

POLICY C25.4

HEALTH, SAFETY AND FIRST AID IN THE WORKPLACE

1.0 INTRODUCTION

1.1 Context

In the provision of their business, including higher education, vocational education and bespoke courses for industry, Scentia and its subsidiaries, the Australasian College of Health and Wellness Pty Ltd (ACHW), the Australian Institute of Management Education and Training Pty Ltd (AIM) operating as AIM Business School (ABS), and AIM VET, a Registered Training Organisation (RTO), (collectively ‘the Scentia Group’) and Third-Party Partners (TPP) ensure that the health and safety of students, Workers (defined by legislation as employees [staff], contractors, agency staff, labour hire staff, people on work experience, sub-contractors, volunteers, trainees and outworkers), and visitors is protected and that students and Workers receive competent assistance immediately following injury or illness. The Scentia Group and TPPs consider health and safety a high priority and integral to all activities.

This policy complies with the Work, Health and Safety Act (2011) and Regulations (including the Work, Health and Safety (First Aid in the Workplace) Code of Practice 2015), and the Higher Education Standards Framework (2021) Domain 2, Section 2.3. *Wellbeing and Safety*.

1.2 Purpose

This policy outlines the legislated responsibilities and the principles that govern health, safety and first aid at all locations encompassing the Scentia Group, including online or face-to-face interaction, on TPP locations, and in external clinics attended by students and Workers.

1.3 Scope

This Policy applies to all students and Workers (defined by legislation as employees [staff], contractors, agency staff, labour hire staff, people on work experience, sub-contractors, volunteers, trainees, and outworkers) of the Scentia Group and TPPs.

This policy applies to all facilities used by the Scentia Group and TPP’s, including physical offices, campuses, hired premises and online operations and learning environments. It also applies to the external clinics ACHW uses for the teaching of clinical skills.

1.4 SCOPE EXCEPTIONS

Harassment (including sexual harassment) and Sexual Assault is managed through the Bullying, Harassment and Discrimination Policy and Procedure and the Sexual Assault and Sexual Harassment Prevention and Response Policy and Procedure.

2.0 RESPONSIBILITIES

1. NOTE: Legislation requires that none of the following responsibilities may be delegated.
2. **Everyone** has a duty of care to ensure the safety of themselves and others.
3. **Each organisation within the Scentia Group, and TPPs** has the primary duty of care for all health, safety and access to first aid within their organisation, as is reasonably practicable.
4. **Officers** (as defined under Corporations Act 2001) of each organisation in the Scentia Group and TPPs include board members, directors, executive team and managers whose decision-making has the capacity to affect a substantial part of the business or the financial standing and reputation of the organisation. Officers have a duty to exercise due diligence to ensure the organisation complies with its obligations. Officers are required to:
 - understand the nature of their organisation’s operations and associated risks and hazards and verify that those risks and hazards are being appropriately controlled;
 - allocate appropriate resources, including for first aid, for the identification, elimination, or control of those risks / hazards and to enable first aid, effective consultation, incident notification and other required processes; and
 - maintain knowledge of health and safety laws and compliance requirements.
5. **Workers** are the academic staff, non-academic staff, contractors, agency staff, labour hire staff, people on work experience (where applicable), sub-contractors, trainees, volunteers, outworkers and others who work within the organisation. They have a duty to take reasonable care and to:
 - care for their own health and safety and that of others;
 - comply with any reasonable instruction; and
 - comply with this policy, its procedure, and any other relevant policy and procedure, instruction, and direction.
6. **Students** are students enrolled in the courses provided by the Scentia Group and TPPs. Students have a duty of care to ensure their own health and safety and that of others, and are responsible to comply with this policy and its procedure, as well as other relevant policies and procedures, instructions and directions.

