

08-October-2020

To Whom it May Concern,

Happy State High School (HSHS) has requested a review of their workplace health and safety policy and report on our findings. The following report outlines our findings and recommendations.

Legal Requirements

The current legal framework for Queensland's work health and safety is set by the Work Health and Safety Act 2011. HSHS policy currently references the outdated Workplace Health and Safety Act 1995. As per AS/NZS4801:2001, effective implementation of an OHS system should seek to ensure the organisation complies with relevant OHS legislation, standards, and codes of practice. There shall be an occupational health and safety policy authorised by the organisation's top management and shall "include a commitment to comply with relevant OHS legislation and with other requirements placed upon the organisation or to which the organisation subscribes" (AS/NZS4801:2001 S4.2). It should be the responsibility of the Workplace H&S Officer (or those responsible for the HSHS WH&S Policy) to monitor updates and changes in legislation, regulations, standards etc. to ensure that the policy complies with the most correct and current legal requirements.

Hazard Identification and Risk Control

The current HSHS H&S Policy does not identify known hazards to health and safety or contain procedures for risk assessments and control measures. As per current legal guidelines, HSHS must establish, implement, and maintain documented procedures for hazard identification, hazard/risk assessment and control of hazards/risks of activities, product, and services over which they have control or influence. HSHS must develop its methodology for hazard identification, hazard/risk assessment and control of hazards/risks, based on their operational experience and commitment to eliminate illness and injury within the school.

There are various way HSHS can gather information regarding hazards in the school environment, including carrying out hazard inspections or walk around audits, reviewing easily accessible information, such as incident reports, sick leave records, the first aid register, the injury register etc., or issuing a hazard survey to staff and students.



Regular inspections or walk around audits is a good way to identify physical hazards in the school and is recommended to be carried out on a regular basis, approximately once a term. They should also be carried out after:

- an OHS incident
- changes in the way work is done
- changes in work procedures, and
- changes in the layout or design of a work area.

The findings of these inspections should be recorded and developed into an action plan to address the risks identified.

Yours Sincerely,

Kayla Watson

HAPPY STATE HIGH SCHOOL WHS POLICY AND PROCEDURES

WORKPLACE HEALTH AND SAFETY POLICY SCHOOL POLICY

PREAMBLE: Workplace Health and Safety is an important component of a safe and caring community. In a time of rapidly changing technology all school community members are responsible for conscientiously displaying safe work practices.

THE COMMITTEE: Happy State High School's Workplace Health and Safety Committee is comprised of:

- All Workplace Health and Safety Officers,
- The Business Services Manager,
- One Member of the Administration team
- One Head of Department (preferably from a practical curriculum area) and
- The Principal or delegate

The committee fulfils the functions described in the Workplace Health and Safety Act with respect to increasing safety awareness, encouraging safe practices and advising the Principal of in-service and other needs.

The committee is convened by the Workplace Health and Safety Co-ordinator who is appointed by the principal.

STAFF and VISITORS: All staff within the school will implement Workplace Health and Safety policies, procedures and practices that are relevant to their facilities, activities and curriculum. All persons entering the school campus have a responsibility to report all hazards immediately to the Business Services Manager and/or the relevant Head of Department.

STUDENTS: Under the Act students have a legal responsibility to follow all safety instructions. Students can be liable under the Workplace Health and Safety Act for unsafe actions.

CONTACTS: General information and issues should be given to or may be obtained from the Business Services Manager or the Occupational Health and Safety Co-ordinator.

THE ACT

The Workplace Health and Safety Act was passed in 1989 and education became a proclaimed industry a few years later. The Act was replaced by a new plain English Act in 1995. This Act was then superseded by the current legislation, Work Health and Safety Act 2001. The Act requires every school to have a Workplace Health and Safety Committee which meets at least four times a year and a trained Workplace Health and Safety Officer.

The Act also sets out the responsibilities or duties of care for people using a workplace.

Duty of a person conducting a business or undertaking

The Work Health and Safety Act 2011 and Work Health and Safety Regulation 2011 states that a person conducting a business or undertaking must ensure, so far as is reasonably practicable, the provision and maintenance of a working environment that is without risks to health and safety.

This includes:

- The provision and maintenance of a work environment without risks to health and safety; and

- The provision and maintenance of safe plant and structures; and
- The provision and maintenance of safe systems of work; and
- The safe use, handling and storage of plant, structures and substances; and
- The provision of adequate facilities for the welfare at work of workers in carrying out work for the business or undertaking, including ensuring access to those facilities; and
- The provision of any information, training and instruction or supervision that is necessary to protect all persons from risks to their health and safety arising from work carried out as part of the conduct of the business or undertaking; and
- That the health of workers and the conditions of the workplace are monitored for the purpose of preventing illness or injury of workers arising from the conduct of the business or undertaking; and
- The means of entering and exiting the workplace and anything arising from the workplace are without risk to the health and safety of any persons.

