



WORK HEALTH & SAFETY POLICY

WHS-001

Document title	Work Health & Safety Policy
Document ID	WHS-001
Version	10.0
Status	Current
Effective date	27 July 2026
Purpose	To outline the College's compliance framework for work health and safety, including key terms, roles and duties, and the implementation and monitoring of measures to ensure, as far as is reasonably practicable, the health and safety of workers and all other persons at the College.
Scope	The Board, all Officers, all Workers and Other Persons at the College, including students and parents/guardians.
Authorised by	St Patrick's College Townsville Limited (Governing Body) Date of Authorisation: February 2021
References	Work Health and Safety Act 2011 (Queensland); Work Health and Safety Regulation 2011 (Queensland); Workplace Health and Safety Queensland Codes of Practice; Managing the risk of psychosocial hazards at work: Code of Practice 2022; Education (Accreditation of Non-State Schools) Act 2017 (Queensland); Education (Accreditation of Non-State Schools) Regulation 2017 (Queensland); Corporations Act 2001 (Commonwealth); Risk Management Framework; Incident Reporting Form; Workplace Bullying Policy; Complaints Handling Policy and Complaint and Dispute Resolution Procedure; Sexual Harassment Policy; Anti-Discrimination Policy; Staff Code of Conduct; Whistleblower Policy; Boarding Staff Handbook; Administration of Medication Policy; Child Safety and Wellbeing Policy (CP-006); Reportable Conduct Procedure (CP-001).
Review date	Annually, and on substantive amendment to the Act, the Regulation, the Education (Accreditation of Non-State Schools) Regulation 2017 (Queensland) or a principal interface instrument Next Review Date: 27 July 2027
Plan owner	St Patrick's College Townsville Limited (Governing Body)





POLICY STATEMENT

St Patrick's College Townsville is committed to providing and maintaining a safe and healthy workplace for all workers (including contractors and volunteers) as well as students, visitors and members of the public. Hazards and risks to health and safety will be eliminated or minimised, as far as is reasonably practicable. In doing so, the College will comply with the Work Health and Safety Act 2011 (Queensland) (the Act), the Work Health and Safety Regulation 2011 (Queensland) (the Regulation) and relevant codes of practice.

This commitment is in line with the College's responsibility under the Education (Accreditation of Non-State Schools) Regulation 2017 (Queensland) to comply with the requirements of the Work Health and Safety Act 2011 (Queensland). This Policy is one of the principal instruments by which the College gives effect to its section 16 obligations regarding the health and safety of staff, with the Student Code of Conduct and the Child Safety and Wellbeing Policy (CP-006) as the parallel instruments for the student-conduct dimensions. The College acknowledges that its residential boarding precinct is a workplace under the Act, and that psychosocial safety is a dimension of health and safety that is co-equal with physical safety, consistent with the post-2022 regulatory environment.

The College's positive-duty obligations under section 47C of the Sex Discrimination Act 1984 (Commonwealth) operate alongside the Work Health and Safety Act framework. A broader Queensland positive duty under the Respect at Work and Other Matters Amendment Act 2024 (Queensland) has been passed but is not yet in force, its commencement having been deferred, and will apply once it is proclaimed. The Sexual Harassment Policy and the Anti-Discrimination Policy are the College's principal operational instruments for these positive-duty regimes.