7. Specific Responsibilities

Some staff have specific responsibilities under legislation and this policy, as follows:

- a. The **Chief Executive Officer** is responsible to:

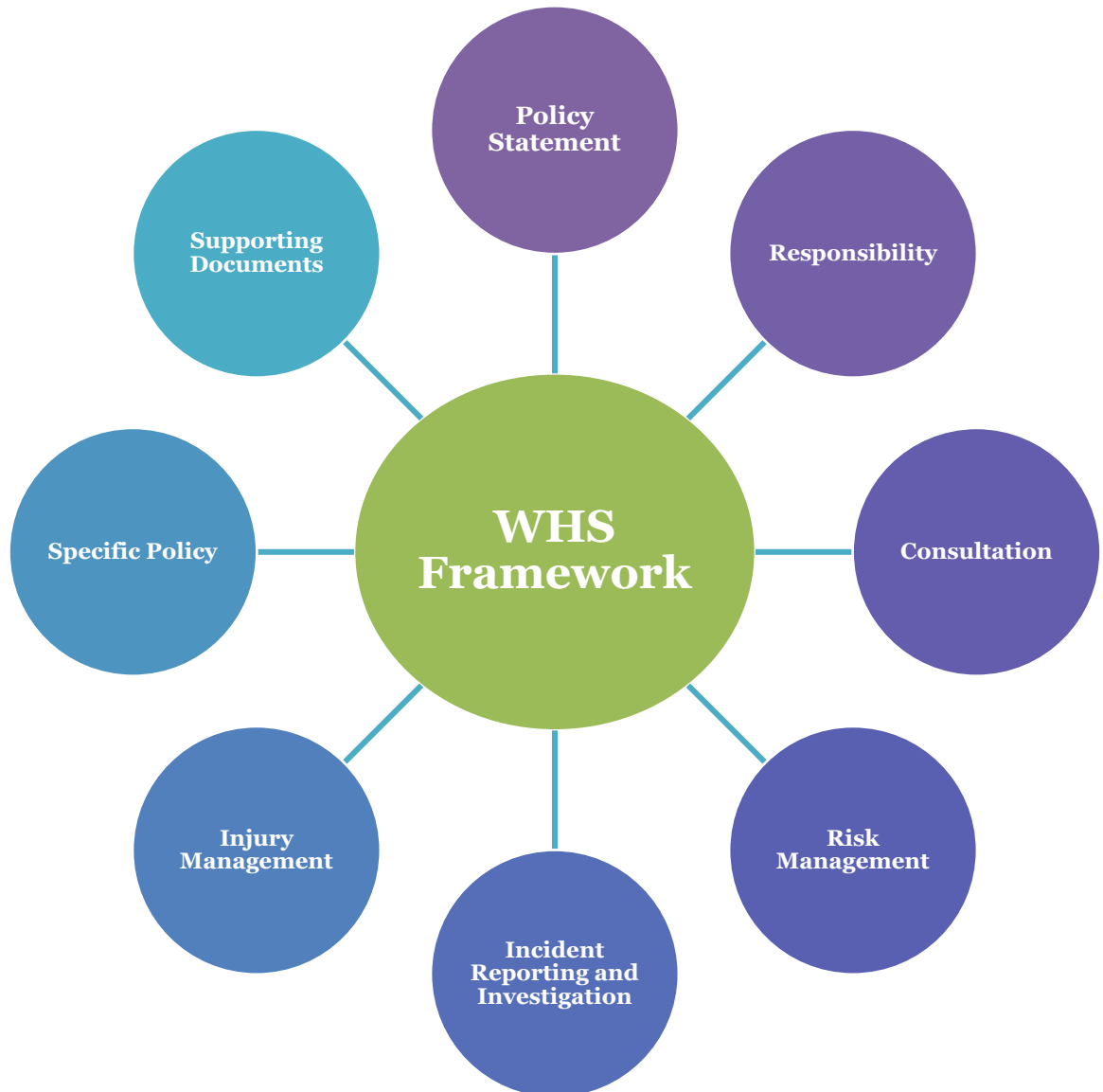
- ensure that the Scentia Group has in place effective health and safety policies, procedures and systems (including first aid and risk management systems) for the health, safety and well-being of Workers, students and others affected by its operations;
 - actively demonstrate leadership in health, safety and well-being policy, and risk management;
 - provide first aid equipment and ensure each worker at the workplace has access to the equipment;
 - ensure access to facilities for the administration of first aid; and
 - ensure that an adequate number of Workers are trained to administer first aid at the workplace or that Workers have access to an adequate number of other people who have been trained to administer first aid.
- b. **The Executive Leadership Team** are responsible to:
- implement this policy and procedure and the risk management framework in their organisation/department;
 - provide strategic health and safety direction;
 - monitor health and safety performance in their organisation/department; and
 - actively demonstrate leadership in health, safety and wellbeing policy and risk management.
- c. **Executive Directors** are responsible to:
- ensure the health, safety and well-being of students, Workers and visitors within their organisation/department, including vaccination of students against Hepatitis B before they attend clinics (Head of School, ACHW), and access to first aid;
 - identify, assess, and control any hazards and risks associated with the organisation's /department's/TPP's/external clinic's activities (education, training and other); and
 - actively demonstrate leadership in health, safety and first aid policy and risk management.
 - establish processes and procedures to meet the organisation's obligations for the health and safety of students; and
 - maintain appropriate health, safety and injury/incident records related to the student cohort, including a *Student Incident Register*.
- d. **Head of Academics, Unit Convenors, Facilitators and Trainer and Assessors** are responsible to:

