We acknowledge the traditional custodians of this land, the Wurundjeri people, and pay our respects to the elders both past and present.

Occupational Health and Safety Policy		
Policy number: 5.2	Version: 3.0	Date of Issue: 28-05-2024
Authorised by: Chief Executive Officer	Distribution: All staff	Risk level: High
Date last reviewed: 15-02-2024	Reviewed by: Helen Spyt Agnes Loffeleya	Date of next review: January 2026

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COMMENCEMENT OF POLICY

This Policy will commence from 28 May 2024. It replaces all other San Carlo Occupational Health and Safety policies (whether written or not).

APPLICATION OF THE POLICY

This Policy applies to all 'workplace participants' at San Carlo, including employees, agency staff, volunteers, and contractors. This Policy does not form part of any employee's contract of employment, nor does it form part of any other workplace participant's contract for service.

DEFINITIONS

HEALTH AND SAFETY REPRESENTATIVE (HSR)

A Health and Safety Representative (HSR) is a person who has been elected by workplace participants to represent their Occupational Health and Safety (OH&S) issues and interests. They can speak on behalf of the workers or provide consultation to them regarding OH&S issues.

HSRs can be any person elected by the workplace participants, including officials from a Union, an industrial organisation, or the employer. Workplaces can have more than one HSR.

SAFETY DATA SHEET (SDS)

An SDS is a is a document that provides health and safety information about products, substances or chemicals that are classified as hazardous substances or dangerous goods. All products classified as such should come with an SDS. They contain information about:

- The product (its name, ingredients, and properties);
- Who manufactured or imported the product;
- How the product can affect your health; and
- How to safely use and store they product.

POLICY

San Carlo is committed to the prevention of work-related injuries and illness through maintaining a safe and healthy working environment for all employees, residents, and visitors, as outlined in the Victorian Occupational Health and Safety Act 2004 ('OH&S Act') and the Occupational Health and Safety Regulations 2017 ('OH&S Regulations'). This includes contractors and agency staff.

Employees undergo training and competency assessment relating to the lifting and handling of residents and the correct and safe use of equipment.

Any employee violating the provisions of the OH&S Act, wilfully ignoring policy or regulations, or acting in a way that endangers others will face disciplinary action. Disciplinary action can lead to dismissal.

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SAFETY OF SERVICES

The services offered by San Carlo are regularly reviewed for safety and efficacy. Our Continuous Improvement Policy (Policy 8.1) helps ensure that our services are updated in line with the safety needs of residents. Where incidents or near-miss events occur, these are documented and used to review how services are provided to residents.

OH&S OBJECTIVES

San Carlo has a duty to provide a safe and healthy workplace. This duty can only be effectively fulfilled through the assistance of workplace participants, who are expected to satisfy their responsibilities under this Policy and actively supporting San Carlo in health and safety initiatives.

As part of San Carlo's ongoing commitment to the health, safety, and welfare of all persons within the facility, the organisation aims to ensure that:

- Risks to health and safety are controlled;

- Workplace participants are provided with the necessary information, training, supervision, and instruction to competently and confidently perform their role without creating a risk to their own health and safety or that of other people;

- All relevant Occupational Health & Safety (OH&S) legislative requirements and Accreditation Standards relating to OH&S are complied with;

- Workplace participants, residents, and other relevant external parties are consulted regarding OH&S issues; and

- OH&S policies and procedures are available to workplace participants in hard and soft copy.

OH&S RESPONSIBILITIES

In order to achieve the organisation's OH&S objectives, San Carlo seeks the participation and cooperation of all workplace participants, contractors, residents, and visitors. Specific responsibilities are outlined below.

Board of Directors and Chief Executive Officer (CEO)

The San Carlo Board and CEO are ultimately responsible for providing a safe and healthy working and living environment. They have the responsibility of providing resources to the facility to assist in the implementation of the OH&S policy and procedures.

The **Board and CEO** are responsible for:

- The development, resourcing, implementation, audit, and continuous improvement of San Carlo's OH&S Management System;
    - To achieve these outcomes, the CEO has delegated accountability to Managers and Supervisors under this Policy.