Definitions

- **Person Conducting a Business or Undertaking (PCBU) (Act, section 5):** includes those operating a business alone or with others, for profit or not-for-profit, and partners in a partnership. A person is not a PCBU if solely a worker or officer in a business, an elected member of a local government, or a volunteer association. Examples include a company, an association, a sole trader, or partners in a partnership.
- **Officer (Act, section 4):** a person who makes or participates in making decisions that affect the whole or a substantial part of the business or undertaking. In a College this may include members of the College board and senior leadership employees such as the Principal or Business Manager, Chief Financial Officer or Chief Operating Officer.
- **Worker (Act, section 7):** includes employees, contractors and subcontractors and their employees, employees of a labour hire company assigned to work in the College, outworkers, apprentices, trainees, students gaining work experience, and volunteers. A PCBU, for example a sole trader, can also be a worker if they carry out work in the business.
- **Health (Act, section 4):** means physical and psychological health, so the College's health and safety duties extend to psychological as well as physical safety.
- **Health and Safety Representative (HSR) (Act, Schedule 5):** a worker, elected by workers, to represent the health and safety of the work group of which the worker is a member. An HSR's duties include representing workers in matters related to health and safety; investigating complaints; inquiring about risks to workers; requesting and receiving information; monitoring measures undertaken by the PCBU; accompanying a work health and safety entry permit holder; inspecting the workplace, including with an inspector; requesting a health and safety committee be established; directing that unsafe work cease; issuing provisional improvement notices in certain circumstances; being present, with a worker's consent, at an interview concerning work health and safety; and requesting assistance from a suitable entity when necessary.
- **Work Health and Safety Officer (WHSO) (Act, section 103B):** a suitably qualified person appointed by the PCBU to assist in fulfilling the PCBU's work health and safety duties, including identifying and reporting on matters, hazards and risks, notifying or investigating incidents, accompanying or assisting an inspector, and establishing training. The PCBU may also act in the role.
- **Health and Safety Committee (HSC) (Act, section 75):** a body established to facilitate cooperation between the PCBU and workers and to assist with compliance, including developing standards, rules and procedures. Membership must include the HSR and the work health and safety officer, if these positions have been established at the College, and at least half of the members must be workers not nominated by the PCBU.





- **Reasonably practicable (Act, section 18):** what is reasonably able to be done to ensure the health and safety of workers and other persons at the College. Determining what is reasonable requires weighing relevant matters such as the likelihood and degree of harm, the availability of ways to eliminate or minimise the risk, and the associated cost, including whether it is grossly disproportionate to the risk.
- **Notifiable incident (Act, section 35):** a death, serious injury or illness, or a dangerous incident at the workplace relating to a worker or other person. Such incidents must be reported to Workplace Health and Safety Queensland immediately after the College becomes aware of the incident.
- **Serious injury or illness (Act, section 36):** where a person needs immediate treatment as an in-patient in a hospital, or treatment for certain prescribed injuries such as amputation, a serious head or eye injury, a serious burn, separation of skin from tissue, a spinal injury, loss of a bodily function, or serious lacerations. It also includes medical treatment within 48 hours of exposure to a substance.
- **Dangerous incident (Act, section 37):** an incident at a workplace where a worker or other person's health and safety is at risk due to exposure to an uncontrolled event, for example a substance spillage, explosion or fire, or an accident such as a fall, electric shock or the collapse of a structure.
- **Psychosocial hazard:** a hazard that arises from, or relates to, the design or management of work, the working environment, plant at a workplace, or workplace interactions or behaviours, and that may cause psychological or physical harm (Safe Work Australia Model Code of Practice).
- **Psychosocial risk:** the risk to the health or safety of a worker arising from a psychosocial hazard.
- **Hierarchy of control:** the ranked approach to managing risk under the Regulation: first eliminate the risk so far as is reasonably practicable, then minimise it through substitution, isolation and engineering controls, then administrative controls, and then personal protective equipment.
- **Workplace:** a place where work is carried out for a business or undertaking and includes any place where a worker goes, or is likely to be, while at work. The College's residential boarding precinct is a workplace under the Act.

ROLES AND DUTIES

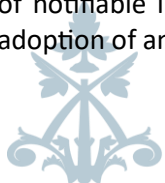
The Act outlines the duties held by the Person Conducting the Business or Undertaking, Officers, Workers and other persons within the College community. The College acknowledges that these duties cannot be transferred or delegated. More than one person can concurrently have the same duty, and each duty holder must comply to the standard required by the legislation. If more than one person has a duty for the same matter, each must carry it out to the extent they have the capacity to influence and control the matter, and must, so far as is reasonably practicable, consult, cooperate and coordinate with all others who have a duty for the same matter.

Person conducting the business or undertaking (PCBU)

The PCBU has the primary duty of care under the Act to ensure, so far as is reasonably practicable, that the health and safety of workers and any other person is not put at risk from work carried out in conducting the business. In fulfilling this duty, the College will:

- provide and maintain a work environment without risks to health and safety;
- provide and maintain safe plant and structures;
- provide and maintain safe systems of work;
- ensure safe use, handling and storage of plant, structures and substances;
- provide adequate facilities for workers' welfare;
- provide information, training, instruction or supervision;
- monitor the health of workers and the conditions at the College to prevent illness or injury.

