

Diagram 2: Respect@Ahpra Framework



To assist workers who may be affected by inappropriate behaviour in the workplace Ahpra has a network of volunteer Respect Officers who are trained to provide information and navigational support with concerns relating to discrimination, harassment, and bullying. The network does not replace the important role that managers and People and Culture Business Partners play in this space but rather offers an extra contact point for those that don't feel comfortable or ready for more formal reporting avenues.

## 5.6 Procurement & Contractor Management

Consideration must be given to health, safety and wellbeing issues before purchasing equipment, materials, facilities or substances.

Purchasing considerations for equipment and substances may include as appropriate:

- consultation with affected stakeholders
- identifying HSW requirements with supplier before purchasing
- determining HSW risks and conducting risk assessments, where required
- obtaining HSW information, manuals, instructions, design specifications from suppliers, where required
- ensuring compliance with legislation, Australian Standards etc
- appropriate risk control strategies in place for use, transport, and storage
- choosing best practice/least hazardous options
- reviewing purchased item prior to accepting delivery into workplace, and
- ensuring adequate record management.

More information can be found in the Procurement Policy.

In relation to building contractor management, documentation for the hiring of contractors or labour hire workers must include reference to site specific HSW risks, provision for HSW inductions and records for the review of HSW performance. Responsibility for building and facilities contractor management resides with the Property and Facilities Team. More information can be found in the Facilities Management Guideline and Management Plan for Property Contracts.

## 5.7 Outsourcing - Use of HSW consultants and consultative services

Ahpra engages the services of external vendors and consultants to provide a range of services to or on behalf of the organisation. These include the provision of an Employee Assistance Program provider, legislative compliance, ergonomic workplace assessments and various training vendors as examples.

In all instances, appropriate procurement processes are adhered to and where contracts are in place, regular contract performance meetings are held between Ahpra and the vendor.

Business Units are required to liaise with the HSW Team before engaging the services of external vendors and consultants to ensure alignment with the HSW Plan and that appropriate evidence is available to support the engagement.

# Part 6 – Performance evaluation

## Introduction

As outlined in AS/NZS ISO 45001, Officers are required to monitor, measure, analyse and evaluate its ongoing performance of the entire HSWMS in order to meet their due diligence obligations and ensure the effectiveness of the HSWMS Framework. This is achieved by engaging appropriate governance groups through the regular quarterly reporting process, inclusive of lead and lag indicators.

Quarterly HSW reports are provided to the Ahpra Board, Finance, Audit and Risk Committee and People and Remuneration Committee. Reporting is also provided to the National Executive as part of the P&C quarterly commentary and monthly metrics report. These various reports include:

- key HSW initiatives and status updates
- a variety of lead and lag indicators as outlined below

- a summary of significant incidents that may or may not have resulted in an injury or illness, including any 'notifiable incidents' and any incident that had the potential to cause serious injury or illness notices issued by regulatory bodies – including any penalties or infringements
- summary of workers' compensation claims including a brief description of any new claims for the month, total number of open claims, total claims costs, estimate of claims costs outstanding, average claims cost and any other critical information that may impact on future claims
- significant HSW communication events through Yammer, 3 Minute Mash and CEO Bulletin
- summary of legislation or regulatory changes
- emerging risks and opportunities, and
- improvements.