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- Maintaining effective communication channels to inform anyone affected by San Carlo's activities of any circumstances which could affect their health and safety;

- Setting strategic OH&S objectives and conducting annual reviews to ensure targets are achieved;

- Providing sufficient resources to the facility to assist in the implementation of OH&S policy and procedures;

- Ensuring this policy and associated procedures are reviewed and updated regularly; and

- Ensuring appropriate signage is installed throughout the facility to safely guide staff, residents, and visitors to important areas (e.g. bathrooms, emergency exits).

Senior Management Team (SMT)

The **SMT**, within the scope of their individual roles, are responsible for:

- Contributing to the development and review of this policy;

- Formulating plans for the management and continual improvement of OH&S in consultation with key stakeholders;

- Ensuring San Carlo meets or exceeds its legal obligations regarding OH&S;

- Ensuring regular evaluation of San Carlo's safety performance;

- Confirming and allocating adequate resources to ensure a safe work environment;

- Contacting relevant statutory bodies in the event of a notifiable workplace incident (such as serious injury, dangerous occurrence, or death);

- Participating in the review of OH&S policies, procedures, and associated systems; and

- Periodically reviewing health and safety legislation in the event of changes or updates.

Physiotherapist

The **physiotherapist** is responsible for:

- Providing training and education to staff in regards to manual handling (in conjunction with the Executive Care Manager); and

- Compiling a monthly report on OH&S incidents for the CEO and Senior Management team to review.

Managers and Supervisors

Managers and supervisors are responsible for:

- Complying with legislative requirements and implementing the OH&S Management System within their area of responsibility;

- Monitoring and promoting OH&S within their area of responsibility;

- Participating in the resolution of OH&S issues;

- Where necessary, initiating and/or supporting a formal process that involves employee representation in operating OH&S systems;

- Communicating, consulting, and liaising regularly with workplace participants on OH&S matters;

- Participating in OH&S Committee meetings (where appropriate);

- Assisting in investigations of workplace incidents, reporting findings, and confirming necessary controls or actions have been undertaken;

- Initiating actions to improve OH&S within area(s) of responsibility;

- Maintaining records and documenting control of OH&S Management System procedures and forms (where relevant); and

- Assisting , where relevant, in the development and implementation of San Carlo's OH&S Training Program.

- Developing and implementing training programs that reflect the health and safety needs of workplace participants and other relevant individuals.

Workplace Participants

All **workplace participants** are responsible for:

- Adhere to safe working procedures and instructions;

- Work in a safe manner without risks to themselves or others;

- Report hazards, incidents, and near misses and complete any necessary reporting forms;

- Provide correct details of own skills, qualifications, and training;

- Undertake instructions as directed by Managers or Supervisors;

- Report any unsafe or faulty equipment, materials, and work practices;

- Attend and participate in OH&S training and/or meetings; and

- Cooperate with San Carlo's efforts to comply with legislation.

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Health and Safety Representatives (HSRs)

HSRs are responsible for:

- Monitoring the general activity on health, safety and welfare issues in San Carlo;
- Identifying and assessing OH&S hazards or risks;
- Advising the SMT on how to best control OH&S risks;
- Liaising with external agencies as required;
- Representing employees on OH&S issues;
- Investigate OH&S complaints by any employee, resident or visitor; and
- Participating in OH&S committees and meetings as appropriate;

Contractors and Volunteers

Contractors and volunteers are responsible for:

- Displaying due diligence in all activities;
- Following San Carlo's OH&S policies, procedures, and protocols;
- Completing a safety plan (for contractors – where required) and discuss with Environmental Services Manager before implementation;
- Completing site inductions and additional training (where required);
- Ensuring all staff under own supervision (including sub-contractors) are inducted onto the site; and
- Ensuring that all equipment and machinery used comply with the relevant regulations.

Residents and Visitors

San Carlo provides residents with a supportive home environment aimed at enabling them to make their own choices. However, the rights of residents to take some personal risk must not place workplace participants or other residents at risk of injury or ill health.

