

Policy

Synod Wide WHS Framework

D/1.1

Rationale

In response to the call of Christ, in the light of the Gospel and in accordance with the *Basis of Union*, the Uniting Church in Australia, Queensland Synod is committed to Uniting in Christ, Acting with Love, Living with Hope, Witnessing in Faith and Working for Justice. To engage in this work will always be a risky undertaking, yet we are called into the mission of God in the world; Jesus says, "Come, follow me" (Mark 1:17).

This framework positions the church to consider the nature of the work health and safety risks that we face as we bear witness to Christ's call. As part of the *Together on the way, Enriching Community* journey, the Queensland Synod has committed to being organised for mission. This statement identifies an inevitable tension in the life of the church; as the body of Christ, the church is a movement dedicated to the mission of God. But as part of this world, the church is formed and bound by structures which are necessary so that the mission may prevail.

Matthew 25:14–30 calls us to be wise stewards of that which God has given us. Such stewardship includes protection of the people and property of the church from damage, destruction, theft, or other loss. The prudent see danger and take refuge, but the simple keep going and pay the penalty (Proverbs 22:3).

With respect to compliance, we are called on to submit to government authorities (1 Peter 2:13–14). One way we can submit to this authority is to comply with the laws of our country. We need to be vigilant in ensuring that we act in compliance with the laws that apply to the church.

The Gospel imperative to be diligent, respectful stewards is clear. If we are not intentional about identifying, prioritising and managing work health and safety, we are open to the accusation that we merely listen to God's word but do not do what it says (James 1:22).

Purpose

To provide a framework for the Queensland Synod to manage its Workplace Health and Safety (WHS) obligations and to provide a consistent and systematic approach across the Synod. This will be achieved through the provision of a flexible and legislatively compliant Work Health and Safety Management System, consistently embedded across each organisation of the Queensland Synod as well as a culture of zero tolerance for uncontrolled foreseeable risks.

This framework puts in place processes which are aligned to AS/NZS 4801:2001 *Occupational Health and Safety Management Systems*¹; emphasises the interconnectedness of WHS with financial and organisational objectives; and promotes improved integration of WHS concerns into strategic and business decisions.

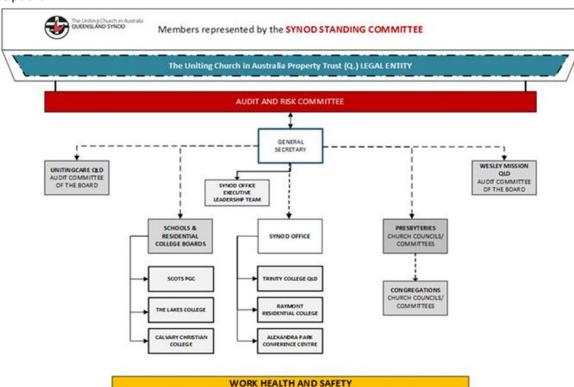
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¹ At this stage AS/NZS 4801 remains the current industry standard



Scope

This policy statement and associated framework applies to all entities across the Uniting Church in Australia, Queensland Synod and their respective employees, ministry agents, volunteers, contractors and visiting members of the public.



It is acknowledged by the Queensland Synod that there are well developed WHS Management Systems in place in a number of entities.

Policy Statement

The Uniting Church in Australia, Queensland Synod through the Synod Standing Committee and, by virtue of the legislation, through the Uniting Church in Australia Property Trust (Q.) recognises its obligation to provide and maintain a safe and healthy environment for all who come into contact with the church, its entities, facilities and their related activities. This includes, but not exclusively: workers (including contractors and volunteers), church members, students, clients, visitors and members of the public.

The objectives of the Synod's Work Health and Safety Policy and Framework include:

- Promote health and safety as a value that underpins the way we work in order to operate without injuries, illnesses or incidents
- Provide for a workplace where risks to health and safety are managed to protect workers' health, safety, psychological and social wellbeing
- Provide for a culture of engagement, collaboration and consultation to ensure hazards are identified and the risks associated with them eliminated, if possible, or minimised as far as is reasonably practicable and
- Comply with relevant WHS legislation and Australian Standards.