Lead indicators:	Performance measurement
<ul style="list-style-type: none"> <li>• Completion of workplace inspections, including Ahpra office inspections, ergonomic self-assessments, and home office checklists</li> </ul>	<ul style="list-style-type: none"> <li>• All employees who work from home have a current ergonomic assessment and a working from home check in place</li> <li>• Ahpra office inspections completed four (4) times a year as a minimum by the HSW Committee members for each jurisdiction</li> </ul>
<ul style="list-style-type: none"> <li>• Near-miss and hazard reporting</li> </ul>	<ul style="list-style-type: none"> <li>• Numbers and nature of reporting and corrective actions taken</li> </ul>
<ul style="list-style-type: none"> <li>• Compliance with mandatory training</li> </ul>	<ul style="list-style-type: none"> <li>• All workers have completed their mandatory compliance training e.g., HSW Induction module, Respect @ Ahpra</li> <li>• Appointed emergency wardens and first aid officers maintain current certification and complete mandatory training</li> </ul>
<ul style="list-style-type: none"> <li>• Participation in wellbeing events and sessions</li> </ul>	<ul style="list-style-type: none"> <li>• Number of offerings and attendance rates</li> </ul>
<ul style="list-style-type: none"> <li>• Job safety analysis of high-risk roles</li> <li>• Risk assessments covering both psychological and physical risks</li> </ul>	<ul style="list-style-type: none"> <li>• Actions identified, assessed, monitored and appropriate controls implemented</li> <li>• Ongoing monitoring and review</li> </ul>
<ul style="list-style-type: none"> <li>• HSW Team engagement and consultation</li> </ul>	<ul style="list-style-type: none"> <li>• HSW Team attendance at other team/function meetings to engage with or consult on HSW matters and promote wellbeing events and activities</li> </ul>
<ul style="list-style-type: none"> <li>• National and Local HSW committees meet four times a year</li> </ul>	<ul style="list-style-type: none"> <li>• Committee documentation completed and uploaded on the Intranet in a timely manner following each meeting</li> </ul>
<ul style="list-style-type: none"> <li>• Audit completion and findings</li> </ul>	<ul style="list-style-type: none"> <li>• Ahpra is subjected to independent audit in relation to compliance with the HSWMS in accordance with an agreed timetable. The independent auditor will be engaged by the Risk and Assurance Committee. The HSW Team monitors and provides updates on progress against audit outcomes.</li> </ul>
<ul style="list-style-type: none"> <li>• Consultation with workers on new or amended HSW policy or procedures</li> </ul>	<ul style="list-style-type: none"> <li>• Volume of consultations held, and number of responses submitted by workers</li> </ul>
<ul style="list-style-type: none"> <li>• HSW issue resolution</li> </ul>	<ul style="list-style-type: none"> <li>• Number of issues raised, resolved and addressed</li> </ul>

<ul style="list-style-type: none"> <li>Workers' compensation claims</li> </ul>	<ul style="list-style-type: none"> <li>Work-related injury or illness managed through workers compensation insurance</li> <li>Noting the stigma with mental health in particular, workers compensation is a sign of a positive reporting culture</li> </ul>
<b>Lag indicators:</b>	<b>Performance measurement</b>
<ul style="list-style-type: none"> <li>Frequency and severity of injuries</li> <li>Lost time incidents and lost time incident frequency rate (LTIFR)</li> </ul>	<ul style="list-style-type: none"> <li>Statistics relating to the incidents reported on Log It</li> <li>Identified trends and any proposed mitigations/controls</li> </ul>
<ul style="list-style-type: none"> <li><a href="#">Notifiable incidents</a></li> </ul>	<ul style="list-style-type: none"> <li>Incidents that require reporting to the regulator, including: <ul style="list-style-type: none"> <li>the death of a person</li> <li>a 'serious injury or illness', (in WA this also includes where 10 days lost time has occurred)</li> <li>a 'dangerous incident' that exposes someone to a serious risk, even if no one is injured or</li> <li>sexual assault.</li> </ul> </li> <li>Any penalties or infringements issued by a HSW regulator</li> </ul>
<ul style="list-style-type: none"> <li>Complaints relating to inappropriate behaviours including bullying/harassment/sexual assault etc</li> </ul>	<ul style="list-style-type: none"> <li>Some jurisdictions require reports to be provided to the regulator relating to the numbers of complaints received e.g. Victoria.</li> </ul>

Lead indicators are pro-active in nature and assist in predicting and preventing injury and illness in the workplace. These indicators focus on future safety performance and continuous improvement.

Lag indicators are reactive and provide information after the event. They can offer early indications into systemic issues.

Ahpra recognise that an improved HSW culture will lead, initially, to increased reporting of HSW incidents, hazards and near-misses. This increase will enable pro-active measures to reduce injury, illness and the severity of these moving forward. An increase in reporting will help our safety culture to mature and drive continuous improvement as well as increasing trust and accountability.

Procedures associated with accident / incident investigation are located on the intranet.

## 6.1 HSW Issues Resolution

Any worker has the right to raise a HSW issue or concern. This procedure describes how such issues once raised are to be resolved. The issue resolution procedure has been agreed between Ahpra leadership and its workers after due consultation.

The objective of this procedure is to ensure the clear, efficient, and effective resolution of all WHS issues raised within Ahpra. Leadership is committed to the provision of a safe and productive workplace and this procedure is an important part of Ahpra's HSWMS.

Procedures associated with issues resolution are located on the intranet *HSW009 HSW Issue Resolution Procedure*.

## 6.2 Performance Reporting & KPI's

Ahpra collates data concerning the lag and lead indicators which is then shared with relevant governance groups and stakeholders on a monthly or quarterly basis. The National and Local HSW Committees are provided with incident, hazard, and near-miss statistics for discussion at committee meetings.

