

Health, Safety & Wellbeing Policy

Version 2.0

This policy has been adopted by:

Name of Company	Adoption Date
Community Housing Limited	06/11/2024
Community Housing (Vic) Ltd	06/11/2024
Community Housing (Tas) Ltd	06/11/2024
Community Housing (Qld) Ltd	06/11/2024
Horizon Housing Realty Limited	06/11/2024
Australian Affordable Housing Securities Limited	06/11/2024

CONTENTS

1. OBJECTIVES AND APPLICATION	3
2. DEFINITIONS	3
3. CHL'S COMMITMENT	4
4. LEGISLATION	4
4.1. Federal	4
4.2. State	4
5. POLICY STATEMENT	5
5.1. Leadership and culture	5
5.2. Responsibility and authority	5
6. RISK MANAGEMENT FRAMEWORK	7
6.1. Monitoring and Evaluation	8
6.2. Recording and Reporting	8
7. CONSULTATION	8
8. BEHAVIOUR THAT CONTRAVENES THIS POLICY	8
8.1. Internal Complaint Resolution Procedure	8
9. WITNESS OBLIGATIONS	9
10. FALSE COMPLAINTS	9
11. VARIATIONS	9
12. EMPLOYEE ASSISTANCE PROGRAM	9
13. RELATED MATERIAL	9
13.1. CHL Group References	10
13.2. External References	10
14. MONITORING AND REVIEW	11
APPENDIX A: Health, Safety and Wellbeing Commitment Statement	12

1. OBJECTIVES AND APPLICATION

This policy applies to the employees, contractors, directors, board members, temporary employees, and volunteers (**Workers**) of Community Housing Limited and its related entities (**CHL**) that have adopted the Policy.

This policy:

- intends to outline how CHL and Workers provide services to clients and interact with other stakeholders and members of the public in a safe manner;
- applies to all aspects of employment, including recruitment and selection, conditions and benefits, training and promotion, task allocation, shifts, hours, leave arrangements, workload, equipment and transport; and
- applies at all times and locations where a Worker may be directly or indirectly performing their duties or interacting with another Worker, client, visitor, or other stakeholder, including on-site, off-site and after hours work, remote working, online spaces (including email and social media platforms), work-related social functions, conferences and any other CHL related events.

This policy should be read in conjunction with other workplace policies and procedures of CHL.

The purpose of this policy is to:

- define the principles intended to provide a safe workplace as well as deliver the best health, safety and wellbeing outcomes for all Workers whom CHL is responsible for; and
- provide the commitment to ensuring and improving the physical and psychological health, safety and wellbeing of CHL Workers.

2. DEFINITIONS

Throughout this policy, the following definitions apply, unless otherwise stated:

Term	Meaning
CHL Group	Means Community Housing Limited and each of its related entities that have adopted this policy.
Contractor	For the purpose of this policy a contractor refers to an independent professional or company hired to perform specific external services for CHL, such as landscaping or maintenance, but does not include contractors working directly on developments such as a builder or developer.
Due Diligence	The legal duty of business owners as responsible persons to ensure that the business complies with safety obligations. This includes implementing safe work systems and actively monitoring and evaluating safety management.
Hazard	A source or situation with the potential to cause harm, injury, illness or damage to property or environment OR a combination of these.
Officer	Members of the Executive Management Team will usually be classified as Officers according to the below definition and will have associated work health and safety due diligence duties. Board Members may be Officers according to the below definition, depending on their role will have the associated work health and safety due diligence duties. As defined within Corporations Act 2001 s9 which specifies – • a director or secretary of the corporation; or • a person who ○ makes or participates in making, decisions that affect the whole, or a substantial part, of the business of the corporation; or ○ who has the capacity to affect significantly the corporation's financial standing; or ○ in accordance with those instructions or wishes the directors of the corporation are accustomed to act (excluding advice given by the person in the proper