Duty of Officers

If a person conducting a business or undertaking has a duty or obligation under the WHS Act, an officer of the person conducting the business or undertaking must exercise due diligence to ensure that the person conducting the business or undertaking complies with that duty or obligation.

due diligence includes taking reasonable steps-

- (a) To acquire and keep up to date knowledge of work health and safety matters; and
- (b) To gain an understanding of the nature of operations of the business or undertaking and generally the hazards and risks associated with those operations; and
- (c) To ensure that the person conducting the business or undertaking has available for use, and uses, appropriate safety resources and processes to eliminate or minimise risks to health and safety from work carried out as part of the conduct of the business or undertaking; and
- (d) To ensure that the person conducting the business or undertaking has appropriate processes for receiving and considering information regarding incidents, hazards and risks and responding in a timely way to that information; and
- (e) To ensure that the person conducting the business or undertaking has, and implements, processes for complying with any duty or obligation of the person conducting the business or undertaking under this Act; and

Example-

For paragraph (e), the duties under this Act of a person conducting a business or undertaking may include-

- Reporting notifiable incidents
 - Consulting with workers
 - Ensuring compliance with notices issued under this Act
 - Ensuring the provision of training and instruction to workers about work health and safety
 - Ensuring that health and Safety Representatives receive their entitlement to training.
- (f) To verify the provision and use of the resources and processes mentioned in paragraphs (c) to (e).

Duty of workers and other persons at the workplace

The Work health and Safety Act 2011 states that while at work, a worker must:

- Take reasonable care for his or her own health and safety; and
- Take reasonable care that his or her acts or omissions do not adversely affect the health and safety of other persons; and

- Comply, so far as the worker is reasonably able, with any reasonable instruction that is given by the person conducting the business or undertaking to comply with the act; and
- Cooperate with any reasonable policy or procedure of the person conducting the business or undertaking relating to health and safety at the workplace that has been notified to workers.

HAZARD AND RISK MANAGEMENT AT HAPPY STATE HIGH SCHOOL

When student activities are organised within the school area, the HOD and WHSO shall consult and conduct a risk assessment to decide on a method of eliminating the hazard or controlling the risks. The results of this consultation shall be recorded and kept in the classrooms and main office and will be available for any person who would like a copy.

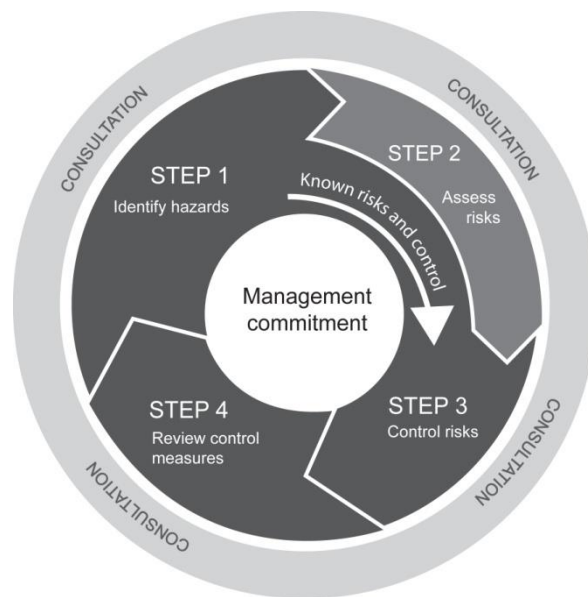


Figure 1. Risk Management Process

The process known as risk management involves the four steps as set out in the Code of Practice – How to Manage Health and Safety Risks at Work.

- Step 1 - Identify hazards – find out what could cause harm
 - The HOD and WHSO, along with relevant staff members, shall walk around the associated area, buildings, and school grounds, assessing potential hazards.
 - Must consider the activities being performed within the area, the behaviours of students and staff, items or substances being used in a normal day-to-day setting within the associated areas.
- Step 2 - Assess risks if necessary – understand the nature of the harm that could be caused by the hazard, how serious the harm could be and the likelihood of it happening
 - Consider the likelihood of potential hazard or scenario resulting in an accident or injury and prioritise measures accordingly.
 - Consider the differing needs of students, such as age, disabilities etc.
 - Risks should be categorised in terms of high, medium, or low risk, and appropriate plans of action should be drawn up in the event of accidents or injuries.
 - Complete a risk assessment with findings.
- Step 3 - Control risks – implement the most effective control measure that is reasonably practicable in the circumstances

- Select control measures in accordance with the “Hierarchy of Risk Control Measures”
 - Elimination – hazards that can be avoided entirely e.g. clean high windows from the ground with extendable pole rather than climbing a ladder
 - Substitution – sometimes a less hazardous activity, substance, or process can be used e.g. use non-toxic glue instead of toxic glue
 - Isolation – separate hazard from people by marking the hazardous area and putting up safety barriers e.g. fencing off area not accessible to students
 - Engineering control – Modifying tools or equipment
 - Administrative control – all staff, students, and visitors must be inducted into the school’s safety policy and be enforced to practice safe work procedures.
 - Personal protective equipment – PPE can protect from hazards associated with class activities such as science experiments e.g. use of safety glasses, gloves, helmets etc.
- Step 4 - Review control measures to ensure they are working as planned.
 - These should help ensure that agreed safe working practices continue to be applied in the day-to-day running of the school premises
 - Any changes to the physical layout of the building and its grounds, significant staffing movements, changes to working policies or targets, and acquisitions of new equipment or facilities should also be used as an opportunity to review risk assessments

Many hazards and their associated risks are well known and have well established and accepted control measures. In these situations, the second step to formally assess the risk is unnecessary. If, after identifying a hazard, you already know the risk and how to control it effectively, you may simply implement the controls.