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The above objectives will be achieved through the adoption of the Synod-wide Work Health and Safety Framework developed in alignment to AS/NZS 4801 "Occupational Health and Safety Management Systems".

Individual entities are expected to:

Provide leadership, support, direction and resources to establish a sustainable work health and safety management system

- Implement a WHS governance framework in a consistent and systematic manner, to deliver compliance with all relevant health and safety legislation, best practice standards and other requirements relevant to its activities
- Define and describe the health and safety expectations, accountabilities, responsibilities, obligations and culture to deliver a sustainable, safe and healthy environment
- Establish measurable objectives and targets to facilitate continual WHS improvement, in addition to periodical reviews and audits of the WHS management system
- Provide for transparent monitoring, reporting and escalation of Work Health and Safety matters on a timely basis to the respective councils/board
- Demonstrate commitment to prompt rehabilitation of employees should a workplace injury or illness occur.

This framework provides for councils, boards and governing bodies (however called) to report to the Synod Audit and Risk Committee (ARC), which has the delegated responsibility to monitor WHS performance on behalf of the Synod Standing Committee.

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Queensland Synod WHS Framework

AS 4801 "Occupational Health and Safety Management Systems" includes the following principles:

In Principle	In Practice				
	Decide, commit and communicate the WHS vision, where this might encompass:				
	 Developing policies, procedures and plans, in consultation with workers, that support enduring WHS 				
	outcomes for the business or undertaking				
Policy	 Document control and review 				
	 Providing the necessary resources for success 				
	 Driving WHS outcomes through leadership at all levels of the organisation 				
	Set WHS goals to be achieved and plan for their success, through:				
	 The allocation of responsibility and accountability for WHS outcomes 				
	 Consultation 				
Planning	■ Specific WHS programs				
riaiiiiig	 Training 				
	Reporting				
	 Communication, information and awareness 				
	Where the WHS policies, procedures and plans are in place and effective, evidence of this might include:				
	 Hazard identification arrangements 				
	 Risk assessments 				
	Risk control				
	Emergency management				
Implementation	 Injury management and return to work 				
	 Supervision 				
	 Training 				
	 Reporting 				
	 Communication, information and awareness 				
	Routinely measuring WHS outcomes against agreed goals, including:				
Measurement	Audits				
and evaluation	Reviews				
and Evaluation	■ Incident data				
	 Registers and records 				
Management	Undertake continuous performance evaluation and improvement, where this might include:				
review	Evaluate performance against targets				
ICVICW	 Develop new and review existing plans for continuous improvement 				
	WHS governance arrangements ensure WHS Risks are managed and WHS Processes are implemented				
	which may include:				
Governance Oversight	 Organisational structures, management roles and the scope of authority and accountability they 				
	exercise for their tole in implementing the WHS System				
	Established frameworks for making decisions				

The Synod's WHS Framework is aligned to *AS 4801:2001 Occupational Health and Safety Management Systems*; and is underpinned by the following four key components to guide and/or complement entities in the management of WHS in their respective businesses. Each entity is responsible to reflect the WHS issues relevant to their organisation.

It is recognised that there may be variances with how WHS is managed because of specific operational focus and environmental aspects such as size and scale, geographical location, culture, demographics and available resources. It is also acknowledged that some entities may choose to use an Integrated Business Management Systems Model.

The four stated key components of the Synod's WHS Framework are underpinned by a risk-based, centre-led approach that incorporates the following:

- Leadership commitment and safety culture
- Operational planning and control
- WHS assurance and governance
- Evaluation and continuous improvement

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Each of the key components are considered interrelated, in that the absence or ineffectiveness of one will undermine the effectiveness of the WHS Management System, as well as the incorporation of principles of continuous improvement.

Key Component 1: Leadership Commitment and Safety Culture

We recognise that leadership, culture and ethical behaviour are critical to implementing a strong WHS governance framework.