To help ensure a healthy and safe environment for all, capable residents, resident representatives, and visitors are asked to:

- Contribute their ideas and viewpoints on OH&S issues at Resident/Relative Meetings;
- Appreciate that all San Carlo procedures and tasks are designed with the wellbeing of residents and workplace participants in mind;
- Acquaint themselves and comply with the requirements of San Carlo's safety rules, as well as the Emergency Evacuation Plan;

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- Acknowledge that all workplace participants have the right to a healthy and safe working life and therefore cannot be expected to place themselves at risk of injury in their day-to-day work;

- Appreciate that OH&S considerations can mean that not all requests for services are able to be accommodated immediately or as expected or preferred; and

- Seek advice from workplace participants on OH&S implications of clothing, appliances, or other personal possessions before bringing such items into San Carlo.

PROCEDURE

IDENTIFYING HAZARDS

Hazards in the workplace can take many forms. Below is a table from SafeWork Australia[1] that outlines potential hazards and their effects

Hazard	Example	Potential harm	Risk Management
Manual tasks	Tasks involving sustained or awkward posture; high or sudden force; repetitive movements; and/or vibration.	Neuromuscular and/or musculoskeletal disorders (e.g. damage to joints, ligaments, tendons, and muscles; nerve damage as in carpel tunnel and sciatica)	'No lift' policy - Staff training in safe manual handling - Comprehensive resident assessment - Use and maintenance of appropriate equipment (e.g. lifting machines, trolleys) - Adjustable height desks. *Policies:* Occupational Health & Safety; Lifting Residents; Equipment Care and Maintenance.
Gravity	Falling objects; falls from height; and slips/trips of people (including workplace participants, visitors, and residents) *Note: If a residents' fall results in a fracture or their death, the incident*	Fractures, bruises, lacerations, dislocations, concussion, permanent injuries, or death	- Provide information regarding footwear to residents and workplace participants - Ensure spill kits and available and spills are cleaned promptly

[1] 'How to manage work health and safety risks: Code of Practice', Safe Work Australia, May 2018.

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	must be reported to WorkSafe		• Report slip/trip hazards as they are identified. • Maintain safety at all times when working at heights ***Policies:*** Cleaning; Occupational Health & Safety
Psychosocial	Excessive time pressure; bullying and harassment; sexual harassment violence; and work-related fatigue.	Psychological or physical injury or illness	• Access to Employee Assistance Program • Regular collection of staff feedback ***Policies:*** Bullying and Harassment; Occupational Violence and Aggression
Electricity	Exposure to live electrical wires	Shock, burns, damage to organs and nerves leading to permanent injuries or death	• Regular maintenance, safety checks, and tagging of electrical equipment. ***Polices:*** Equipment Care and Maintenance
Machinery and equipment	Being hit by moving vehicles or being caught in moving parts of machinery	Fractures, bruises, lacerations, dislocations, permanent injuries or death	• Use tractor and "Thomas" • Service lifts regularly to ensure compliance with worksafe regulations (certificate required) • Securely store equipment that could cause harm if not used correctly • Regularly service equipment (including lifting machines and medical equipment) ***Policies:*** Equipment Care and Maintenance; Lifting Residents

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Hazardous chemicals	Acids, hydrocarbons, heavy metals, asbestos, silica, cytotoxic medications/waste	Respiratory illnesses, cancers or dermatitis, burns, death	• Keep Safety Management Systems (SMS) up to date • Clear policy and procedures on how to use chemicals • Train staff in safe chemical handling and use (including regular refresher training) • Provide staff with sufficient and appropriate PPE to use when handling chemicals. *Policies:* Infection Control; Standard Precautions; Cytotoxic Medication; Cleaning
Extreme temperatures	Heat and cold	Heat can cause burns and heat stroke or injuries due to fatigue Cold can cause hypothermia or frost bite	• Provide appropriate PPE for staff working outdoors or in extreme temperatures *Policies:* Heatwave
Noise	Exposure to loud noise	Permanent hearing damage	• Use appropriate PPE when working in loud environments. *Policies:* Service Environment
Radiation	Ultra violet, welding arc flashes, micro-waves, and lasers	Burns, cancer or blindness	• Regularly service equipment • Train staff in hazards and equipment use • Use appropriate PPE *Policies:* Standard Precautions; Equipment Care and Maintenance

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Biological	Exposure to allergens or infectious micro-organisms (e.g. Hepatitis, legionnaires' disease, Q fever, HIV/AIDS, COVID-19, flu, norovirus)	Acute and/or chronic illness, hospitalisation, death	• Clear infection control policies and procedures • Staff education • Use appropriate PPE *Policies:* Infection Control; Standard Precautions; Transmission-Based Precautions; Outbreak Management

Other things to consider when reviewing the environment for OH&S risks include:

- Does the work environment enable workers to carry out work without risks to health and safety (e.g. is there space for unobstructed movement, adequate ventilation, lighting)?

