Policy #P1.0

Workplace Health, Safety and Wellbeing Policy

1 Introduction

Mercy Education Limited (**MEL**) is committed to providing a safe, healthy, and supportive work environment for all personnel. This commitment is grounded in the Mercy tradition and the core values of **Compassion, Justice, Respect, Hospitality, Service** and **Courage**, and in MEL's commitment to integrity and ethical behaviour.

Health, safety and wellbeing at MEL includes both physical safety, psychological health and overall wellbeing. Workplace factors that may affect mental wellbeing are managed with the same priority as physical hazards.

MEL seeks the highest level of protection reasonably possible for students, staff, contractors, families, volunteers and visitors against harm to their health, safety and wellbeing; and is committed to maintaining a safe and healthy work environment. MEL does this by ensuring compliance with all legislative and regulatory requirements and fostering a culture where staff and management consult and collaborate to identify hazards, assess Risks, and implement effective measures to eliminate or reduce those Risks, as far as is reasonably practicable. MEL applies a harmonised system wide framework adapted to local legal requirements.

This Policy complements, but does not replace, the MEL Critical Incident Management Plan and the MEL Child Safety and Wellbeing Policy, which governs student safety and wellbeing.

2 Purpose

This Policy establishes the framework through which ensures MEL:

- Meets its legislative and regulatory obligations to ensure the health, safety, and wellbeing of all personnel;
- Integrates workplace health and safety, psychosocial Risk management, and staff wellbeing initiatives into a single, cohesive framework;
- Identifies, assesses, and manages Risks that may impact health, safety, or wellbeing;
- Clarifies the roles and responsibilities of staff, leaders, and management in relation to health, safety and wellbeing; and

- Promotes a safe, respectful, and supportive culture grounded in MEL values, the Mercy tradition and traditions of the Catholic Church.

3 Policy Application

This Policy applies to:

- All personnel engaged by MEL, including employees, contractors, volunteers, work experience students, consultants, Board members, and others performing work for the organisation; and
- All activities conducted by or on behalf of MEL, including on campus, offsite, and remote learning/work arrangements.

For the purposes of this Policy, MEL workplaces include MEL Colleges, the Mercy Education National Office (**MENO**), and any other locations where MEL personnel perform work. Where operational requirements are expressed at College level, equivalent processes apply in non school workplaces proportionate to the nature and scale of those workplaces.

4 Principles

MEL is deeply committed to fostering a workplace that prioritises health, safety and wellbeing (**HSW**) for all employees, students, and those we interact with including parents, carers, visitors, community, contractors and those in religious ministry. We recognise the importance of ensuring each person feels safe in the workplace and while at school; and that this safety is critical to Catholic education.

MEL applies the following principles to health, safety and wellbeing management, grounded in the organisation's values and the Mercy tradition:

- **Compassion and Respect:** The dignity, psychological safety, and physical wellbeing of all personnel are recognised and protected.
- **Justice and Fairness:** Systems for managing HSW are transparent, equitable, and applied consistently.
- **Hospitality and Service:** Leaders actively listen, respond, and support personnel and students in relation to HSW.
- **Courage:** Personnel are empowered to report hazards or unsafe practices without fear of reprisal.
- **Prevention First:** Risks are proactively managed rather than addressed only after incidents occur.
- **Risk-Based Approach:** Decisions are based on likelihood and severity of harm.
- **Consultation:** Personnel are consulted on matters affecting their HSW.
- **Integrated Systems of Work:** HSW are embedded into work and learning design, operational processes, workloads, and role/responsibility clarity. HSW procedures and processes are aligned with and supportive of child safety, student wellbeing, Risk management, assurance, and emergency and critical incident management.
- **Accountability and Due Diligence:** Leaders and officers are responsible for ensuring effective WHS governance and compliance for all personnel. We learn from our experiences and do what we say we will do, translating our HSW principles into responsible and effective work practices.