Senior management/senior leaders/executives are accountable for overall leadership, commitment, and resource allocation to enable the WHS Framework to be implemented effectively by:

- Providing safety leadership and promoting personal responsibility of every individual for their own and other's health and safety
- Demonstrating strong and active leadership from the top: visible, active commitment from the governing body
- Establishing effective 'downward' communication systems and management structures
- Integrating sound health and safety management with business decisions
- Defining and describing health and safety expectations, accountabilities, responsibilities, obligations and duties to deliver a sustainable safe and healthy environment
- Commitment to implementing a governance framework that delivers compliance with all relevant health and safety legislation
- Promoting a proactive safety culture
- Establishing measurable goals and objectives to enable continuous improvement
- Ensuring consultation is an ongoing process in applying risk management principles
- Aligning the roles and responsibilities within the organisation's structure to the three lines of defence model, which is incorporated within its risk management, compliance and internal audit approach i.e:
 - The first line of defence relates to activities undertaken by operational management who has ownership, direct responsibility and accountability for controlling and mitigating risks.
 - The second line of defence consists of activities relating to oversight and governance of key organisational functions.
 - The third line of defence consists of independent assurance providers.

Leadership and Safety Culture - Leaders promote a positive culture for health and safety

Managerial behaviour is recognised as a key aspect of WHS organisational culture. The underlying values and observable behaviours of managers are influential in shaping organisational cultures and WHS performance.

It is recommended to focus on generating the appropriate leadership skills and workforce capability to foster a safe and constructive business, e.g.:

- Visibility lead by example, participate in WHS activities
- Relationships engage in two-way communication with workforce, listen and respond
- Workforce involvement actively involve workers in work planning and decision making
- Proactive behaviour proactively seek to improve WHS, promote hazard and incident reporting
- Look to create and manage change in the pursuit of a safer, more controlled environment
- Influence to manage staff gain an understanding of internal stakeholders, what their goals are, what motivates them and then appeal to those needs to achieve safety goals.

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Safety Culture (Consult, Communicate, Collaborate)

The Synod body is committed to and supports a transparent WHS risk aware culture. This WHS Management Framework aims to embed a WHS risk-aware culture where everyone within the Synod is conscious of how their decisions impact on the ability of the Synod Body to achieve its objectives.

A positive cultural awareness of WHS risk contributes to efficient decision making where the Synod Body has the capability to manage WHS risk as and when it occurs by supporting:

- The continual development of the leaders and cultural maturity
- Individual and organisational compliance with the requirements of the WHS Management System through the articulation of roles and responsibilities and the provision of information, training and other resources.

Key Component 2: Operational Planning and Control

WHS Risk Management

Operational controls are the key requirements of the WHS Management Framework which facilitate effective and efficient WHS Risk management. These include a WHS Risk register or incorporation of WHS risks in a more generalised operational risk register, local WHS management procedures, training and the management of WHS issues and breaches.

The WHS risk management process provides structure for the identifying, assessing, treating, monitoring, reviewing, recording and reporting of WHS risk.

Management of WHS risks will include the following matters to ensure compliance with legislative requirements:

- Initial reports of WHS incidents/hazards and near misses
- Assessment of hazards and risks in accordance with the Synod body's risk management frameworks using the WHS category of the risk likelihood and consequence tables
- The elimination of WHS risks if reasonably practicable: Otherwise they must be minimised to the lowest level of risk possible in all the circumstances
- When identifying control measures for WHS risks, the hierarchy of controls must be considered in accordance with Queensland WHS legislation.

Hazards and risks are systematically identified, assessed, controlled and monitored through:

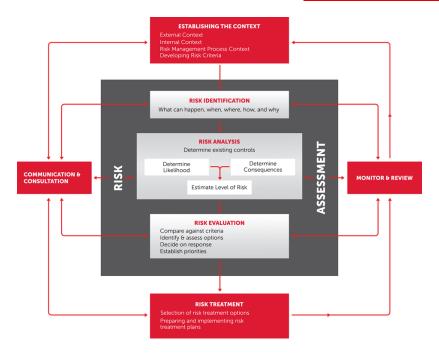
- Synod bodies planning and implementing systematic WHS risk management based on their priorities and needs
- Proactive implementation of the WHS risk management cycle
- Substantiating systematic risk management, including management of change, outsourcing, procurement and contractors
- The identification and prioritisation of key risks no less than annually and/or whenever a significant business decision is made

The risk management process provides structure for the assessing, treating, monitoring, reviewing, recording and reporting of risk. The risk management process is set out in the figure below.

