

Work Health and Safety Policy

Date policy was made

28 April 2017

Commencement date of this version

19 September 2023

Application

This policy applies to all people who carry out work in any capacity, including, without limitation, Directors, Employees, Contractors, Consultants, Volunteers, and Agents, for Greyhound Racing New South Wales (GRNSW).

Purpose

The overall objective of this policy is to provide for a work health and safety (WHS) management system which complies with or exceeds relevant legislation and standards.

Policy Statement

GRNSW considers the WHS of all employees, officers, contractors, suppliers, volunteers, members and visitors to GRNSW to be of utmost importance.

GRNSW is committed to complying with its legislative obligations to ensure, so far as is reasonably practicable the health and safety of all of its Employees while they work for GRNSW, and that the health and safety of other persons is not put at risk from GRNSW's activities.

1. Work Health and Safety Risk Management

1.1 Responsibilities

Officers of GRNSW

Officers of GRNSW must exercise 'due diligence' to ensure that GRNSW complies with its duties and obligations under WHS legislation.

Officers of GRNSW for the purposes of the WHS legislation include the Directors, the Chief Executive Officer (**CEO**), Deputy Chief Executive Officer (**DCEO**) and Chief Financial Officer (**CFO**) of GRNSW.

In order to meet the due diligence requirements, actions of Officers of GRNSW include:

- acquiring and keeping up to date knowledge of WHS matters and legislative requirements, including attending training (this training will also be provided to Employees that report to Officer positions);
- communicating about hazards and risks;
- understanding GRNSW's safety and risk management procedures;
- understanding the hazards and risks associated with GRNSW's operations;
- participating in risk management processes;
- ensuring allocation of adequate resources by GRNSW to manage safety; and
- receiving and considering reports about incidents, hazards and risks and GRNSW's safety performance and compliance.

Managers

Managers are required to:

- ensure that GRNSW's WHS policies are understood and adhered to by Employees;
- ensure implementation of GRNSW's WHS policies within their area of responsibility;
- consult with Employees about health and safety matters;
- identify WHS training needs and develop and implement training plans in consultation with Employees;
- ensure that Employees reporting to them have attended all relevant training and have the skills, knowledge and qualifications to perform their job safely;
- ensure that identified hazards that cannot be controlled are immediately reported and addressed;
- ensure that all incidents, injuries, illnesses and near misses are reported and appropriately responded to;
- undertake risk assessments and ensure control measures are implemented in consultation with Employees;
- monitor and review risk assessments and control measures;
- refer complex issues requiring a higher level of authority to a more senior Manager; and
- undertake training relevant to their health and safety responsibilities, including the mandatory WHS supervisor and manager training.

Head of People, Culture and Training

The Head of People, Culture and Training is responsible for:

- developing and maintaining GRNSW's WHS risk management procedures;
- providing advice and support in relation to risk management processes;
- monitoring and reviewing the implementation of risk management processes;
- assisting with the response, notification and investigation of serious incidents; and
- maintaining relevant data in relation to incidents, analysing incident data in consultation with the WHS Committee, and preparing reports for Officers and Managers when required.

Employees

Employees are required to:

- look after their own health and safety and that of others;
- follow safety instructions;
- report all hazards, near misses, incidents, injuries and illnesses immediately to their Manager;
- assist to rectify hazards;
- cooperate with Managers on health and safety matters, including responding to and investigating any incident;
- attend all necessary safety training as directed by their supervisor;
- where applicable, participate in WHS consultation, training, identification and risk management processes;
- comply with GRNSW's WHS policies; and
- Log an incident report in Employment Hero for any safety incidents within 24 hours of the incident being reported.

Where Employees have concerns about their safety or health, this should be reported to their Manager. Any Worker who is concerned that their safety or the safety of another person is at risk from a work activity should stop that work activity or remove themselves from the work environment and immediately speak to their supervisor about their concerns.

1.2 What is WHS Risk Management?

The objective of WHS risk management is to address problems before injuries and incidents occur. It involves a systematic process for addressing hazards and risks in the workplace.

There are 5 steps in GRNSW's risk management process as follows:

- Step 1:** **Identify** any foreseeable hazard which has the potential to cause harm
- Step 2:** **Assess** the risk of harm arising from the hazard.
- Step 3:** **Eliminate** the hazard, or if it is not *reasonably practicable* to eliminate the hazard, minimise the hazard through risk control.
- Step 4:** **Review** the risk assessment and any measures to control the risk.
- Step 5:** **Provide** information to other persons about the risk and steps to be taken to control the risk.

An explanation of these five steps is set out in GRNSW's **WHS Procedures – Appendix A**.