The HSW Team provide regular updates in reports on the status and progress of identified actions.

## Part 7 – Improvement

In addition to the improvement actions identified through audit and inspection, further opportunities for improvement include:

- regular review of feedback and participation of workers, predominantly through established HSW committees
- remedial actions identified as a result of non-conformities.
- regular review of controls established to identified risks
- corrective actions from:
  - hazard, near-miss and incident investigations to address and eliminate the root causes
  - reviews of existing control measures

Improvements will be captured through the HSWMS.

Ahpra strives to continually improve and embed health and safety as a way of working.

## Relevant legislation

Occupational Health and Safety Act 2004 (Vic) Procurement Policy

[Safe work Australia – Law and Regulation](#)

Work Health and Safety Act 2011 (ACT)

Work Health and Safety Act 2011 (NSW)

Work Health and Safety (National Uniform Legislation) Act 2011 (NT)

Work Health and Safety Act 2011 (Qld)

Work Health and Safety Act 2012 (SA)

Work Health and Safety Act 2012 (Tas)

Work Health and Safety Act 2020 (WA)

## References / links to other documents / related documents

[Health safety and wellbeing hub](#)

[HSW014 – Health, safety and wellbeing policy](#)

[HSW010 - HSW responsibilities guideline](#)

[Log It intranet page](#) – for resources and tip sheets

[Respect at Ahpra framework](#)

## Definitions

Term	Definition
<b>Act</b>	A law (legislation) passed and enacted by a state or territory parliament, also commonly known as an Act of Parliament. Acts are the principal pieces of law covering, in this case, health and safety in the workplace.
<b>Approved code of practice</b>	An approved code of practice provides practical guidance to meeting legislative obligations required by Acts and Regulations. It should always be followed unless there is another solution which achieves the same or a better standard of health and safety in your workplace.
<b>AS/NZS ISO 45001</b>	ISO 45001, <i>Occupational health, and safety management systems – Requirements with guidance</i> for use is the international standard (adopted by Australia and New Zealand AS/NZS ISO 45001) focussing on risk prevention, innovation and continual improvement. Specification with guidance for use, published by Standards Australia (ISO 45001 published by the International Organisation for Standards (ISO)).
<b>Board member</b>	Members of the National Boards and their committees, including state, territory, and regional Boards.
<b>Consultation</b>	When considering health and safety issues the employer must share relevant information with workers; give workers a reasonable opportunity to express views about health and safety issues and take those views into account when making decisions. Where workers are represented by an HSR, the consultation must involve the HSR.
<b>Contractor</b>	An individual directly employed by a professional services company (including a sole operator) engaged to provide works or services (i.e., not a recruitment agency) and is paid for the hours worked by their employer. Not an Ahpra employee, engaged through a procurement process with a Professional Services contract supported by a purchase order and paid via invoice.
<b>Controlled document or record</b>	Any document for which distribution and status are to be kept current by the issuer to ensure that authorised holders or users have available the most up to date version.
<b>Corrective action</b>	Action to eliminate the cause of a detected nonconformity or other undesirable situation.
<b>Due diligence</b>	An officer must take reasonable steps to: <ul style="list-style-type: none"> <li>a) to acquire and keep up-to-date knowledge of WHS matters,</li> <li>b) understand the PCBU's operations and hazards and risks,</li> <li>c) ensure PCBU allocates resources and has processes to minimise risks,</li> <li>d) ensure PCBU receives and considers information regarding incidents, hazards and risks and responds in a timely fashion,</li> <li>e) ensures the PCBU has in place processes for complying with WHS obligations and duties,</li> </ul>