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WHS Risk Management Controls

WHS controls cover three broad types of WHS hazards: technical, cultural and governance issues (see figure below).

These form interconnected pillars to underpin the effective management of WHS by ensuring:

- Sound WHS hazard identification and risk management is conducted by management in appropriate consultation with workers
- Strong leadership within a robust safety culture
- Effective mechanisms of WHS oversight and control.



Healthy and safe by design - Hazards are eliminated or minimised by the design

- Structures, plant and substances are designed to eliminate or minimise hazards and risks before they are introduced into the workplace and subsequently maintained towards the same purpose
- Work, work processes and systems of work are designed and managed to eliminate or minimise hazards and risks and to suit a wide range of worker capabilities.

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Supply chains and networks - Improved work health and safety through supply chains and networks

- Supply chain and network participants understand their cumulative impact and actively improve the health and safety of the supply chain
- Commercial relationships, including contractual arrangements, within supply chains and networks are used to improve work health and safety.

Health and safety capabilities - Improved work health and safety capabilities

- People in the organisation have the WHS capabilities they require
- Those providing work health and safety education, training and advice have the appropriate capabilities
- Work health and safety skills development is integrated effectively into relevant education and training programs.

Processes and practices

- Address legal and regulatory compliance
- Are integrated into all organisational processes, activities and practices to enable WHS compliance to be an integral part of operational thinking, discussions and decision making
- Are context-driven and prioritised according to the assessed level of risk
- Are systematic, structured, timely and consistent with the Synod body's Enterprise Risk Management
 Frameworks
- Harness available technology to support documentation and evidence of WHS compliance management to protect the integrity and reputation of the Synod body
- Are dynamic, iterative and responsive to change, facilitating continual improvement and enhancement of the Synod body.

Key Component 3: WHS Assurance and Governance

Governance, Reporting and Performance

Due diligence as outlined in the WHS Act is the corporate governance responsibility of officers with respect to WHS to determine whether the Person Conducting a Business or Undertaking (PCBU) complies with its work health and safety duties and to strongly influence the health and safety culture of businesses and undertakings.

The due diligence obligations as articulated under Queensland WHS legislation, reinforces the importance of appropriately 'informed' WHS decisions and assurance and for appropriate reporting and escalation within the management structures of the Synod bodies and Queensland Synod. These requirements have potential important implications at all levels as the reporting of performance information guides executive decision-making and assurance to governance bodies.

Performance measures are required to assist verification, guide strategy and better inform WHS decision making. They also provide the verification of legal compliance and of the implementation and effectiveness of managerial and resource allocation processes needed to eliminate or minimise risk.

WHS Assurance

Verification processes are to occur at all levels of managerial oversight across an organisation. By taking a three-dimensional perspective), inspired by the three lines of defence model, three unique perspectives on WHS governance and assurance become evident. Each level of management has different governance objectives and employs different KPIs (Key Performance Indicators) to address their responsibilities, unique concerns and

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performance responsibilities. Critical issues of governance and assurance should filter up from one level to the next.

Governance level oversight

Monitoring the quality of WHS systems and corporate governance controls by Synod bodies boards/ councils (however named), with oversight by auditors, regulators and external WHS accreditation bodies are to provide the required assurance levels. KPIs evaluate processes for managerial and Synod oversight, i.e. the implementation and effectiveness of strategy, policies, systems and Synod governance controls.

WHS Performance Reporting

The Synod bodies are to identify and use relevant lead and lag KPIs (tailored to the organisation's particular context and decision-needs that can best inform the challenges faced by their enterprise).