	performance of functions attaching to the persons professional capacity or their business relationship with the directors or the corporation); or • a receiver, or receiver and manager, of the property of the corporation; or • an administrator of the corporation; or • an administrator of a deed of company arrangement executed by the corporation; or liquidator of the corporation; or • a trustee or other person administering a compromise or arrangement made between the corporation and someone else.
PCBU	A legal term meaning 'Person Conducting a Business or Undertaking' (PCBU), which is used to quantify individuals, businesses or organisations that are conducting a business. Within WHS Legislation this includes employers, a corporation, an association, a partnership and sole trader. The PCBU holds a primary duty of care under the WHS Act.
Risk	The likelihood that harm to an individual or environment may occur when exposed to a hazard
WHSMS Framework	Work Health and Safety Management System (WHSMS) is a framework of linked management activities designed to continuously improve safety and wellbeing and comply with the law; the CHL Framework provides a practical format for implementing CHL's WHSMS and a tool for both management and workers with health and safety responsibilities to meet CHL's WHSMS requirements.

3. CHL'S COMMITMENT

CHL is committed to the health, safety and wellbeing of its Workers and visitors through the implementation of a documented work health and safety management system. This policy defines the principles of this commitment and CHL's approach to the continuous improvement of health and safety in the workplace. CHL's Health, Safety and Wellbeing Commitment statement (see Appendix A) succinctly demonstrates the commitment for all Workers.

Resources in line within the importance of health and safety in the workplace, will be made available to comply with the requirements of all relevant legislation to ensure that the workplace is safe and without risk to health and wellbeing to workers

4. LEGISLATION

Provisions relating to this policy are contained in both federal and state legislation.

4.1. Federal

- Work Health and Safety Act 2011 (Cth);

4.2. State

New South Wales	○ Work Health and Safety Act 2011 (NSW)
Northern Territory	○ Work Health and Safety (National Uniform Legislation) Act 2011 (NT)
Queensland	○ Work Health and Safety Act 2011 (QLD)
South Australia	○ Work Health and Safety Act 2012 (SA)
Tasmania	○ Work Health and Safety Act 2012 (TAS)
Victoria	○ Occupational Health and Safety Act 2004 (VIC)
Western Australia	○ Work Health and Safety Act 2020 (WA)

5. POLICY STATEMENT

CHL is committed to ensuring and improving the physical and psychological health, safety and wellbeing of our Workers in our workplaces. To achieve this CHL will:

- a) Create and foster a SafetyFirst culture where health and safety is considered an integral part of CHL's business;
- b) Implement and maintain an effective work health and safety management system with evaluation and management review for continuous improvement;
- c) Implement a standardised health and safety risk management process, which is consistent with the activities and operations, to ensure workplace hazards are eliminated or where elimination is not possible, identified, assessed, controlled and reviewed;
- d) Comply with all applicable health and safety legislation, approved Codes of Practice, Australian Standards and other requirements;
- e) Establish measurable objectives and targets for health and safety aimed at the elimination of work-related illness, and injury and at continuous system improvements;
- f) Provide and disseminate appropriate health and safety information, instruction, training and supervision to Workers and visitors;
- g) Allocate sufficient financial and physical resources to enable the effective implementation of this policy; and
- h) Implement and maintain a process to engage all workers, so far as reasonably practicable, for consultation and where there is an impact on their health and safety while at work, for decision making.

5.1. Leadership and culture

CHL aims to promote a strong health and safety leadership and a positive culture of health and safety through:

- Ensuring CHL's work health and safety management system is appropriate to CHL's operations and is implemented consistently across all offices, parts and functions of CHL;
- Integrating health, safety and wellbeing risk management into all aspects of its business;
- Encouraging and supporting innovative, healthy and safe work practices and systems of work;
- Determining, in consultation with Workers, health safety and wellbeing outcomes;
- Improving CHL's health, safety and wellbeing performance; and
- Ensuring Workers have the necessary skills and knowledge to achieve appropriate health, safety and wellbeing outcomes.

5.2. Responsibility and authority

Work health, safety and wellbeing is everyone's responsibility. Each CHL Worker is required to adhere to the commitment set out in this policy.

