

SGH group workplace health & safety policy

As SGH has staff members in both Victoria and New South Wales, it has obligations as an employer under the **Occupational Health and Safety Act 2004** (OH&S Act) (Victoria) and **Work Health and Safety Act 2011** (WHS Act) (New South Wales), together referred to in this Chapter as “the Acts”, to ensure that it provides a healthy (both physical and psychological) working environment for its staff. *Noting, in Section 5 of the OHS Act, health is defined as including psychological health.* Directors consider such an environment is conducive to staff being able to perform their work and deliver on SGH’s commitment to its clients.

SGH is committed to ensuring that employees are safe from hazards and risks to their health and safety whilst at work. SGH will endeavour to pursue continual improvement of safety performance with the aim of eliminating work related injury and illness.

Employees also have obligations to ensure their own health and safety and that of their co-workers. Each employee is personally responsible for working in a safe manner and co-operating with each other to ensure work health and safety. The co-operation of all employees to adhere to safe work practices and observe safety rules and regulations at all times is vital for the success of SGH’s commitment to health and safety.

All employees agree to abide by State and Federal legislation, codes, regulations, rules and SGH’s Occupational Health and Safety Policy.

Any breach of this policy, or an employee’s obligations of health and safety towards themselves or others may result in disciplinary action being taken against employees, up to and including dismissal.

If any employee has any concern or query regarding work health and safety, they should notify the CEO as soon as possible so that the issue can be reviewed without delay.

17.1 Legislative Obligations

Both the WHS Act and the OH&S Act set out legal obligations relating to work health and safety. Under each Act, a person conducting a business or undertaking must ensure, so far as is reasonably practicable, the health (both physical and psychological) and safety of staff and other persons at work, as well as ensuring other persons are not put at risk from work carried out as part of the conduct of the business or undertaking.

The Company is a person conducting a business or undertaking.

The obligations under the Acts apply to any person that carries out work in any capacity for the Company including staff, contractors and sub-contractors (and each of their workers), staff of a labour hire company, outworkers, trainees, visitors, students gaining work experience and volunteers whilst in the workplace.

Annually SGH is obliged to lodge a Workers Compensation Registration form with both the Victorian and New South Wales State Government Insurer covering the staff normally residing in each State.

You are protected by compensation insurance purchased by the company for work related injuries or illnesses. In accordance with relevant legislation, SGH displays information on what to do if you are injured, including the details of the insurance company, on the "If you are injured" poster located in the kitchen and on the first aid cupboard in the printer room.

If you are injured while at work please notify your Manager immediately to assure eligibility for this benefit. You will also be required to record the injury. To do this, complete a Register of Injuries form in the SGH Group Forms directory on the SGH Intranet. This should be completed with the support and assistance of a First Aid Officer to ensure it is completed correctly and appropriate records can be made.

Medical coverage is normally 100% reimbursed and is paid directly to the hospital and doctor by SGH's insurance carrier.

Weekly disability coverage is paid after a state mandate waiting period. The amount of compensation paid is determined by state law and based on an average weekly wage specific to the injured employee.

If you have any questions regarding worker's compensation, please speak with the CEO.

17.2 Responsibilities Under the Acts

SGH's responsibilities under the Acts are similar and include requirements to:

1. Develop and implement effective procedures to systematically identify hazards, assess risks and eliminate or control risks to the lowest level reasonably practicable.
2. Provide suitable mechanisms to consult and communicate with staff.
3. Develop and implement systems of work that are safe and without risk.
4. Provide workplaces that are safe and without risk to health.
5. Provide and maintain plant (machinery, equipment and appliances) and substances appropriate for our work.
6. Provide adequate information, instruction, training and supervision to workers, and
7. Provide adequate facilities for the welfare of workers.

17.3 Worker Responsibilities

Staff have a legal responsibility to take reasonable care so as not to expose themselves or others to risk of injury in the workplace. This includes requirements to:

1. Comply with all policies, procedures and other requirements in place to protect health and safety in the workplace.
2. Comply with all reasonable directions from Managers in relation to health and safety issues in the workplace.
3. Reiterate legal and compliance requirements to co-workers at the time of observing non-compliance and through consultative forums.
4. Report hazards, incidents and injuries in the workplace to the CEO and Office Manager as soon as reasonably practicable. This includes reporting actual injuries and 'near misses'

(that is, where an incident has occurred which had the potential to cause personal injury or damage to company property, even if no injury or damage occurred).

5. Attend and participate in all mandatory SGH health and safety activities and training.
6. Participate in work health and safety consultation.
7. Ensure they understand how to use equipment safely, and use all equipment in the correct manner, as directed.
8. Generally, cooperate with SGH as required to enable compliance with the law.

17.4 Contractors and Sub-Contractors

From time-to-time contractors and sub-contractors may be engaged to work in the organisation. More likely examples are in the setting up of a new office, the upgrade of physical assets held and the providing of technical services. Directors working on the premises at such time will consider depending on the activity being provided:

1. Whether separate insurances need to be held for the work to be undertaken.
2. Develop and implement safe work or operating procedures tailored to the work being undertaken.
3. Maintain safe, clean and tidy work areas.
4. Ensure all workers are adequately trained to carry out contracted tasks safely and competently.
5. Possess all necessary licences and certificates of competency for contracted works.
6. Comply with any induction and safety rule requirements.

17.5 Visitor Responsibilities

From time-to-time visitors come to the Company's offices. Given the small size of the office, Directors or the most senior staff member meeting visitors have responsibility for ensuring visitors comply with this Policy.

17.6 Working Environment Assessment

First Aid

SGH's workplace is considered low risk. Premises are centrally located to hospitals if access were to be required. A first aid kit is held on the premise for basic medical matters.