In addition to the primary duty of care, the College will ensure, so far as is reasonably practicable: safe entry to and exit from the College; that anything arising from the College is free from risk to health and safety; that fixtures, fittings and plant are without risks; the provision of consultation, cooperation and issue resolution to workers; the reporting of notifiable incidents as soon as the College becomes aware of them; and compliance with codes of practice or adoption of an equivalent or higher standard.





If a worker occupies accommodation owned by or under the management or control of the College, and the occupancy is necessary for the worker's engagement because other accommodation is not reasonably available, the College will, so far as is reasonably practicable, maintain the premises so that the worker is not exposed to risks to health and safety (Act, section 19(4)).

The Regulation also imposes specific PCBU duties. In fulfilling these, the College will identify reasonably foreseeable hazards; ensure general workplace facilities meet minimum requirements; ensure first aid equipment and training meet minimum requirements; ensure an emergency plan is prepared, maintained and implemented; and ensure psychosocial risks are appropriately managed, including but not limited to the risk of sexual harassment or sex or gender-based harassment (Regulation, section 55C, and the Managing the risk of psychosocial hazards at work: Code of Practice 2022).

Officers

Officers have a duty under the Act to exercise due diligence by ensuring the PCBU complies with its duties. Officers of the College will exercise due diligence by acquiring and keeping up-to-date knowledge of work health and safety; understanding the nature of the College's operations and the associated hazards and risks; ensuring the College has resources and processes to eliminate or minimise risks; ensuring processes for receiving, considering and responding to information about incidents, hazards and risks; ensuring processes for complying with work health and safety legislation; and auditing and reviewing those processes and the use of resources.

The Officers of the College under section 27 of the Act are the Governing Body Members, the Principal, and senior College Leadership Team members who make, or participate in making, decisions affecting the whole or a substantial part of the College's operations. The Officer due-diligence obligations are personal compliance obligations on those individuals, not solely an organisational matter.

Workers

Workers of the College have the following duties: to take reasonable care for their own health and safety; to take reasonable care that their conduct does not adversely affect others, for example through bullying, harassment, discrimination or intimidation; to comply, so far as they are reasonably able, with instructions given by the College; and to cooperate with any reasonable, notified policy or procedure.

If a worker contravenes this Policy, whether or not in doing so they place the health or safety of themselves or others at risk, they may be subject to disciplinary action.

Workers also have a responsibility to report to the College any hazards or incidents they observe, whether or not they are themselves affected.

Other persons

All other persons at the College have a duty to take reasonable care for their own safety, to ensure their conduct does not adversely affect others, and to comply, so far as they are reasonably able, with reasonable instructions given by the College.

Other roles

The College may establish additional roles or committees to assist in managing its work health and safety duties, including appointing one or more Health and Safety Representatives by election to represent workers (the College must hold an election where one or more workers requests one); establishing a Health and Safety Committee to facilitate cooperation and assist with compliance (the College must establish one if requested by an HSR or required by regulation); and appointing a Work Health and Safety Officer with the minimum qualifications and a certificate of authority issued by Workplace Health and Safety Queensland.

IMPLEMENTATION

The College is committed to protecting workers and other persons against harm to their health and safety and will implement a risk management framework, the provision of information, training, instruction and supervision, and a process for consultation, cooperation and issue resolution, in line with the Act and the Regulation.





Risk Management Framework

The College's Risk Management Framework provides further guidance on the process and approach to managing risks. Where the approach does not eliminate a risk, the College must minimise it, so far as is reasonably practicable, by substituting the hazard with something giving rise to a lesser risk, isolating the hazard, or implementing engineering controls; then, if a risk remains, by administrative controls; and then, if a risk remains, by the provision and use of suitable personal protective equipment. Where the risk relates to sexual harassment or sex or gender-based harassment, the controls considered must take account of the matters in the Regulation (section 55F).