5 Commitment Statement

MEL, its Board, its management and Colleges, are committed to:

- providing a safe and healthy environment for staff, students, families, visitors and contractors;
- eliminating hazards and reducing WHS Risks to the extent reasonably possible, to prevent work related injury and ill-health;
- proactive and positive management of mental health, psychosocial, and wellbeing Risks;
- ensuring compliance with all relevant legislation and obligations;
- providing information, training and supervision to employees and other relevant parties;
- consulting with staff (and their representatives), managers and other stakeholders on WHS matters, and fostering a culture of engagement and communication;
- supporting injured staff to return to work as soon as possible; and
- continually improving WHS management systems and setting WHS objectives and measures that allow effective monitoring and improvement of performance.

6 Policy Requirements

6.1 Statutory Obligations

MEL holds the primary duty of care under applicable work health and safety and occupational health and safety legislation (as applicable) in each jurisdiction in which it operates. MEL, as a Person Conducting a Business or Undertaking (**PCBU**), is responsible for, so far as is reasonably practicable, maintaining a workplace that is safe and without Risks to physical and psychosocial health, safety and wellbeing.

MEL and its officers are legally accountable under WHS legislation, including for exercising due diligence to ensure these duties are met.

6.2 Roles and Responsibilities

MEL Executive Team acts on behalf of MEL in discharging organisational health, safety and wellbeing obligations. Responsibilities include:

- Establishing and maintaining system wide WHS framework, policies and minimum standards;
- Providing expert guidance and support to Colleges on hazard identification, Risk management and psychosocial Risk control;
- Ensuring system wide monitoring, reporting and analysis of incidents, hazards and emerging Risks;
- Ensuring each College implements this Policy effectively and consistently;
- Escalating material Risks to the Board and ensuring appropriate organisational responses;
- Supporting regulatory engagement and external reporting where required;
- Ensuring leaders and managers are appropriately trained in their health and safety responsibilities;
- Acting in a safe manner, and fulfilling their duties under relevant legislation; and
- Taking reasonable care for their own health, safety, and wellbeing.

Principals / School Leadership Teams are responsible for implementing MEL's health, safety and wellbeing systems at the College and exercising delegated managerial functions on behalf of MEL. Responsibilities include:

- Providing local leadership in promoting a safe, respectful and healthy College environment;
- Ensuring appropriate resources are in place to support a safe work environment for all personnel or escalated where additional resources are required;
- Ensuring hazards, including psychosocial hazards, are identified, assessed and controlled at the College;
- Reviewing effectiveness of controls regularly and after incidents;
- Implementing Risk controls consistent with MEL policies, procedures and minimum standards;
- Ensuring safe systems of work are developed and followed;
- Ensuring appropriate supervision of workers, contractors and volunteers;
- Supporting worker consultation and participation in health, safety and wellbeing matters;
- Ensuring incidents, hazards and near misses are reported, recorded and investigated in accordance with MEL processes;
- Escalating Risks that cannot be adequately controlled at College level;
- Supporting injured or unwell workers in line with return to work and wellbeing processes;
- Providing and maintaining safe equipment, tools, vehicles, chemicals and other items including personal protective equipment;
- Ensuring College staff are trained and aware of hazard management procedures;
- Leading consultation processes with personnel;
- Reporting significant Risks or incidents to the Executive Team;
- Acting in a safe manner, and fulfil their duties under relevant legislation; and
- Taking reasonable care for their own health, safety, and wellbeing.

All Colleges must elect a **Health and Safety Representative** (**HSR**). Responsibilities include:

- Participating in hazard identification, Risk assessment, and consultation on control measures;
- Supporting personnel in raising concerns and reporting Hazards;
- Providing feedback on the effectiveness of implemented controls;
- Acting in a safe manner, and fulfil their duties under relevant legislation; and
- Taking reasonable care for their own health, safety, and wellbeing.

Managers and Supervisors at all levels share responsibility for implementing this Policy in areas under their control. Responsibilities include:

- Identifying and managing physical and psychosocial hazards in their areas;
- Ensuring workers understand safe work practices and behavioural expectations;
- Monitoring workload, work practices and workplace behaviours that may impact health and wellbeing;
- Consulting with workers about Risks and control measures;

- Taking reasonable steps to prevent and address inappropriate workplace behaviours;
- Reporting and responding to incidents and hazards promptly;
- Acting in a safe manner, and fulfil their duties under relevant legislation; and
- Taking reasonable care for their own health, safety, and wellbeing.