5.2.1. Overall responsibility

- The Chief Executive Officer has responsibility for reporting CHL health and safety performance to CHL Directors and Board Members (who may have Officer Due Diligence requirements).
- The Chief People Officer has overall responsibility for the work health and safety management system, and to provide performance reports to the Executive and Boards.

5.2.2. General Responsibilities

CHL Officers are responsible for:

- ensuring CHL meets its obligations under WHS legislation by using all due diligence to understand the nature of the work and associated hazards and ensuring that the appropriate resources are allocated to control any identified risk.

The Safety and Wellbeing Manager must:

- review and assess health and safety (and any other relevant legislative requirements) to establish and document all health and safety responsibilities, authority to act and reporting relationships.

The Chief People Officer must:

- ensure that position description templates include reference to general health and safety responsibilities.

Managers must:

- model appropriate standards of behaviour and promote a workplace culture where unsafe work practises are unacceptable;
- take steps to educate, communicate, promote and make Workers aware of their obligations under this policy and the law;
- intervene promptly and appropriately when they become aware of unsafe behaviour and/or work tasks;
- treat all complaints of unsafe behaviour and/or work tasks seriously and confidentially and take prompt action to address them;
- refer formal complaints about breaches of this policy to the Chief People Officer for investigation; and
- ensure Workers who make a complaint are not victimised.

All Workers must:

- understand and comply with this Policy and Responsibility Capability Statements;
- ensure they do not engage in unsafe behaviour towards other Workers, customers/clients or others with whom they come into contact within the course of performing their duties;
- treat others with dignity, respect and courtesy;
- ensure they do not aid, abet, encourage or otherwise permit other persons to engage in or are otherwise involved in unsafe behaviour and/or work tasks;
- report any unsafe behaviour and/or work practices in accordance with this policy;
- not victimise any complainant or witnesses to unsafe behaviour and/or work tasks;
- maintain confidentiality if they are involved in the complaint procedure; and
- seek assistance when unsure about how to implement this policy.

CHL communicates the legal responsibility of safety, health and wellbeing with their Workers at the commencement of their employment. Workers acknowledge their understanding via capability statements, which are attributed in accordance with their level of responsibility within the organisation.

These are outlined below:

Level	Capability Statements
1	• take reasonable care for their own safety and the safety of others; and take reasonable care that their own acts or admissions do not adversely affect the safety of others; • comply with any reasonable instruction, policy or procedure of CHL in relation to health and safety; • comply with instructions and training provided in adhering to safe work procedures; • identify and report all known health, safety and wellbeing hazards, incidents and near misses; • actively participate in development and evaluation of control or other preventative measures in relation to hazard reduction in the workplace.
2	• take reasonable care for their own safety and the safety of others; and take reasonable care that their own acts or admissions do not adversely affect the safety of others; • ensure all health, safety and wellbeing policies, procedures and directions are complied with; • monitor all aspects of health, safety and wellbeing in the workplace and promote a culture where safety is positively discussed; • ensure audits, fire and emergency training and inspections are conducted in the required timeframes • ensure workers are provided with instruction and training to improve awareness, skills and knowledge to embed safe work practices; • regularly consult with workers on relevant health, safety and wellbeing matters; • identify and report all known health, safety and wellbeing hazards, incidents and near misses.
3	• take reasonable care for their own safety and the safety of others; and take reasonable care that their own acts or admissions do not adversely affect the safety of others; • drive the implementation of health, safety and wellbeing policies, procedures and ensure directions are complied with; • set measurable safety objectives and targets relevant to departmental WHS risk profile; • regularly consult with workers on safety, health and wellbeing matters; • take reasonable steps to maintain knowledge of relevant safety, health and wellbeing matters; • ensure audits, fire and emergency training and inspections are conducted in the required timeframes, and implement identified further controls where required; • ensure workers are equipped with the information, instruction and training to embed safe work practices; • ensure all known health, safety and wellbeing hazards, incidents and near misses are reported, investigated and forwarded to Safety and Wellbeing in a timely manner to assist in the prevention of future incidents. Recommended controls are to be reviewed to ensure effectiveness and relevance.
4	• take reasonable care for their own safety and the safety of others; and take reasonable care that their own acts or admissions do not adversely affect the safety of others; • ensure validation and compliance of all health, safety and wellbeing policies, procedures and guidelines; • set measurable safety objectives and targets relevant to departmental WHS risk profile; • regularly consult with workers on safety, health and wellbeing matters; • take reasonable steps to maintain knowledge of relevant safety, health and wellbeing matters; and participate in the review of resources required to implement the WHS Management System; • ensure audits and compliance-based activities (e.g. fire and emergency training, inspections) is conducted in the required timeframes, implement identified further controls where required as outlined in the WHS Management System; • ensure workers are equipped with the information, instruction and training to embed safe work practices; • ensure all known health, safety and wellbeing hazards, incidents and near misses are reported, investigated and forwarded to Safety and Wellbeing in a timely manner to assist in the prevention of future incidents. Recommended controls are to be reviewed to ensure effectiveness and relevance.