Emergency Procedures

Staff are informed that in the case of an emergency evacuation being required, stairs are to be used to evacuate to the ground floor. There is a separate gathering location for staff to meet.

Workplace Hazards

Directors working on the premises have to consider possible physical, chemical, biological and mechanical or electrical hazards in the workplace design. In relation to work itself Directors are aware of psychological impact work can have on health as well as persons being able to properly perform their work activities.

Staff should report possible hazards in the workplace to the Office Manager and the CEO.

Bullying and Stress

Bullying will not be tolerated in the business and neither will inappropriate conduct nor unlawful harassment of or by staff.

Cleanliness of the work environment

It is company policy that documents or other hazards are not placed on the floor. In addition, staff should ensure that workstations are kept clear of unnecessary clutter.

17.7 Incident and Injuries

In cases of incidents and injuries, the Chief Executive Officer (or his delegate) is to be informed at the time of occurrence to assess whether or not a claim should be made against the workers compensation policy that is held. Any such claims are to be reported to the Board at its next meeting.

17.8 Working from Home

SGH under its OH&S obligations has a duty of care to all employees who work for us – regardless of where that work is undertaken.

Where employees work from home on a regular basis, we have an obligation to make reasonable enquiries to determine that their home office environment is safe. To meet this obligation, we need to have a risk assessment of your home office; and have prepared a Working from Home – OHS Checklist which the employee should complete.

If an employee works at home on a regular basis (and with their Manager's approval), they need to complete the Working from Home – OHS Checklist (Appendix E); and include a photo of the workstation (desk, chair, phone and computer) where they undertake their work.

Completed checklists should be returned to the Chief Executive Officer. An example of how you might set-up your home office workspace is included at Appendix E.

17.9 Alcohol and Drugs

SGH is concerned by factors affecting an employee's ability to safely and effectively do their work to a satisfactory standard. The business recognises alcohol or other drug abuse can impair short-term or long-term work performance and is an occupational health and safety risk.

SGH will do its utmost to create and maintain a safe, healthy and productive workplace for all employees. SGH has a zero-tolerance policy in regards to the use of illicit drugs on our premises or the attending of other business-related premises (e.g. clients) while under the influence of illicit drugs. Contravening either of these points may lead to instant dismissal.

SGH does not tolerate attending work under the influence of alcohol. This may result in performance improvement action or dismissal.

SGH, at times, makes alcohol available to staff over the age of 18. Limiting the consumption of any alcohol made available is the responsibility of the employee. Driving over the legal limit or under the influence of illicit drugs is illegal.

17.10 Flexible Working Arrangements

SGH supports a diverse and inclusive workforce and recognises that flexible working arrangements that are outside of the traditional full-time work structure may be required either

by an individual employee or the business. Flexible working arrangements are available to employees who have completed at least 12 months continuous service, and includes casual employees who have had regular employment for at least that period and have a reasonable expectation of continued work unless negotiated as part of your employment contract.

Examples may include:

- Changing hours of work.
- Changing patterns of work.
- Changing duration and times of breaks.
- Changing days of work.
- Changing how work is performed.
- Changing where work is performed e.g. work from home arrangements.

Making a request for flexible work arrangements

You are required to put a request for flexible working arrangements in writing to your Manager and include what changes you are seeking and the reasons for requested change. This may include one or more of the following circumstances:

- You are the parent, or you have responsibility for the care, of a child who is of school age or younger.
- You are a carer (within the meaning of the Carer Recognition Act 2010).
- You have a disability.
- You are 55 or older.
- You are experiencing violence from a member of your family, or
- You provide care or support to a member of your immediate family, or a member of your household, who requires care or support because the member is experiencing violence from the member's family.
- You are pregnant.

SGH may also request you to consider flexible work arrangements where business operations require flexibility.

Approving or refusing requests

After receiving a request for flexible working arrangements from you, your Manager will discuss the request with you to try and reach an agreement and provide a written response within 21 days advising of whether the request is approved or refused.

Approving a request

If your Manager approves the request for flexible working arrangements, the request and approval letter will be retained on your personnel file as a variation to your employment agreement.

Refusing a request

SGH may refuse a request for flexible working arrangements only on reasonable business grounds, which may include, but are not limited to the following reasons:

- The proposed arrangements would be too costly for the business to implement.
- There is no capacity to change the current working arrangements of other employees to accommodate the new working arrangements requested.
- It would be impractical to change the working arrangements of other employees, or recruit new employees, to accommodate the new working arrangements requested by you.
- The new working arrangements requested by you would be likely to result in a significant loss in efficiency or productivity, and/or
- The new working arrangements requested by you would be likely to have a significant negative impact on customer service.

Accommodating requests

If your request for flexible working arrangements cannot be accommodated on the terms requested, SGH may discuss options for an alternative flexible working arrangement which the organisation can reasonably accommodate having regard to all of the circumstances.

Status of a flexible working arrangement

Unless SGH specifically agrees otherwise, a flexible working arrangement does not amount to a permanent variation to your terms and conditions of employment. SGH will have the right to monitor, review, change and even terminate the flexible working arrangement at any time on reasonable business grounds. As far as reasonably practicable, SGH will consult with you prior to any variation or termination of an arrangement. SGH will endeavour to give you reasonable notice of the change.

A flexible working arrangement may result in a reduction in pay e.g. if less hours are worked overall and/or at the times attracting extra penalties, paid leave e.g. a reduction in weekly hours may affect leave payments and termination pay e.g. redundancy and notice payments will be calculated on pay rates as at termination date.

SGH employees utilising flexible working arrangements will be treated no less favourably than any other employee. Flexible working is not a barrier to promotion or supervisory responsibilities.