Personnel includes employees, contractors, volunteers, work experience students and consultants. Responsibilities include:

- Acting in a safe manner, and fulfil their duties under relevant legislation;
- Taking reasonable care for their own health, safety, and wellbeing;
- Understanding and complying with this Policy;
- Following safe work procedures, use controls correctly, and participate in training;
- Reporting Hazards, incidents, concerns, Near Misses or Risks as soon as practicable, and taking action to control hazards where possible; and
- Participating in consultation processes and providing feedback.

6.3 Hazard and Risk Management Process

To proactively take steps that protect personnel, MEL implements a structured Risk management process to:

- Identify hazards (physical, psychosocial, and wellbeing Risks);
- Assess Risks (likelihood and severity);
- Eliminate Risks where reasonably practicable;
- Minimise Risks using the hierarchy of controls;
- Implement and maintain control measures; and
- Review controls regularly or when circumstances change.

Identification of Hazards

Each MEL College will proactively identify Hazards through regular observation, surveys, complaints data, incident trends, absenteeism, and consultation with all personnel.

At least once per school term, a safety observation tour of the College campus must take place to proactively identify hazards.

Examples of possible Hazards, include, but are not limited to:

- Aggression or violence from students, parents, or visitors;
- Bullying or harassment by personnel or students;
- Sexual harassment;
- Exposure to traumatic events or distressing material;
- High job demands or workload;
- Low role clarity;
- Work design;
- Poorly managed organisational change;
- Low recognition or reward;
- Remote or isolated work;
- Poor organisational justice or perceived unfairness;

- Noise;
- Working at heights or confined spaces;
- Asbestos;
- Slips, trips and falls;
- Lifting, pushing and pulling (manual tasks);
- Chemicals or carcinogens;
- Working in heat; and
- Electricity.

Each MEL College will maintain a risk register to document the identified hazards, assessment of associated Risks and control measures implemented to eliminate or mitigate the Risks.

Assessment of Risks

The Risks associated with all identified Hazards must be assessed by each MEL College using a risk assessment process. Risk assessments must evaluate the severity and likelihood of harm. In assessing severity and likelihood, Colleges must take into account relevant contextual factors, including, but not limited to:

- the frequency of exposure to the hazard;
- the duration of exposure for personnel;
- the nature of the work or role affected, including roles with higher inherent exposure to risk;
- whether particular employees may be more vulnerable to harm due to workplace, health, situational or role related factors; and
- the presence of Power Imbalances that may increase the likelihood or impact of harm.

Assessments will be formally documented, and Risks prioritised for control measures.

Control of Risks

Where Hazards have been identified a control measure should be developed and implemented to eliminate or mitigate the associated Risks by reducing the severity or likelihood of harm. To achieve this, MEL Colleges must apply the Hierarchy of Controls, adapted for Hazards:

- **Elimination**: Remove the source of Risk wherever reasonably practicable.
- **Substitution / Redesign**: Redesign tasks, roles, or work environments to reduce Risk.
- **Engineering / Adjust**: Modify existing processes, provide additional resources to meet demands, substitute tasks with safer alternatives, or alter reporting lines.
- **Administrative / Educate**: Implement policies and procedures and train personnel to understand expectations.
- **Promotion**: Provide access to wellbeing programs, counselling, and resilience-building initiatives as supplementary supports.

Once control measures have been identified and implemented, they should be monitored regularly to ensure their effectiveness.

6.4 Consultation, Communication and Support

Consultation with personnel and HSRs will occur at all stages: identifying hazards, assessing Risks, deciding on controls, implementing controls, and reviewing effectiveness. Consultation must be genuine, timely, and documented.

We consult, co-operate and co-ordinate activities with staff, students, contractors and external stakeholders on health, safety and wellbeing matters and encourage their participation in, and commitment to, HSW performance improvement initiatives and practices.

The primary consultative forum for each College is the College WHS Consultative Committee whose members will include School Leaders and HSR's.