6. RISK MANAGEMENT FRAMEWORK

CHL is committed to taking a proactive, holistic approach to safety, health and wellbeing in the workplace. The WHS Management System Framework further outlines CHL's risk management framework including practical guidelines, implementation, monitoring and review of the principles.

The Chief People Officer is responsible for the risk management process relating to safety, health and wellbeing in the workplace.

6.1. Monitoring and Evaluation

To ensure effective health, safety and wellbeing management CHL will undertake monitoring and evaluation activities as appropriate, and in accordance with legislative guidelines.

6.2. Recording and Reporting

Reporting and recording of incidents, hazards and near misses is recognised as an important component in effectively preventing harm. CHL encourages all workers to challenge the environment in which they work through open communication and reporting. Incident reporting is captured through Protecht. All reported incidents, hazards and near misses are reviewed and followed up at the local level to ensure the wellbeing of all injured / ill workers is considered and that the risk of further harm is mitigated.

Safety and Wellbeing provides the resources to record activities associated with this Policy. Additionally, they will also provide the relevant information and reports to the Chief People Officer to demonstrate and provide assurance that the objectives and outcomes outlined in this policy are being achieved.

7. CONSULTATION

As far as is reasonably practicable, CHL is committed to communicate and consult with its Workers to encourage active participation in improving safety, health and wellbeing at their workplaces, so that risks are adequately controlled and the level of productivity is maintained. This may include, but is not limited to:

- introduction of new policies, procedures or systems of work;
- identification of risks and hazards;
- implementation of measures to eliminate and/or minimise all risks;
- development of risk assessments;
- changes to the way information, training, instruction and supervision are provided; and/or
- when making decisions about procedures for consulting with Workers.

CHL consults and engages with Workers in the following ways:

- Health and Safety Committee meetings, employee surveys, psychosocial consultation sessions, Health, Safety and Wellbeing Working Groups, regular team meetings, training and tool box talks.

8. BEHAVIOUR THAT CONTRAVENES THIS POLICY

8.1. Internal Complaint Resolution Procedure

CHL has an Internal Complaint Resolution procedure. Any Worker who feels that they have been subjected to any unsafe work practises should discuss their concerns with their manager, their manager's manager or People and Culture in accordance with the Internal Complaint Resolution Procedure.

CHL's Internal Complaint Resolution Procedure is based on confidentiality, procedural fairness, protection from victimisation and prompt resolution. Any complaints of unsafe work practices will be dealt with promptly, confidentially and without victimisation of those involved.

CHL has implemented a Whistleblower Policy to empower workers to raise concerns about actual or suspected misconduct, malpractice, unethical behaviour, or unlawful activities. The policy ensures that individuals can report in confidence and without fear of retaliation or retribution.

9. WITNESS OBLIGATIONS

CHL worker's whom witness unsafe work practises play an important role in preventing such behaviour in the workplace. Where it is safe to do so, a Worker must take action if they witness another Worker demonstrating behaviour and/or work tasks that is unsafe towards themselves or others in accordance with the Internal Complaint Resolution Procedure. Where a Worker ignores the unsafe behaviour and/or work tasks, this may be taken as tacit approval of the unsafe behaviour.