WHS KPIs or success measures developed by the organisation are recommended to support officer due diligence requirements in accordance with WHS legislative requirements. Such success measures could include:

- Knowledge of general WHS concepts and practices and their understanding of the WHS risk associated with the business enterprise and its operations
- Data relating to WHS performance: understanding processes of hazard identification, prioritisation and risk control, and the outputs of the WHS performance management system
- Information relating to oversight and assurance: the verification of legal compliance and of the implementation and effectiveness of managerial and resource allocation processes needed to eliminate or minimise risk.

Synod Standing Committee WHS Reporting Requirements

The following reporting parameters will assist the Synod Standing Committee in its governance requirements and provide an oversight of WHS performance and risks, in relation to the synod bodies that are part of the legal body, The Uniting Church in Australia Property Trust (Q.).

The Synod bodies can enable the monitoring, reporting and escalation of WHS management matters on a timely basis to their respective council/boards and, as required, to the Synod ARC on behalf of the Synod Standing Committee.

Bi-annual 'Board to Board' reporting is an appropriate mechanism to consist of the following WHS Framework target and performance indicator measures:

- Notifiable WHS incidents to the regulator
- WHS incident trends e.g. total recordable injury (The total raw number of fatalities, lost time injuries/illnesses and medical treated injuries/illnesses and restricted work injuries/illnesses) and total recordable injury frequency rate (total TRIs x 1,000,000)/ total hours worked)
- Workers compensation insurance costs
- Performance against the Synod body's established WHS targets and objectives
- The outcome of any independent (third party audits) in the form of an executive summary and action plan
- A summary of WHS regulatory breaches
- Progress on specific programs to manage emerging risk e.g. safety climate survey, fleet safety program.

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Key Component 4: Evaluation and Continuous Improvement

The long-term goal is to continue to review and improve the WHS Management System towards the elimination of workplace injury and illness.

A formal and systematic approach to WHS management will maximise WHS benefits in a visible and traceable way. The following can assist the organisation to track and evaluate their status:

- Schedule internal audits and inspections of the WHS management system at planned intervals so as to confirm compliance with planned arrangements for WHS management and to confirm it has been implemented and maintained
- Schedule external audit programs against the provisions of "AS/NZS 4801 the scope determined by the senior management team/respective delegate to be followed by ongoing discussion at management review meetings"
- Incorporate respective managers/supervisors in their areas of responsibility for participating in the audit processes
- Participate in a formal management review of the whole of the Synod-wide WHS Management System Frameworks, led by a third party, every three years.

Management Review

A management review is part of good governance, where senior management and WHS Professionals consider and examine the WHS Management system holistically to consider:

- Results of internal audits and investigations
- Communications from external interested parties including complaints
- The WHS performance of the business
- The extent of which objectives, targets and programs have been met
- Status of corrective and preventive actions
- Follow up from previous WHS Management review meetings
- Changing circumstances including developments in legal and other requirements related to WHS risks
- Injury performance (injury prevention)
- Financial performance (cost effectiveness)
- Safety performance (hazard elimination/minimisation)
- Recommendations for improvement.

The output from management review process may include actions or recommendations related to possible changes to:

- WHS policy
- Objectives, targets and programs
- Roles, responsibilities and authority
- Management plans
- WHS risk register or the WHS component of the Synod body's risk register
- WHS management system, WHS management/ operational plans
- Mechanisms to support continual improvement of the WHS Management System.

A separate management review process is recommended to occur on an annual basis within each Synod body. It is imperative that a record of management review meetings is retained, not only for compliance purposes but to ensure actions are tracked and communicated throughout the organisation.

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Attendance of officers at such a review may fulfil many of their due diligence requirements as detailed in the WHS Act.

Continuous improvement

Fostering continuous improvement in WHS performance can be accomplished by integrating WHS risk management principles into operational and strategic decision-making processes in keeping with the organisation's WHS Policy.

Examples of continual improvement issues include, but are not limited to:

- New spheres of operation
- New technology
- Good practices, both internal and external to the organization
- Suggestions and recommendations from interested parties
- New knowledge and understanding of WHS issues
- New or improved materials
- Changes in worker capabilities or competence
- Achieving improved performance with fewer resources (i.e. simplification, streamlining).