Additionally, MEL Colleges promote staff wellbeing by:

- Supporting reasonable workloads and work-life balance;
- Providing access to counselling and wellbeing programs;
- Providing online training programs related to occupational health and safety and mental health and wellbeing;
- Encouraging early reporting of hazards or wellbeing concerns;
- Maintaining trauma-informed and respectful grievance processes; and
- Promoting respectful workplace behaviour.

These initiatives complement, but do not replace, Risk elimination or minimisation duties.

6.5 Reporting and Incident Management

MEL is committed to implementing systems and practices that best serve our schools, staff and students.

Where personnel have sustained an injury at work or experienced a Near Miss, these should be reported to their Supervisor/ Manager as soon as practicable.

All Critical Incidents must be reported pursuant to MEL's Critical Incident Management Plan Policy. Where appropriate and as required, relevant regulatory authorities are notified using the localised processes outlined.

All workplace injuries, incidents (e.g.: harmful chemical spill), Near Misses and psychosocial concerns must be reported through the MEL incident management system.

Reports are managed promptly, confidentially where appropriate, and without victimisation.

6.6 Documentation and Review

Records of hazard identification, Risk assessments, controls, consultations, and reviews must be maintained by each MEL College. Controls will be reviewed by each MEL College regularly, after incidents, or when circumstances change, to ensure ongoing effectiveness.

6.7 Hazard Management Process – College Level Operational Responsibility

Function	Mercy Education (Legal Duty Holder)	Executive Team / MENO (Governance & Oversight)	College Principal (Local Implementation)	Managers / Supervisors (Operational Control)
WHS framework and policy	Accountable for establishing and maintaining system	Develops, maintains and reviews framework	Implements at College	Applies in daily work
Hazard identification	Ensures system exists	Provides tools, guidance and monitoring	Ensures hazards are identified locally	Identifies hazards in their areas
Risk assessment	Accountable for process	Provides methodology and oversight	Conducts or ensures local assessments	Participates and applies controls
Risk controls	Ensures appropriate controls across system	Sets minimum standards and reviews adequacy	Implements controls at College	Enforces controls day to day
Psychosocial Risk management	Accountable under WHS duty	Monitors trends and supports controls	Manages workload, behaviours, local culture	Observes and addresses local Risks
Incident reporting and investigation	Accountable for compliance	Monitors, reviews and escalates	Ensures incidents are reported and investigated	Reports and assists
Consultation	Must ensure mechanisms exist	Establishes consultation framework	Facilitates consultation at College	Engages with workers
HSR arrangements	Facilitates system compliance	Oversees process	Supports HSRs locally	Cooperates
Training and capability	Ensures adequate training system	Develops and provides training	Ensures staff attend	Reinforces learning
Monitoring and assurance	Ultimately accountable	Conducts oversight and reporting	Provides data and implements improvements	Cooperates

7 Implementation

MEL School Leadership teams are responsible for operationalising this Policy for all personnel at College level. The MEL School Leadership teams must ensure all personnel are aware of hazards, controls, and reporting mechanisms.

Training and education programs will be provided to all personnel on health, safety and wellbeing Risk awareness and management.

Reporting structures and support mechanisms will be accessible, confidential, and trauma-informed.

8 Failure to Comply with this Policy

Failure to comply with this Policy may lead to disciplinary action, up to and including, dismissal or discontinuation of engagement. It may also lead to regulatory action or carry officer liability under WHS legislation.