- provide students with training and guidance on workplace health and safety and access to first aid;
 - ensure the work they are responsible for is carried out according to this policy and its procedure, other relevant policies and procedures, and risk management processes;
 - monitor the health, safety and well-being of Workers, students, and visitors in their organisation/department;
 - for ACHW: monitor the health, safety, and well-being of students in external clinics and ensure training and induction on potential hazards in that environment; and
 - demonstrate leadership on health, safety, and injury management issues.
- e. **Head of People and Culture** is responsible to:
- establish processes and procedures to meet the organisation's obligations under workplace health and safety legislation and regulations; and
 - maintain health, safety, and injury/incident records of Workers, including the *WHS Hazard, Incident and Injury Register*.
 - provide or source first aid training and maintain and promote names of first-aiders across the Scentia Group.
- g. **Facilitators and Training and Assessors** are responsible to report student incidents to the Executive Director
- h. The **ACHW Executive Director and ACHW Clinic Coordinator** are responsible to maintain the Student Incident Register for ACHW's External Clinics.
- i. **TPPs** are responsible to maintain their own Student Incident Register and provide it to the ACHW Head of School as incidents occur.
8. Procedural responsibilities are outlined in the Health, Safety and First Aid in the Workplace Procedure, and in the External Clinics Procedure where procedures relate to ACHW external clinics.

3.0 POLICY

3.1 Principles

1. The Scentia Group’s framework for health, safety, and injury management is as follows:



2. The Scentia Group is committed to the health, safety and wellbeing of all people who study, work at, or visit its organisations through the provision of a safe and supportive environment for its students, Workers (employees, contractors, agency staff, labour hire staff, people on work experience, sub-contractors, volunteers, trainees, and outworkers), visitors and others, and demonstrates this by:
 - a. providing a comprehensive suite of policies and procedures which include:
 - this Health, Safety and First Aid in the Workplace Policy and Procedure;
 - the Infectious Diseases and Infection Prevention and Control Policy and Procedure;
 - the External Clinics Policy and Procedure, and ACHW's suite of clinic-related manuals, frameworks, procedures, and standards to inform students and staff of ACHW; and
 - the Rehabilitation and Return to Work Policy and Procedure.
 - b. identifying hazards, assessing risk and implementing control strategies to minimise risk to people and property;
 - c. designing, purchasing, hiring, installing and maintaining safe sites and machinery;
 - d. providing first aid training for staff and access to first aid equipment;
 - e. promoting psychological safety through its people leaders;
 - f. ensuring protection from cyber bullying and harassment, and maintaining security of online access and communications;
 - g. ongoing development and improvement of its health, safety and first aid systems with a focus on identification, control or elimination of hazards and risks, and competent first aid prior to accessing qualified medical assistance;
 - h. observing, implementing, and fulfilling the requirements of legislation, relevant regulations and codes, policy and procedure;
 - i. encouraging and facilitating ongoing and active dialogue and consultation around health, safety, psychological safety and first aid management with all persons involved in Scentia Group activities;
 - j. ensuring Workers and contractors receive the appropriate health and safety information and training to enable them to conduct their work safely;
 - k. ensuring that policies, procedures, and standards for clinic-based teaching environments are complied with;