The College manages psychosocial risks using the same hierarchy of control. It identifies, assesses and controls psychosocial hazards, including those identified in the Code of Practice: high job demands, low role clarity, poor support, low recognition and reward, poor organisational change management, exposure to traumatic events, fatigue, and harassment and bullying. The Workplace Bullying Policy, the Sexual Harassment Policy and the Anti-Discrimination Policy are the operational instruments for the harassment, bullying and discrimination dimensions of psychosocial risk.

Information, training, instruction and supervision

The College will ensure that appropriate information, training, instruction and supervision is provided to workers to enable them to perform their work without risk to health or safety, so far as is reasonably practicable, having regard to the nature of the work, the nature of the associated risks, and the control measures implemented. It will be provided in a way that is readily understandable. The College's Staff Handbook provides further guidance.

Training arrangements include the College's child safety obligations under section 16 of the Education (Accreditation of Non-State Schools) Regulation 2017 (Queensland) and the Queensland Child Safe Standards, cross-referenced to the Child Safety and Wellbeing Policy (CP-006). Several psychosocial hazards have a child-safety dimension in this College: exposure to traumatic events (including disclosures of harm by students), harassment or bullying of a worker for raising a child-safety concern or engaging with the Reportable Conduct Scheme (which also engages the Whistleblower Policy and the Reportable Conduct Procedure, CP-001), and inadequate support for workers carrying significant responsibility for child welfare. The College manages these as psychosocial hazards with attention to their child-safety consequences.

Consultation, cooperation and issue resolution

The College acknowledges its duty to consult, so far as is reasonably practicable, with workers who are or are likely to be directly affected by work health and safety matters, including identifying, assessing and eliminating or minimising risks, proposed changes to procedures, and the provision of information and training. Consultation includes sharing information and giving workers a reasonable opportunity to express their views, contribute to the decision-making process, and access information on the outcome in a timely manner.

The College will refer to the Complaints Handling Policy for further guidance on resolving work health and safety issues. Work-health-and-safety issue resolution operates alongside, not instead of, the specific complaint pathways: the Workplace Bullying Policy, the Sexual Harassment Policy, the Whistleblower Policy and the Anti-Discrimination Policy. Workers may use whichever pathway is most appropriate to the matter.

COMPLIANCE AND MONITORING

Incident reporting

The College has implemented incident and hazard reporting processes that require workers and other persons to report any hazards or incidents resulting in potential or actual harm to health and safety. The College will regularly monitor, collate and report on hazards and incidents. An incident involving harm to a child, whether a student, a child of a worker, or otherwise, may engage parallel obligations under section 366 of the Education (General Provisions) Act 2006 (Queensland) and section 13E of the Child Protection Act 1999 (Queensland); the work-health-and-safety incident reporting framework does not displace those obligations. A critical incident involving a child engages the Critical Incident Management Procedure and the broader child safety framework, operating in parallel with this framework.

Notifiable incidents

The College is committed to reporting notifiable incidents to Workplace Health and Safety Queensland in accordance with the Act and the Regulation. Notifiable incidents include the death, serious injury or illness of a person, or a dangerous incident. The College will notify the regulator immediately and by the fastest means possible after becoming





aware of a notifiable incident, and will preserve the incident site so far as is reasonably practicable until the inspector arrives.

Training

The College will train its staff on this Policy and any related processes relating to the health, safety and conduct of staff and students at induction, and will refresh training annually, including the College's Child Safe Standards training framework.

Appointment of a Health and Safety Representative

The College will facilitate the election of a Health and Safety Representative where a worker asks for one to be elected. Where the role becomes vacant, the College will, as soon as reasonably practicable, notify workers about the powers of the Representative and the election process and invite them to request an election. If the College does not have a Representative, it will notify workers and invite a request, repeated annually if no request is received.

Health and Safety Committee

The College will establish a health and safety committee within 28 days if requested to do so by an HSR or five or more workers.

Implementing the processes

The College will ensure it is implementing this Policy and any related processes relating to the health, safety and conduct of staff and students by auditing compliance annually.

Accessibility of processes

This Policy and any related processes relating to the health, safety and conduct of staff and students are accessible on the College website and the Learning Hub.

Complaints procedure

Suggestions of non-compliance with this Policy and any related processes may be submitted as complaints under the College's Complaints Handling Policy.