- How is work performed, including the physical, mental and emotional demands of the tasks and activities?

- How suitable are the tools and equipment for the task, and how well are they maintained?

- How do workplace participants interact and how are inappropriate behaviours or conflicts dealt with?

Workplace participants should monitor their environment for any possible hazards and ensure that such hazards are reported in a timely manner.

Risk Assessment

Once made aware of a hazard, the SMT and OH&S Committee conduct a risk assessment and implement appropriate control strategies. A full explanation of the risk assessment process is outlined in the Risk Manual (Policy 8.9).

Attachment A provides some resources for conducting this assessment.

REPORTING HAZARDS

When a hazard is identified, a Hazard Alert form must be completed. A digital copy of this form can be located on the desktop of all San Carlo computers.

When completing this form, the following details must be recorded:

- Date and time of the report;

- Person completing the report;

- Location and description of the hazard;

- Risk assessment of the hazard (i.e. what is the severity of the possible consequences and how likely are they to occur?);

- Actions taken to control or reduce the risk; and

- Whether maintenance staff have been informed or need to be informed.

The completed form can be emailed to the Senior Management Team as smt@sancarlo.com.au or printed and handed in to reception.

If the hazard is high risk, a member of Senior Management should also be contacted directly and informed of the risk. If it is outside of regular business hours, the Nurse in Charge should be informed.

Emergencies and Immediate Danger

If a hazard poses immediate risk to the safety of residents, visitors, and/or workplace participants, a senior staff member must be informed as soon as possible. Workplace participants should keep people away from the hazard until the danger has subsided.

A Hazard Alert form should be filled in once it is safe and appropriate to do so.

In emergency situations (e.g. fire, flood), emergency procedures must be followed. These procedures are outlined in the Emergency Management Plan. Copies of the plan are kept at the nurses' station on all units.

INCIDENTS

When an OH&S incident occurs, it must be reported to a HSR or member of the SMT. This includes near-miss incidents.

A 'Staff Incident and Accident Report' form should be completed and emailed to the SMT as soon as possible after the incident.

The SMT must thoroughly investigate all OH&S incidents. This includes, but is not limited to:

- Conducting interviews with affected parties;

- Assessing the cause of the incident;

- Reviewing current control measures for effectiveness; and

- Implementing improved control measures to prevent recurrence of the incident.

Further information on incident reporting and management can be found in the Incident Management policy and procedure (Policy 8.9.1).

Resident Falls

If a resident falls and sustains a fracture or passes away as a result of the fall, the incident must be reported to WorkSafe and the Aged Care Complaints and Safety Commission.

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CONTROLLING HAZARDS

The following strategies can be used to control OH&S hazards:

- **Work procedures** - Develop a safe work procedure that describes the task, identifies the hazards and documents how the task is to be performed to minimise the risks.

- **Training, instruction and information** - Train workplace participants in the work procedure to ensure that they are able to perform the task safely.

  - Training should require workers to demonstrate that they are competent in performing the task according to the procedure.

  - Training, instruction and information must be provided in a form that can be understood by all workers.

  - Information and instruction may also need to be provided to others who enter the workplace, such as visitors.

- **Supervision** – Supervise workplace participants while they perform certain risky tasks.

  - The level of supervision required will depend on the level of risk and the experience of the workplace participants involved.

  - High levels of supervision are necessary where inexperienced workplace participants are expected to follow new procedures or carry out difficult and critical tasks.

- **Maintenance** – Regularly review and update risk control measures to ensure they remain effective.

  - A schedule for routine checks and maintenance should be established. It can also be helpful to prepare a risk register (see Attachment B)

Signage

Signs are posted in convenient areas of the facility to guide residents, staff, and visitors to important areas such as bathrooms and units. These signs are labelled in both English and Italian to aid our residents in finding their way around. All bathroom doors are also identified in both English and Italian.

All potential risks and hazards must be identified and marked with appropriate signage.