- l. having leaders lead by example, demonstrating a visible commitment to health, safety, and immediate injury management to motivate, educate and support managers, staff, and students;
 - m. the ongoing monitoring, reporting, review and improvement of health, safety and first aid systems; and
 - n. ensuring all levels of management, Workers and students are aware of and carry out their legislated health and safety responsibilities.
3. Students entering ACHW courses where clinical content is included, are informed at admission that mandatory Hepatitis B vaccination is required before attending clinics.
4. Orientation of new students, including at TPPs, includes health and safety information and training.
5. Orientation of ACHW students attending external clinics, additionally includes information and training on equipment and specific hazards such as lasers, needle-stick, and light-based technologies.
6. Orientation and induction of Workers includes health and safety and psychological safety information and training, including at TPPs.
7. The Scentia Group is proactive in its approach to health, safety and first aid. It ensures:
 - there is first aid available and medical intervention (as required);
 - injuries are reported to insurers in a timely manner;
 - there is effective review of incidents and accidents to implement preventive measures and continuous improvement.
8. The Scentia Group welcomes:
 - suggestions for improvement of health and safety work practices, policy, procedures and resources;
 - participation in meetings to consult and inform on health and safety issues; and
 - any other contributions its Workers, students and visitors can make to improving health and safety.
9. Complaints or grievances that relate to decisions made under this policy and its procedure should be made under the Staff Grievances and Complaints Policy and Procedure, or the Student Grievances and Complaints Policy and Procedure, whichever applies.

3.2 Privacy, Confidentiality and Record Keeping

1. All parties involved in any resolution or grievance process must maintain confidentiality at all times. They should not:
 - publicly make allegations,
 - defame the alleged offender,
 - reveal the names of those making a grievance, or
 - refer to those involved, without the express permission of those concerned.
2. All information will be managed in accordance with Scentia's Privacy of Student/Staff information and Records policies and the privacy conditions in other relevant policies and procedures.
3. Records of incidents and the outcomes of the investigation, along with the relevant incident register - the Student Incident Register or the Work Health and Safety Hazard, Incident and Injury Register - will be kept in strictly confidential files for 7 years. Parties to the incident will be allowed supervised access to these records on request.
4. Management of, and access to, any records (including relevant registers) will be restricted to the Executive Director, Head of People and Culture and CEO.

3.3 Reporting and Monitoring

1. The Student Welfare Committee monitors student incidents relating the WHS by reviewing the Student Incident Register and makes recommendations to the WHS Committee on matters relating to WHS.
2. The Work Health and Safety Committee (WHS Committee) regularly monitors de-identified reports on hazards, incidents and resolutions for the purpose of making recommendations to changes to processes and policies and identifying emerging risks.
3. The Audit and Risk Committee receives quarterly reports from the WHS Committee to enable the identification and monitoring of risk, including the effectiveness of control measures in place.
4. The Corporate Board receives reports from the Audit and Risk Committee on:
 - a. Incidents, outcomes of investigations and actions taken.
 - b. Implementation of the prevention and support plan including compliance with positive duty.
 - c. Required changes to policies or to training.