The concept of “**reasonably practicable**”, in relation to a duty to ensure health and safety, means that which is, or was at a particular time, reasonably able to be done in relation to ensuring health and safety, taking into account and weighing up all relevant matters including:

- *the likelihood of the hazard or the risk concerned occurring, and*
- *the degree of harm that might result from the hazard or the risk, and*
- *what the person concerned knows, or ought reasonably to know, about:*
 - *the hazard or the risk, and*
 - *ways of eliminating or minimising the risk, and*
- *the availability and suitability of ways to eliminate or minimise the risk and*

- *after assessing the extent of the risk and the available ways of eliminating or minimising the risk, the cost associated with the available ways of eliminating or minimising the risk, including whether the cost is grossly disproportionate to the risk.”¹*

1.3 Managing Specific Safety Risks

GRNSW’s operations include specific safety risks. These risks relate to:

- plant and equipment
- chemicals and other hazardous materials
- manual handling processes

Information relating to the management of these risks is contained in GRNSW’s **WHS Procedures Appendix B**.

2. Incident Response, Reporting and Investigation

2.1 Immediate Steps To Follow In The Event Of A Serious Incident

Where a serious incident occurs, site personnel must immediately report the incident to a manager or supervisor in accordance with GRNSW’s procedures.

Site personnel and the manager or supervisor must then take all necessary immediate steps to ensure the safety of people and property, including:

- attending to and providing first aid to any injured persons;
- ensuring the safety of other Employees;
- calling emergency services (if required) – emergency services should be called if the incident presents an immediate threat to human health or property;
- evacuating the site (if required); and
- shutting down utilities (gas, electrical, water) (if required).

Once these immediate steps have occurred, site personnel and the manager or supervisor must then:

- assess and control safety risks and ensure the area is safe;
- take measures to stop pollution;
- secure the site and ensure the site is not disturbed until a Workplace Inspector (if applicable) or GRNSW management (i.e. responsible General Manager and/or Head of People, Culture and Training) directs otherwise; and
- notify GRNSW management (i.e. responsible General Manager and/or Head of People, Culture and Training).

Once notified about a serious safety incident, GRNSW management must contact GRNSW’s Legal Counsel who will provide assistance in managing the response to the incident. The GRNSW CEO and DCEO must also be notified. GRNSW management, in consultation with GRNSW’s Legal Counsel, will determine whether the incident is a Notifiable Incident. Details as to what constitutes a ‘Notifiable Incident’ are set out in the Definitions in section 12 of this Policy.

¹ Work Health Safety Act 2011 No 10, section 18
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2.2 External Notifications

GRNSW must ensure that all Notifiable Incidents are reported **immediately** to Safe Work NSW by its Legal Counsel.

Pollution Incidents must be notified **immediately** by GRNSW's Legal Counsel to:

- the NSW Environmental Protection Authority (EPA);
- relevant local municipal council(s); and
- Sydney Water if a contaminated spill is likely to enter Sydney Water's sewage system.

GRNSW through its Legal Counsel must also notify GRNSW's insurer within 48 hours of any serious incident.

2.3 Site Preservation

If the incident is a Notifiable Incident, the incident site must be preserved until a SafeWork NSW Inspector attends (or the Inspector or regulator directs otherwise).

This requirement does not prevent action from being taken:

- to assist an injured person;
- to remove a deceased person;
- that is essential to make the site safe or to minimise the risk of a further notifiable incident;
- that is associated with a police investigation;
- for which an inspector or the safety regulator has given permission.

2.4 Incident Reporting

Any incident, injury or near miss arising from a work-related activity must be reported by the responsible manager according to GRNSW's prescribed procedures. The prescribed procedures are set out in GRNSW's **WHS Procedures - Appendix D**.

2.5 Incident Investigation

Where a serious incident or near miss occurs, GRNSW management will consult with GRNSW's Legal Counsel in relation to how the incident investigation will occur and the investigation team to be established.

Where a Notifiable Incident occurs, GRNSW's Legal Counsel will commission a privileged investigation into the incident so that legal advice can be obtained in relation to the incident.

GRNSW's Legal Counsel may commission a privileged investigation for incidents other than Notifiable Incident (for example, where there is media interest or attention from the regulator arising from the incident).

2.6 Investigation By External Parties

Where a Notifiable Incident occurs, SafeWork NSW will usually conduct their own investigation of the incident. NSW Police may also conduct an investigation if the circumstances of the incident warrant it. The EPA will usually investigate a Pollution Incident.

Where such an investigation occurs, GRNSW Legal Counsel will be responsible for liaising with the SafeWork Inspector/Police and cooperating with any requests they may make.

GRNSW's Legal Counsel must be contacted where requests are made by a SafeWork NSW Inspector or Police to conduct interviews with GRNSW Employees or for the production of any documents.