This can include signage such as:

- Warning signs next to equipment that requires proper training to use correctly (e.g. lifting machines);

- Out of order signs on malfunctioning equipment;

- 'Wet Floor' signs around areas where a spill has occurred; and

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- 'PPE Required' signs in areas where there is risk of exposure to hazardous chemicals or infectious diseases.

Notices regarding known hazards are displayed clearly in public areas. Workplace participants should ensure that any unmarked hazards they identify are reported to the SMT and Maintenance as soon as possible.

All signs used to convey information and/or instructions to residents and visitors at San Carlo must be approved by a member of Senior Management before being displayed.

General

Workplace participants must ensure that their surrounding environment and facilities are safe for other workplace participants, residents and visitors. Any activities must be done with consideration for the safety of other's present in the workplace.

Workplace participants must endeavour to keep all passageways, doorways, floors, and handrails free from obstructions at all times.

Workplace participants are required to wear correctly fitted and appropriate footwear and clothing. Residents and visitors are encouraged to do the same.

Safety for Residents and Visitors

All furniture and belongings in residents' rooms must be appropriately positioned to allow for easy access and to avoid obstructing the walking area. Any broken furniture or fittings must be documented and marked for repair. Broken furniture must not be used by staff or residents.

Furniture and fittings provided by residents or contracted organisations must be safe for use and suitable for the function they are intended to serve. If a piece of furniture poses a risk to a resident or does not suit their needs, it should be replaced with more suitable furniture.

All residents' belongings are stored appropriately and items brought into the facility are reviewed for safety by an HSR. Electrical items are to be checked by a qualified technician.

Nurse-call systems are provided to residents if they are able to use the system. Those who are unable to use a nurse-call system are regularly monitored by care staff.

Cleaning

All spills are cleaned promptly by an appropriately trained staff member, ensuring safety gear is worn while doing so.

When cleaning is in progress, signage must be appropriately displayed (e.g. 'use of Wet floor' signs). Cleaning equipment is handled and stored in a safe manner at all times.

All chemicals are correctly stored, maintained, labelled, and used in accordance with the manufacturers' instructions. Safety Data Sheets (SDS) are available for all chemicals used at the facility.

For more details, see the Cleaning policy and procedure (Policy 5.1.1).

RELATED POLICIES AND PROCEDURES

POLICIES AND PROCEDURES

- 3.2 Resident Risk Management
- 3.5 Infection Control
- 3.8 Mobility and Falls
- 3.8.1 Bed Pole Use
- 4.3.1 Lifting Equipment
- 4.7 Heat Wave
- 5.2.1 Occupational Violence and Aggression
- 7.4 WorkCover and Return to Work
- 7.6 Dress Code and Uniform
- 7.14 Staff Development and Training
- 7.17 Bullying, Discrimination & Harassment
- 7.22 Drug and Alcohol Use
- 8.1 Continuous Improvement
- 8.9 Risk Manual
- Emergency Management Plan

LEGISLATION AND AGREEMENTS

- *Fair Work Act 2009* (Cth.)
- *Occupational Health and Safety Act 2004* (Vic)
- *Occupational Health and Safety Regulations 2017* (Vic)
- *Workplace Injury Rehabilitation and Compensation Act 2013* (Vic)
- *Workplace Injury Rehabilitation and Compensation Regulations 2014* (Vic)
- *Accident Compensation Act 1985* (Cth)
- *Human Rights and Equal Opportunity Commission Act 1986 (Cth)*
- *Sex Discrimination Act 1984 (Cth)*

DOCUMENT VERSION CONTROL AND REVIEW HISTORY

Version	Date	Sections Modified	Author	Approved By	Next Review
1.0	01-07-2018	All	San Carlo	Rhonda Joiner	July 2019
1.1	01-10-2019	All	San Carlo	Rhonda Joiner	October 2020
2.0	14-01-2021	All	San Carlo	Rhonda Joiner	January 2023
3.0	28-05-2024	All	San Carlo	Rhonda Joiner	January 2026

AUTHORITY

This policy is authorised under delegation by:

Rhonda Joiner
Chief Executive Officer

ATTACHMENT A – RISK ASSESSMENT RESOURCES

Likelihood is a description of probability and frequency. It asks: What are the chances of the risk occurring? (See Table 1 below)