Workers who witness unsafe work behaviour and/or tasks are encouraged to:

- formally or informally challenge the unsafe behaviour and/or tasks if it is safe to do so and they feel comfortable;
- report the unsafe behaviour and/or tasks in accordance with the Internal Complaint Resolution Procedure; or
- If the worker is not comfortable with either of the above options, report the actual or suspected unsafe behaviour and/or tasks under the Whistleblower Policy.

CHL will not tolerate any victimisation, bullying, harassment, intimidation or detriment against Workers who take witness action.

10. FALSE COMPLAINTS

CHL will not tolerate false complaints. Where it is substantiated that a Worker has made a false complaint the Worker will be subject to disciplinary action up to and including immediate dismissal for employees or immediate termination of engagement for contractors or board members.

11. VARIATIONS

CHL may vary, replace or revoke this policy.

Workers will be informed of revisions to this policy as they arise and the date from which these changes will take effect. In the event of any dispute under this policy, the decision of CHL will be final and binding.

12. EMPLOYEE ASSISTANCE PROGRAM

CHL provides a free confidential and independent Employee Assistance Program (EAP) to all members of staff and their immediate family members. Staff members/immediate family members may seek up to 6 professional counselling sessions per year on any work related or non-work-related matter. CHL's EAP is operated by a third party, Assure EAP.

Assure EAP is a nationwide EAP provider that offers face-to-face or phone counselling sessions at a time and location of the staff member's/immediate family member's choosing. To book an EAP appointment call 1800 808 372 (Company Code: CHL3038). Non-urgent EAP counselling appointments can be booked anytime between 8am-6pm, Monday-Friday however, 24/7 support is always available.

13. RELATED MATERIAL

The following material relate to and inform further interpretation of this policy:

13.1. CHL Group References

Safety & Wellbeing Material	CHL Corporate Material
WHS Management System Framework	Internal Complaints Resolution Procedure
WHS Agreements – L4, L3, L2 & L1	Code of Conduct
Appendix A: Health, Safety and Wellbeing Commitment Statement	Disciplinary Policy
	Disciplinary Procedure
	Whistleblower Policy

13.2. External References

If a Worker believes they may have been subjected to unsafe work practises they are also able to contact the WorkSafe regulatory body applicable to the State in which they are based. Information can also be obtained from the following sources:

WorkSafe QLD	
GPO Box 69 BRISBANE QLD 4001	Telephone: 1300 362 128 Website: https://www.worksafe.qld.gov.au/contact
SafeWork NSW	
Locked Bag 2906 LISAROW NSW 2252	Telephone: 13 10 50 Website: https://www.safework.nsw.gov.au/contact-us
WorkSafe VIC	
1 Malop Street Geelong VIC 3220	Telephone: 13 23 60 Website: https://www.worksafe.vic.gov.au/contact-worksafe
SafeWork WA	
Mason Bird Building 303 Sevenoaks St CANNINGTON WA 6107	Telephone: 1300 307 877 Website: https://www.commerce.wa.gov.au/worksafe/notify-submit-or-contact-us
SafeWork SA	
GPO Box 465 ADELAIDE SA 5001	Telephone: 1300 365 255 Website: https://www.safework.sa.gov.au/about-us/contact-us
NT WorkSafe	
GPO Box 1722 DARWIN NT 0801	Telephone: 1800 019 115 Website: https://worksafe.nt.gov.au/contact-us
WorkSafe Tasmania	
PO Box 56 ROSNY PARK TAS 7018	Telephone: 1300 366 322 Website: https://worksafe.tas.gov.au/contact

14. MONITORING AND REVIEW

This policy is maintained and managed by the CHL Group's Chief People Officer.

Revisions will be made as and when required, with reviews not exceeding three years. The date for review of this document is on or before November 2027. This document remains valid until such time that a new version is published.