2.7 Risk Assessment

Where a serious incident or near miss occurs, a risk assessment will be conducted to identify and assess risks and determine whether any procedures or controls should be amended or implemented to minimise the risk of the incident recurring.

2.8 Incident Data and Analysis

The Head of People, Culture and Training will maintain relevant data in relation to incidents, e.g., the number, type and severity of incidents. The Head of People, Culture and Training will undertake a regular analysis of this data in conjunction with the WHS Committee in order to identify underlying trends and as appropriate, make changes to the GRNSW WHS program.

Records from this analysis and the improvement details will be documented and reported to GRNSW Management and Employees via the WHS Committee to the extent appropriate. Specific relevant information may also be reported to the Directors, the CEO, DCEO, General Managers and responsible managers.

2.9 Records Management

GRNSW will retain all records and registers that are required to be maintained by the WHS Act and Regulations. Details of records and registers to be maintained are set out in GRNSW's **WHS Procedures Appendix H**.

Records must also be kept of any Notifiable Incidents arising from GRNSW's activities.

3. Training and Induction

3.1 Training

GRNSW will ensure that appropriate information, training and instruction is provided to Employees so that Employees are able to carry out their activities in a safe manner.

Training will be developed and provided in accordance with a Training Needs Analysis (TNA). Factors and information to be considered in developing and implementing the TNA are set out in GRNSW's **WHS Procedures - Appendix I**.

All managers and supervisors are required to undertake WHS training for managers and supervisors, and other relevant health and safety training as determined by the Training Needs Analysis.

More specialised training required for particular Employees should be identified through the Training Needs Analysis.

3.2 Induction

Employees are required to undertake a general WHS Induction. The content of the induction will consist of a GRNSW business wide component and additional specific components relating to the worker's required job function and area of work. Details of Induction training are set out in GRNSW's **WHS Procedures - Appendix I**.

Visitors to GRNSW premises / sites will be required to undertake a site induction, addressing:

- site specific hazards and risks;
- control measures for risks; and
- emergency procedures for the site.

3.3 Events

Event organisers must make information about safety available to anyone attending events on GRNSW premises or sites. This should cover emergency procedures and any other hazard-related information specific to that event.

4. Consultation

4.1 Consultation Overview

Consultation with Employees and other organisations will be conducted as part of:

- risk management processes;
 - making decisions about facilities in the workplace;
 - proposing changes that may affect health and safety; and
 - making decisions about procedures that relate to health and safety.
- Mechanisms for consulting with Employees may include:
- 'toolbox' talks;
 - discussions at team meetings;
 - notice boards;
 - direct supervision;
 - Health and Safety Representatives (HSRs) (where elected);
 - WHS Committee Meetings; and
 - discussions with managers and supervisors.

4.2 Consultation With Other Duty Holders

GRNSW will consult, cooperate and coordinate activities with other organisations that have shared safety responsibilities with GRNSW (for example, contractors, suppliers, clubs and landlords).

The purpose of this process is to identify shared safety risks and determine the extent to which such risks can be eliminated or mitigated and what control measures will be put in place for those risks and who will have responsibility for mitigating actions and controls.

Mechanisms of how these processes will occur may include:

- tender negotiations;
- contract negotiations;
- risk assessments / development of standard operating procedures;
- supplier/contractor meetings;
- site meetings; and
- supplier/contract reviews.

4.3 WHS Committee

GRNSW must establish a WHS Committee where requested by five or more Employees.

Where established, the GRNSW WHS Committee will consist of an elected group of Worker representatives who meet regularly with local management to discuss safety matters.

- Activities of the WHS Committee may include:
 - conducting workplace inspections;
 - reviewing reports and safety data;
 - recommending corrective actions;
 - overseeing safety strategies and initiatives; and
 - reviewing policies and procedures.
- A newly elected WHS Committee will agree to and document a GRNSW WHS Committee Constitution at the first meeting consisting of a quorum.
- The Committee Constitution will address the following:
 - functions of the Committee, as per legislative requirements;
 - processes for Committee decision making;
 - requirements for membership and term of office, as per legislative requirements;
 - nomination and election processes;
 - roles of Committee office holders;
 - meeting protocols and procedures, including requirements for the distribution of an agenda and minutes; and
 - the frequency of meetings

In terms of membership, GRNSW should aim to have representation from across GRNSW's activities and locations on its WHS Committee.

GRNSW will allow each member of the WHS Committee to spend the time that is reasonably necessary, in work time, to attend meetings and carry out the functions of the Committee.

Training will be provided to WHS Committee members to enable them to undertake their role and functions if necessary.

4.4 Health and Safety Representatives (HSRs)

GRNSW will facilitate the election of HSRs where this is requested by Employees, including by establishing workgroups for the election.

Once workgroups are established, any worker that is a member of the workgroup will be eligible to be elected as an HSR.