Related documents

Qld Synod Risk Management Framework – *in progress* Synod Incident Escalation Policy – *in progress*

AS/NZS 4801:2001 Occupational health and safety management systems - Specification with guidance for use AS/NZS 4804:2001 Occupational health and safety management systems - General guidelines on principles, systems and supporting techniques

ISO 31000:2018 Risk Management -Guidelines

Definitions

Term	Meaning			
Person Conducting a Business or Undertaking (PCBU)	Person conducting a business or undertaking (PCBU) : a business or an undertaking that is either conducted alone or with others, whether or not for profit or gain. A PCBU can be:			
	 a sole trader (for example a self-employed person) a partnership a company 			
	 an unincorporated association a government department a public authority (including a municipal council). 			
Officer	Officer: for a corporation, partnership or unincorporated association is as defined in section 9 of the Corporations Act 2001, and includes a person: who makes, or participates in making decisions that affect the whole or a substantial part of the business has the capacity to significantly affect the corporation's financial standing on whose instructions the directors of the corporation are accustomed to act.			
Due Diligence	 Due diligence: emphasises the corporate governance responsibilities of officers. Officers of corporations and unincorporated bodies will need to show that they have taken reasonable steps to: acquire and update their knowledge of health and safety matters understand the operations being carried out by the person conducting the business or undertaking in which they are employed, and the hazards and risks associated with the operations 			

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	 ensure that the person conducting the business or undertaking has, and uses, appropriate resources and processes to eliminate or minimise health and safety risks arising from work carried out ensure that the person conducting the business or undertaking has appropriate processes in place to receive and respond promptly to information regarding incidents, hazards and risks ensure that the person conducting the business or undertaking has, and uses, processes for complying with duties or obligations under the Work Health and Safety Act 2011 (the WHS Act) and for verifying compliance with those duties. 				
Synod	Means the Synod of Queensland and includes the bodies within its organisational structure.				
Synod Bodies	Includes councils, committees, departments, colleges, boards, agencies, funds and any other Synod institution, entity or property trust Accountability for WHS risk management remains with each Synod body. ARC may request WHS risk management information relevant to each Synod Body, this will be provided by the relevant Synod body. ARC may also obtain relevant information from any employee, Synod body, presbytery or congregation and any relevant external party and to institute special investigations.				
Audit and Risk Committee (ARC)	The ARC ("the committee") assists and advises the Synod Standing Committee in fulfilling its corporate governance responsibilities to exercise due care, diligence and skill in relation to oversight of Synod risk management and compliance systems. The committee has the authority to seek any information it lawfully requires from any employee of the Synod and all employees must comply with such lawful requests.				
Synod Standing Committee (SSC)	The Synod Standing Committee is appointed by Assembly to act on behalf of the Assembly in respect of responsibilities of Assembly (Constitution, Clause 47), and is responsible for dealing with matters referred to it by Synod (Regulations, para 3.7.4.1). The Synod shall appoint from among its members a Standing Committee which shall be empowered to act on behalf of the Synod between meetings of the Synod in respect of any of the responsibilities of the Synod except such as the Synod may determine. The Standing Committee may co-opt additional members of the Synod to act on the Standing Committee. The Standing Committee shall consist of no fewer lay members than ministerial members.				
The Uniting Church in Australia, Queensland Synod (also called we or us or the Church)	Means the functions and activities of the Uniting Church in Australia: within and in relation to the bounds of the Queensland Synod and outside the bounds of the Queensland Synod (where managed by parts of the organisation located within the bounds of the Queensland Synod), under the Uniting Church in Australia Act 1977 (Qld).				
Queensland Synod office	Means the work and activities of the Uniting Church in Australia performed within the bounds of the Queensland Synod office including Trinity College Queensland, Raymont Residential College and the Alexandra Park Conference Centre.				

Revisions

Document number		PRO-WHS-				
Version	Approval date	Approved by	Effective date	Document owner	Document contact	
1.0	01.11.2018	Synod Standing Committee	01.11.2018	Executive Director Risk	Manager, Risk and Compliance	
Next scheduled review		01.11.2020				