9 Definitions

Term	Definition
Contractor	A contractor includes all external parties engaged by MEL to undertake work, including contractors, consultants, labour hire, other paid attendees at schools and offices, and external service providers where MEL employees or students attend the premises or activities of those service providers
Executive Team	Senior leadership team of MEL, including the CEO and other senior executives as per the MEL organisational chart
Hazard	Hazards are anything that has the potential to cause harm to a person's health and safety in the workplace
Hierarchy of Controls	Systematic approach to eliminating or minimising exposure to hazards
HSR	Health and Safety Representative; An elected employee responsible for representing employees within a designated work group on matters relating to occupational health and safety
HSW	Health, Safety and Wellbeing
MEL	Mercy Education Ltd (ABN 69 154 531 870)
MENO	MEL National Office personnel
Near Miss	Any event or situation that, by chance or timely intervention, did not cause harm, but could reasonably have resulted in injury, illness, or damage if circumstances had been slightly different
Personnel	All individuals engaged by MEL, including employees, contractors, volunteers, work experience students, consultants, Board members, and others performing work for the organisation
Policy	P1.0: Workplace Health, Safety and Wellbeing Policy, this document
Power Imbalance	A situation where there is a real or perceived difference in authority, influence, decision making power, control over work, or dependency between individuals, which may limit a person's ability to raise concerns, refuse unsafe work, report inappropriate behaviour, or protect themselves from physical or psychological harm
Principal	Principal of a MEL-governed College

Psychosocial Hazard	Anything in the workplace which may cause a person to have a negative psychological response, leading to psychological, and or, physical harm
Reasonably Practicable	Actions reasonably able to be taken to ensure health and safety, considering likelihood, severity, knowledge, availability, and cost of control
Risk	The chance of harm (death, injury or illness) occurring from exposure to a hazard, based on likelihood and severity of harm.
RISKCOM	The Risk and Compliance Committee of the MEL Board
School Leadership	Any person within a MEL school who holds a position of leadership or supervisory responsibility, including the Principal, Deputy Principals, Heads of Department, Managers and any staff member with designated responsibility for the management, supervision, or welfare of students or staff
WHS	Work Health and Safety

10 Related Documents

This Policy should be read in conjunction with the following MEL documents

- Codes of Conduct
- Complaints Management Policy
- Critical Incident Management Plan
- Child Safety and Wellbeing Policy
- Child Safety and Wellbeing Reporting Policy
- Diversity, Equality and Inclusion Policy
- Sexual Harassment Policy
- Psychosocial Hazard Regulations State Comparison – MEL Guidelines

Related legislation, regulations and standards

- National:
    - *Work Health and Safety Amendment (Managing Psychosocial Risk and Other Measures) Regulations 2022* (Cth)
    - *Work Health and Safety Act 2011* (Cth)
    - Code of Practice on Managing Psychosocial Hazards at Work – Safe Work Australia
- Victoria:
    - *Occupational Health and Safety Act 2004* (Vic)
    - *Occupational Health and Safety Regulations 2017* (Vic)
    - WorkSafe Victoria guidance on managing psychosocial hazards
- Western Australia:
    - *Work Health and Safety Act 2020* (WA)
    - *Work Health and Safety (General) Regulations 2022* (WA)
    - WorkSafe WA guidance on managing psychosocial hazards
- South Australia:
    - *Work Health and Safety Act 2012* (SA)
    - *Work Health and Safety Regulations 2012* (SA)
    - SafeWork SA guidance on psychosocial Risk management

11 Evaluating this Policy

Policy effectiveness will be measured through RISKCOM reporting, compliance audit outcomes, training completion data, incident reporting trends, and stakeholder feedback.

12 Policy Review History

This is the fourth version of this Policy. The Policy was prepared in consultation with the MEL Executive Team before being presented to RISKCOM for recommendation to the Board.

Substantial revisions bring the format of this Policy into alignment with the new MEL Policy and Implementation Framework developed in early 2026.

This Policy will be reviewed in accordance with the MEL Policy and Implementation Framework, at least every three years, or earlier if required to:

- ensure that it remains current with respect to legal and regulatory requirements;
- ensure complaints are appropriately recorded, investigated and responded to;
- ensure that it operates effectively; and
- confirm whether any changes are required.

Any amendments to this Policy must be done in consultation with the Executive Team, endorsed by RISKCOM and approved by the MEL Board.

Version	Date Released	Next Review	Executive Sponsor	Approved
1.0	Sept 2017	Mar 2020	Risk & Compliance Leader	MEL Board
2.0	Mar 2020	Mar 2023	Risk & Compliance Leader	MEL Board
3.0	May 2023	May 2026	Head of People & Culture	MEL Board
4.0	May 2026	May 2029	Head of Legal	MEL Board