Consequence is the likely outcome of an event or situation, which is categorised by the impact it would have on daily activities or functions. It asks: What will happen if this event occurs? (See examples in Table 2 below)

Risk Matrix

	Consequences					Legend	
Likelihood	**1** Insignificant	**2** Minor	**3** Moderate	**4** Major	**5** Catastrophic		
5 (almost certain)	M (6)	H (7)	H (8)	E (9)	E (10)	**E 9 – 10**	Extreme risk Immediate action
4 (likely)	M (5)	M (6)	H (7)	H (8)	E (9)	**H 7-8**	High Risk Senior Management attention needed
3 (moderate)	L (4)	M (5)	M (6)	H (7)	H (8)	**M 5-6**	Moderate Risk Management responsibility must be specified
2 (unlikely)	L (3)	L (4)	M (5)	M (6)	H (7)		
1 (rare)	L (2)	L (3)	L (4)	M (5)	M (6)	**L 1-4**	Low Risk Manage by routine procedures

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Table 1 – Likelihood

Level	Qualitative Category	Qualitative descriptor	Semi quantitative frequency	Quantitative probability	Effectiveness of Controls
5	Almost certain	Is expected to occur every year or in most circumstances	Several have occurred within San Carlo in the last year	95% chance of occurring	Inadequate or difficult to know
4	Likely	Will probably occur in most years or circumstances	Has occurred within San Carlo in the last year	50% - 95% chance of occurring	Average
3	Possible	Might occur at some time within the next 5 years	Has occurred within San Carlo in the last 5 years	< 50% chance of occurring	Good
2	Unlikely	Could occur at some time	Has not occurred in San Carlo in last 5 years but has occurred in similar organisations within the last 10 years	<1% chance of occurring	Very good
1	Rare	May occur only in exceptional circumstances	Has not occurred in San Carlo in last 10 years but has occurred in similar organisations	<0.01% chance of occurring	Excellent (and proven to be so)

Table 2 – Consequence

Severity/Impact	1 Insignificant	2 Minor	3 Moderate	4 Major	5 Catastrophic
Service Delivery (Operational processes)	No service disruption Minimal or no operational impact, no remediation required	Minimal service disruption Reversible operational impact (no continuing operational implications)	Total service cessation for one week - subsequent disruption Moderate irreversible operational impact (process change implications)	Disruption of multiple services over several months Severe irreversible operational impact (process change required)	Total cessation of multiple services for several months Critical operational disruption (process change required)
Resident	The impact of the event can be absorbed through normal activity with minimal cost	Consequences can be absorbed by extra activity to minimise the impact, but	A significant impact on many residents that can be managed under normal circumstances	A critical impact on a resident/reside nts requiring extensive effort from	A disaster with the potential to lead to the loss of accreditation or irreversible

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Severity/Impact	1 Insignificant	2 Minor	3 Moderate	4 Major	5 Catastrophic
		effort is needed from management		management to help mitigate	impact on a resident's care.
Safety (residents, staff, contractors, suppliers)	First aid treatment required	Medical treatment required	Several medical treatments required	Serious injuries or a single fatality	Multiple fatalities
Environment (human & natural)	Transient toxic release that can be easily cleaned up Transient health impact on a population	On-site toxic release immediately contained, but which could have been much worse Short-term health impact on a population	On-site toxic release with permanent impacts or contained with outside help Moderate long-term health impact on a population	Off-site toxic release with no detrimental long-term effects Major long-term health impact on small population	Off-site toxic release with detrimental long-term effect Major long-term health impact on significant population
HR	Minimal/no staff impact, no remediation required	Minor/reversible staff impact (no continuing operational/morale implications)	Moderate irreversible staff impact (change in management or morale implications)	Severe irreversible staff impact (change in management or recruitment implications)	Critical staff impact (operational disruption, resignations, culture implications)

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ATTACHMENT B – RISK REGISTER TEMPLATE

Location: Click or tap here to enter text.

Date: Click or tap here to enter text.

Hazard	What is the harm that the hazard could cause?	What is the likelihood that the harm would occur?	What is the level of risk?	How effective are the current controls?	What further controls are required?	Actioned by	Date Due	Date Complete	Maintenance and review

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