It is the responsibility of everyone within the school to work/behave in a healthy and safe manner and take all precautions to protect the environment. For this reason, we implement and participate in risk management and consultative processes to identify hazards and discuss actions required to manage their potential risk. All staff are encouraged to identify and control hazards when it is safe and within their ability to do so. Any hazards identified not within their ability to rectify immediately must be reported to the HOD and WHSO immediately.

PROCESSES FOR IMPLEMENTATION OF WORKPLACE HEALTH AND SAFETY AT HAPPY STATE HIGH SCHOOL

By Heads of Department (HODs), BUSINESS SERVICES MANAGER, AND OTHER KEY STAFF

1) INDUCTION PROGRAM FOR STUDENTS

Including safety rules, safe procedures, teaching instructions and record of induction.

2) INDUCTION PROGRAMS FOR STAFF AND VISITORS

Including safety rules, safe procedures, teaching instructions, manuals and record of induction and updates.

3) SYSTEM FOR RECORD OF BREACHES

4) PREPARATION OF RETAINING PROGRAMS

Including retesting and instruction package.

5) ARRANGE RISK ASSESSMENTS FOR ACTIVITIES

Including all hazardous activities and substances (MSDS), possible dangerous known situations, use of facilities, and the provision of first aid kits.

6) THE DOCUMENTING OF STANDARD OPERATING PROCEDURES**PROCEDURES FOR USE WITH STUDENTS****Breaches of Safety**

The industry model of handling breaches is adapted to fit students. The industry model is a four step model:

INDUSTRY MODEL	SCHOOL ADAPTATION
1) Induction and instruction	Induction and instruction
2) Verbal warning	Verbal warning – recorded
3) Written warning	Phone call followed up by written warning sent to parents. Parent interview with HOD.
4) Dismissal or redeployment	Withdrawn from class and review by Deputy Principal / Principal

Following each warning, re-instruction and re-testing is carried out before the employee is allowed to resume duties in that area of the workplace.

The school follows the same procedures with respect to student breaches.

The Heads of Department are responsible for organizing the retraining and testing. The testing also includes a written assurance by the student to act safely. It should be noted that in any case steps may be omitted in serious circumstances. Similar processes will be applied to all staff and visitors.

STEP FOUR (Repeated Serious Breaches)

Preamble:

The fourth step in the procedure for implementing the enforcement of WHS in the school matches the industrial model of the dismissal or redeployment step. It reflects the seriousness of the events to date. If possible it also allows for the student to return in the future when they have demonstrated a change in behaviour.

Stage One: The student is referred to the Head of Department for a breach of safety after having received written warning.

The HOD	1) Verifies the incident/s and records details 2) Sends home letter to parents and phones them 3) Forwards a copy of letter to WHSO and Deputy Principal (DP) 4) Organizes supervision of student until Principal advises otherwise.
The DP	1) May request a meeting of OHSC to review events and make recommendations to the Principal. 2) May ask the student or the parent to make a submission. 3) Arranges meeting with parents, student and HOD 4) Checks documentation of safety offences provided by HOD 5) Considers seriousness of events and breadth of offences. 6) Make recommendation to the Principal on:

	a. Length of time out of practical area (e.g. rest of semester, rest of year, one year) b. Whether the student should be withdrawn from other subjects. c. Any other conditions for return to normal class and d. The approximate date for a review meeting. 7) Send a brief summary of the reasons for the recommendations with them to the Principal.
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The HOD The DP and HOD following the meeting with student, parent and HOD sets the parameters to be used for determining whether a return to practical area/s is warranted (e.g. report from teachers on behaviour in other classes, report on behaviours in playground, report on behaviour in other practical areas).

Stage Two: Restrictions on the Student

- 1) Action under the Responsible Behaviour Policy may be taken separately.
- 2) Until the student meets the criteria for the return to practical area no subject changes will be allowed.
- 3) The behaviour during withdrawal period should be considered by the HOD or DP as per Responsible Behaviour Policy.

OTHER IMPORTANT DOCUMENTS

- The Act and Regulations (Work health and Safety Act 2011)
- Codes of Practice (Now in Regulation [Miscellaneous] part 8) Some revised as Industrial Codes of Practice or Advisory Standards.
 - Manual Handling
 - Hazardous substances (Now in Regulations parts 9 & 13 and Regulation [Miscellaneous] part 17)
 - First Aid in the Workplace
 - Use and Selection of Personal Protective Equipment
 - How to Manage Health and Safety Risks at Work
- Electrical Safety Act 2002
- Dangerous Goods Management Act 2001