Review History

Document reference	Date Approved	Version	Reason for review	Review frequency	Owner	Approver(s)
POLPCUAUSNATHSW202402	06/11/2024	2.0	Compliance with ISO 45001 & Updated with psychosocial language.	Triennial	Karen Conrades	Executives
POLABUAUSNATWSS201801	November 2018	1.0	New Policy	Annually	WHS Department	Managing Director

APPENDIX A: Health, Safety and Wellbeing Commitment Statement

Purpose

This policy statement outlines the commitment by Community Housing Limited and its related entities (CHL) to the health, safety and wellbeing of all persons undertaking activities associated with CHL.

Scope

This policy statement applies to all CHL employees, contractors, directors, board members, temporary employees, and volunteers (Workers) of Community Housing Limited and its related entities (CHL) engaging in activities with CHL.

Policy Statement

CHL is committed to meeting its duty of care, to ensure:

- the health, safety and wellbeing of its workers and visitors whilst undertaking activities at or for CHL;
- risks to the health, safety and wellbeing of workers are mitigated and minimised as far as reasonably practicable; and
- all compliance requirements are fulfilled.

Health and Safety Commitment

CHL's commitment to health and safety is demonstrated through its Work Health and Safety Management System (WHSMS). The system supports the governance arrangements, objectives and principles for health, safety and wellbeing to ensure safety risk management, incident reporting, injury management and compliance with all legal requirements.

Leadership Commitment and Consultation

CHL's executive management team will demonstrate leadership and commitment with respect to health, safety and wellbeing. CHL will:

- consult with workers to ensure safety management systems are operating effectively, and health and safety issues are regularly reviewed.
- continually improve and measure its health and safety performance through staff consultation, health and safety committee meetings and through the issue resolution process.

Planning, Support and Controls

CHL will take actions to address risks and opportunities and will:

- identify, assess and control all foreseeable risks in order to prevent or minimise harm
- establish health and safety objectives
- provide resources to maintain and continually improve the safety management system
- plan, implement, control and maintain processes to reduce hazards, manage change, support safe procurement and manage contractors
- ensure emergency preparedness and response
- report and investigate incidents, injuries, illnesses and other harm that may occur through work processes and implement and communicate preventative measures.

CHL workers will be provided with appropriate training to support and enable them to:

- undertake activities in a safe manner and adhere to the safety requirements of CHL
- report unsafe behaviour and/or work practices
- participate in the continual improvement of safety.

Wellbeing

CHL values the health of all workers and recognises that wellbeing is a significant factor in the workforce performance. CHL will foster a working environment that promotes a healthy, safe and engage community, to proactively support workers welfare to optimise their potential.

Performance Evaluation and Issue Resolution

CHL will evaluate health and safety performance through reporting, audit and review processes. Health and safety issues will be dealt with at the local office level. Workers, managers and supervisors must work together to resolve local office issues and participate in improving the health and safety performance and culture to ensure the safety of all persons involved in CHL activities and to protect the reputation and integrity of CHL.

Roles and Responsibilities

- The Chief Executive Officer has ultimate responsibility for the implemented and review of CHL's Health, Safety and Wellbeing Policy, delegation of health, safety and wellbeing management responsibilities, and the allocation of appropriate resources.
- The CHL Board Members are responsible for exercising due diligence to ensure compliance with health, safety and wellbeing policy and strategy.
- The CHL Executive Management Team has is committed to ensuring and improving the physical and psychological health, safety and wellbeing of its Workers in our workplaces. There are detailed and clearly

articulated accountabilities and obligations for all health and safety at all levels of management and workers within the WHSMS.

- All CHL Managers are responsible for modelling appropriate standards of behaviour, promote a workplace culture where unsafe work practices are unacceptable, and take steps to educate, communicate, promote and make their team members aware of their obligations under the health, safety and wellbeing policy, procedures and safety instructions.
- All CHL workers are responsible for taking reasonable care for the health, safety and wellbeing of themselves and other persons, and cooperating and complying with any reasonable health, safety and wellbeing policy, procedures or safety instruction.