Appropriate training will be provided to HSRs once elected.

HSRs are elected for a period of three years, unless disqualified or no longer eligible in line with legislative requirements.

Elected HSRs are able to choose to be members of the WHS Committee.

5. Discriminatory Conduct

Treating a person less favourably because they raise a safety concern or hold a particular safety role is prohibited.

Where an employee has a concern about being discriminated against because of a safety reason, this should be reported to their manager or supervisor, or to the Head of Manager People, Culture and Training.

6. Emergency Procedure and First Aid

GRNSW will make appropriate first aid facilities and equipment available and will advise Employees of details of all trained first aiders in the workplace.

Procedures to follow in the event of an emergency will be displayed in all premises for which GRNSW is responsible, i.e., its offices, GAP sites and GRNSW owned/operated tracks.

Training on emergency procedures will be provided to Employees upon induction, and drills will be conducted periodically.

7. Audit and Review

From time-to-time GRNSW will conduct audits of this Policy and its management system, and may review and measure its WHS performance.

This Policy will be reviewed annually in accordance with the Policy review schedule contained in Section 15 of this Policy.

8. Consequences Of A Breach Of This Policy

If an employee of GRNSW breaches this policy, they may be subject to disciplinary action, up to and including termination of their employment.

9. Definitions

The following definitions are taken from the WHS Act. In this policy:

Dangerous Incident means an incident that exposes a worker or any other person to serious risk resulting from an immediate or imminent exposure to:

1. an uncontrolled escape, spillage or leakage of a substance;
2. an uncontrolled implosion, explosion or fire;
3. an uncontrolled escape of gas or steam;
4. an uncontrolled escape of a pressurised substance;
5. electric shock;

6. the fall or release from a height of any plant, substance or thing;
7. the collapse, overturning, failure or malfunction of, or damage to, any plant that is required to be design or item registered under the Work Health and Safety Regulations;
8. the collapse or partial collapse of a structure;
9. the collapse or failure of an excavation or of any shoring supporting an excavation;
10. the inrush of water, mud or gas in workings, in an underground excavation or tunnel, or
11. the interruption of the main system of ventilation in an underground excavation or tunnel.

Notifiable Incident means the death of a person; a 'serious injury or illness', or a 'dangerous incident'.

Pollution incident is an incident that causes or threatens material harm to the environment (which includes people). It includes a leak, spill or escape of a substance or circumstances in which this is likely to occur. Material harm includes on site harm and harm to the environment beyond the premises where the pollution incident occurs.

Serious Injury or Illness means an injury or illness requiring the person to have:

1. Immediate treatment as an in-patient in a hospital, or
2. Immediate treatment for:
 - 2.1 The amputation of any part of his or her body, or
 - 2.2 A serious head injury, or
 - 2.3 A serious eye injury, or
 - 2.4 A serious burn, or
 - 2.5 The separation of his or her skin from an underlying tissue (such as degloving or scalping), or
 - 2.6 A spinal injury, or
 - 2.7 The loss of a bodily function, or
 - 2.8 Serious lacerations, or
3. Medical treatment within 48 hours of exposure to a substance (which includes animal blood or body substances), or
4. Any infection to which the carrying out of work is a significant contributing factor, including work that involves handling or contact with animals, or
5. The following occupational zoonoses contracted in the course of work involving handling or contact with animals:
 - 5.1 Q fever
 - 5.2 Anthrax
 - 5.3 Leptospirosis
 - 5.4 Brucellosis
 - 5.5 Hendra Virus
 - 5.6 Avian Influenza
 - 5.7 Psittacosis.

Worker means a person who carries out work in any capacity for GRNSW including employees, contractors and sub-contractors and their employees, labour hire company employees, trainees, students gaining work experience and volunteers.

10. Relevant Legislation and Rules

- Work Health and Safety Act 2011 (NSW)
- Work Health and Safety Regulation 2017

11. Key Related Documents

- GRNSW Work Health and Safety Procedures
- GRNSW Motor Vehicle Policy (including Motor Vehicle Operating Procedures)
- GRNSW Appropriate Workplace Behaviour Policy

12. Amendments To, And Operation Of, This Policy

GRNSW reserves the right to amend this policy at any time. This policy does not operate contractually and is not intended to be contractual in nature.

Policy Information:

Date Policy Was Made	28 April 2017
Commencement Date Of This Version	19 September 2023
Policy Owner	Chief Executive Officer (CEO)
Policy Reviewer	Head of People, Culture and Training
Review Frequency	Annual

Revision History:

Version	Date	Description
1.00	28 April 2017	Administrator Approved
1.01	8 November 2021	CEO Confirmed
1.02	8 May 2023	CEO Approval
1.03	19 September 2023	CEO Approval