	<p>f) verify the provision and use of resources and processes in c – e above.</p> <p>(Sec 27.5 Model WHS Act 2010)</p>
<b>Work Group</b>	A work group is a negotiated and agreed grouping of workers who share similar workplace health and safety interests and conditions. One of the main functions of the work group is to elect health and safety representatives (HSRs).
<b>Employee</b>	A person employed directly with Ahpra in a permanent ongoing role, on a temporary or fixed term contract, or on a casual basis and paid through Ahpra's payroll.
<b>Hazard</b>	A hazard is a source or a situation with a potential for harm in terms of human injury or illness, damage to property, damage to the environment, or a combination of these.
<b>Hierarchy of control</b>	A hierarchical structure of actions that can be used to control risk, listed in order of effectiveness.
<b>Incident</b>	An incident is any unplanned event resulting in, or having a potential to result in injury, ill health, damage, or loss.
<b>Inspector</b>	An inspector appointed by the regulator under Part 9 or the WHS legislation.
<b>Lost time injury (LTI)</b>	An occurrence that resulted in a fatality, permanent disability or time lost from work of one day/shift or more.
<b>Lost-time injury frequency rate</b>	The number of lost-time injuries within a given accounting period, relative to the total number of hours worked in that period.
<b>Others/other persons</b>	Those persons outside of Ahpra that may be affected or impacted by the work that Ahpra undertakes e.g., health practitioners, witnesses, notifiers etc
<b>Safety data sheet</b>	Information containing data regarding the properties and effects of a particular substance that must be provided by the manufacturer, supplier, or importer of the hazardous substance/dangerous good. Safety Data Sheets must be current – within 5 years of the issue date and meet specific legislated format requirements.
<b>Officers</b>	An officer within the meaning of section 9 of the Corporations Act 2001 – an officer is a person who is involved in making decisions affecting the whole or a substantial part of an organisation or a person who has the capacity to significantly affect the organisation's financial standing. <b>Refer to Ahpra HSW Policy for more information on identified Ahpra officers.</b>
<b>PCBU</b>	PCBU stands for 'Person who conducts a business or undertaking'. Given that Ahpra conducts a business or undertaking, it is deemed a PCBU.
<b>Regulations</b>	Regulations are law that is created under the authority of an Act. Regulations are subordinate to an Act and are the secondary level of law covering, in this case, health and safety in the workplace.
<b>Risk</b>	Risk is effect of uncertainty on objectives (AS/NZS 31000:2009 – Risk management – Principles and guidelines). An effect is a deviation from the expected – can be positive and/or negative.

	Risk is normally expressed in terms of a combination of the consequence of the event and the associated likelihood of occurrence.
<b>WHS</b>	Work, health, and safety including injury management. At Ahpra, we prefer to use the term health, safety and wellbeing and the abbreviation HSW. These mean the same thing.
<b>WHS documents</b>	Include, but not limited to policies, procedures, guidelines, programs, agreements, forms, checklists, templates, risk assessments and safe work procedures.
<b>WHSMS</b>	Work Health and Safety Management System. At Ahpra, we have utilised the contemporary term Health, Safety and Wellbeing (HSW) and therefore it is known as the HSWMS. These mean the same thing.
<b>HSR</b>	Health and Safety Representative - A member of a work group elected to represent that work group on matters relating to occupational health and safety.
<b>WHS records</b>	Include, but not limited to audit reports, workplace inspections, risk assessments, safe work procedures, training plans and registers, WHS meeting minutes, emergency evacuation reports, health monitoring reports, document control registers, inspection testing and monitoring reports and corrective action registers.
<b>Worker</b>	A person who carries out work for Ahpra, including National Executive, employees, contractors and agency staff, volunteers, interns, work experience staff and statutory appointees (board, committee and panel members)
<b>Workplace</b>	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. This includes a worker's home office.
<b>Work Health and Safety Committee</b>	<p>A cooperative forum for employers and workers to work together on OHS issues. WHSCs are involved in the development, review, and communication of WHS standards, rules and procedures in the workplace.</p> <p>At Ahpra our WHSCs are called Health Safety and Wellbeing Committees but these mean the same.</p>

<b>Document control</b>	
<b>Reference number</b>	WHS 001
<b>Approval authority</b>	Ahpra Board
<b>Owner (administrative)</b>	Executive Director People and Culture
<b>Responsible Officer</b>	National Director Employee Services
<b>Approval date</b>	13 February 2024
<b>Start date</b>	14 February 2024
<b>Next review due date</b>	14 January 2027

## Appendix

### HSW document library (available on the HSW hub)

#### HSW policies and procedures

- Chemical management policy
- Clean desk policy
- Duress alarm procedure
- Health, safety, and wellbeing policy
- Injury and health management policy and procedure
- HSW issues resolution procedure
- Workplace violence and aggression policy

#### HSW guidelines and protocols

- Emergency warden responsibilities
- First aid officer responsibilities
- HSW issue resolution and incident reporting protocol
- HSW responsibilities guideline
- Office presence guideline
- Workplace violence and aggression guideline
- Workstation ergonomics guideline

#### HSW forms/other documentation

- Chemical register
- Ergonomic self-assessment form (Log It)
- First aid kit checklist
- Home office checklist (Log It)
- Hazard report form (Log it)
- Incident report form (Log It)
- Notifiable incidents – quick reference
- Nominating for first aid and emergency warden officers
- Personal emergency evacuation plan (PEEP)
- Self-care plan template