4.0 DEFINITIONS

- **Consequence** - The specific effect of an incident/event.
- **External Clinics** - clinics not owned by ACHW which ACHW has an agreement with to use the clinic's facilities for teaching specific clinical skills.
- **First aid** - 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.
- **First aider** - a person who has successfully completed a nationally accredited training course or an equivalent level of training that has given them the competencies required to administer first aid.
- **First aid equipment** - includes first aid kits and other equipment used to treat injuries and illnesses.
- **First aid facilities** - include first aid rooms, health centres, clean water supplies and other facilities needed for administering first aid.
- **Hazard** - a source of potential harm or a situation with the potential to cause harm to people, property, or the environment.
- **Likelihood** - A measure of whether the consequences of an incident/event will happen.
- **Psychological safety** - Involves creating an environment where individuals feel comfortable expressing themselves, taking risks, and sharing their ideas without fear of reprisal or judgment.
- **Risk** - A risk is the chance of something happening that will have an impact on strategic objectives. It is measured in terms of consequences and likelihood. In the health and safety context, risk should be thought of as the health and safety consequence of a given severity, and the likelihood of that particular consequence occurring.
- **Students** - All individuals enrolled in an education program with a member of the Scentia Group, or TPP, either online, in face-to-face mode or in blended delivery.
- **Third-Party Partner (TPP)** - an organisation, other than ACHW, providing education services to students on behalf of ACHW, such as delivering an ACHW unit or course.
- **Workers** - are defined in the Work Health and Safety Act (2011) as those who 'carry out work for a person conducting a business and include employees, contractors, agency staff, labour hire staff, people on work experience, sub-contractors, trainees, volunteers and out-workers'.
- **Work Health and Safety Act (2011)** - The (Commonwealth) Work Health and Safety Act implements the Model Work Health and Safety Act in the Commonwealth jurisdiction, helping to form a system of nationally harmonised

work health and safety laws. The (Commonwealth) Work Health and Safety Act was passed in Parliament on 24 November 2011 and received Royal Assent on 29 November 2011.

- **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.

5.0 REFERENCES AND ASSOCIATED INFORMATION

- ACHW Clinical WHS Manual
- ACHW Clinical Quality Assurance Framework
- ACHW Equipment Procedures
- ACHW External Clinics Policy and Procedure
- Alcohol and Drugs Policy
- Australian Laser Safety Standards
- Bullying, Harassment and Discrimination (Staff and Students) Policy
- Critical Incidents Policy
- Health, Safety and First Aid in the Workplace Procedure
- Higher Education Standards Framework (2021)
- Infectious Disease and Infection Prevention and Control Policy
- Rehabilitation and Return to Work Policy
- Sexual Assault and Sexual Harassment Policy
- Staff and Student orientation and induction programs
- Staff Code of Conduct
- Staff Grievances Policy
- Student Incident Register
- [State-based Work, Health and Safety Acts and Codes](#)
- Student Code of Conduct
- Student Grievances and Complaints Policy and Procedure.
- Work Health and Safety Act (2011) (Commonwealth) and Regulations
- Work Health and Safety (First Aid in the Workplace) Code of Practice 2015
- Work Health and Safety (WHS) Hazard, Incident & Injury Report

- Work Health and Safety Hazard, Incident and Injury Register
- Governance Manual
- Delegations of Authority Policy and Procedure
- Risk Management Policy

6.0 POLICY OWNERSHIP

Policy Owner	Chief Executive Officer (CEO)
Status	Reviewed on December 2023
Approval Authority	Scentia Corporate Board, with endorsement by ACHW and AIM Corporate Boards
Date of Approval	13/12/2023
Effective Date	13/12/2023
Implementation Owner	Head of People and Culture
Maintenance Owner	Head of Compliance
Review Due	December 2026
Content Enquiries	Liz Douglas - Head of People and Culture Email: ldouglas@scentia.com.au Executive Director for students if required.

7.0 AMENDMENTS

Version	Amendment Approval (Date)	Amendment Made By (Position)	Amendment Details
C25.0	10 July 2017	Head of Compliance / Director ACHW	Initial document review after purchase of MHMHE
C25.1	10 March 2020	ACHW and ABS Academic Boards	General review
C25.2	18 January 2021	Academic Board	Added that vaccination against Hepatitis B is compulsory for all students before they attend clinics.
C25.3	21 October 2021	Scentia Corporate Board	Policy and Procedure separated. New proforma. Became a Scentia Group policy applying across the Scentia group, with the new title Health, Safety and First Aid in the Workplace, incorporating

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			<p>and replacing the following policies:</p> <ul style="list-style-type: none"> • Scentia Work, Health and Safety Policy July 2020 • ACHW Policy 20200118v3 Work, Health and Safety Policy January 2021 • AIM/ABS Work, Health and Safety Policy March 2021. <p>Injury management, return to work, and rehabilitation clauses removed, but retained in the revised Scentia corporate policy Rehabilitation and Return to Work.</p>
C25.4	13/12/2023	Scentia Corporate Board	Added reference to Psychological Safety and reference to the WHS Committee