



# Safety & Wellbeing Policy

nbn: Commercial  
15 December 2023  
Owner: Safety, Wellbeing & Governance (People & Culture)



# Policy Overview



## Introduction

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This policy outlines [nbn](#)'s commitment to providing a safe, healthy, and respectful workplace and commitment to achieve a safe and sustainable return to work in the event of a work-related injury or illness.

We consciously create and maintain an inclusive environment where all our people feel empowered, safe, respected, have a sense of belonging, and can thrive and succeed.

## Why this is a policy

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**nbn**'s position on safety and wellbeing reflects **nbn**'s compliance with its statutory obligations, corporate best practice, maintaining public trust, and commitment to creating and maintaining a safe, respectful, inclusive, and purpose-led culture underpinned by **nbn**'s values.

This position also supports **nbn**'s [officers](#) in fulfilment of their due diligence obligations.

## Who does it apply to?

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This policy applies to **nbn** [workers](#), including [employees](#) and [contractors](#) in all **nbn** workplaces and working on behalf of **nbn**.

## Related policies and documentation

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- [Code of Conduct](#)
- Leave Policy
- Workplace Relations Policy
- Diverse, Respectful & Inclusive Workplace Policy
- **nbn** Safety Management System Standards and Guidelines
- Injury and Illness Management Procedure

## Key Takeaways

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- **nbn** is committed to providing and maintaining a safe, healthy, and respectful workplace that protects physical and psychological health, safety, and wellbeing.
- Through providing early intervention, and rehabilitation support, **nbn** commits to reducing the impact of physical and psychological harm, injury, and illness.
- **nbn** provides [reasonable workplace adjustments](#) for those recovering from a work-related illness or injury and is committed to providing an accessible and inclusive workplace for people with a [disability](#) or non-work-related illness or injury.

## What does this mean for you?

- You are responsible for and enabled to taking reasonable care of your own safety and wellbeing and ensuring that nothing you do (or fail to do) adversely affects the safety and wellbeing of other persons at work.
- You must report hazards and incidents, and undertake any required training.
- If ill or injured in the course of work or while undertaking work for **nbn**, you must actively participate in rehabilitation and return to work processes.
- Support is available in the event of a physical or psychological non-work-related injury or illness, or for people with disability, to enable an accessible and inclusive workplace for all.



# 1 Purpose

[nbn](#) is committed to doing everything reasonably practicable to prevent harm to [workers](#), visitors, and customers.

It is everyone's responsibility to act with care in:

- the way we look out for each other;
- the way we respect policies and procedures; and
- our interactions, ensuring that both psychological and physical safety is always front of mind; and
- we feel and act safe to speak and be an upstander to unsafe behaviours.

It is also everyone's responsibility to take reasonable care of their own safety and wellbeing, and that nothing you do (or fail to do) adversely affects the safety and wellbeing of other persons at work.

This policy exists to ensure that we demonstrate genuine care for all workers by enabling our people to understand their responsibilities in relation to safety and wellbeing.

This policy is also in place to ensure **nbn's** compliance with its legal, statutory, and regulatory obligations, including but not limited to, aspects of the following laws as they relate to safety and wellbeing:

- [Work Health and Safety legislation](#);
- Workers Compensation and Injury Management legislation;
- **nbn** employee contracts, including enterprise agreements; and
- **nbn** supplier agreements and [statements of work](#).

# 2 Scope

This policy applies to **nbn** workers, including [employees](#) and [contractors](#) in all **nbn** workplaces and working on behalf of nbn.

# 3 Policy

## 3.1 Principles

- **nbn** is committed to maintaining a safe, respectful, and inclusive workplace that protects the physical and psychological health, safety, and wellbeing of workers and others at, or near, our workplaces.
- In the event of a work-related injury or illness, **nbn** actively assists workers to achieve a physically and psychologically safe and sustainable return to work.
- Support is available in the event of a physical or psychological non-work-related injury or illness, or for people with [disability](#), to enable an accessible and inclusive workplace for all.

## 3.2 Objectives

Through the provision and maintenance of **nbn's** [Safety Management System](#)), **nbn** is committed to:

- Strong leadership and operational accountability in framing and driving safety and wellbeing outcomes.
- Maintaining processes and systems to ensure compliance with legislative obligations.
- Providing mechanisms to enable effective consultation and participation on matters affecting safety and wellbeing.
- Developing and maintaining mechanisms to enable the reporting, [investigation](#), and resolution of corrective actions associated with safety and wellbeing incidents and hazards.
- Providing appropriate training, information, instruction, supervision, and equipment to enable work to be conducted safely.
- Establishing mechanisms to routinely record, monitor, measure, and analyse safety and wellbeing performance.
- Monitoring safety and wellbeing effectiveness and performance against objectives and targets.



- Establishing and applying prequalification criteria and safety and wellbeing requirements for **nbn** suppliers and contractors that undertake high risk work or provide high-risk products and services to **nbn**.
- Regularly evaluating the continuing suitability and effectiveness of the **nbn** Safety and Wellbeing Management System and revising if required.
- Developing specific injury management and rehabilitation strategies for work-related injuries or illness, in consultation with injured or ill employees, **nbn**'s workers compensation insurer ([Comcare](#)), treating practitioner/s, approved workplace rehabilitation provider/s (where applicable), and relevant team members.
- Providing [reasonable workplace adjustments](#) following a work-related injury or illness and providing support for non-work-related injury or illness or those with disability, to enable workers to safely stay at, or return to work.
- Providing safe, healthy, and respectful workplaces and work-related events that are not compromised by the presence of people under the influence of alcohol or other drugs and are free of the use, sale, or possession of any illegal/prohibited substances.
- Maintaining processes to undertake drug and alcohol screening in defined circumstances which may include, but not be limited to pre-employment and post-incident screening.

### 3.3 Data and reporting

**nbn** proactively incorporates legislative change and government recommendations specific to safety and wellbeing outcomes. **nbn** monitors its performance in these areas using appropriate measures and targets. Progress is reported to, and discussed in various forums, including **nbn**'s [Board](#) and all our Stakeholders. These include but are not limited to our Executive Team, Audit & Risk Committee and People & Remuneration Committee and any other bodies as required by Public Sector Compliance Reporting.

### 3.4 Complying with this policy

The **nbn** [Safety Management System](#) (SMS) is accessible to all employees and certain contractors on **nbn**'s internal Safety and Wellbeing Hub site.

The **nbn** SMS consists of standards, procedures, instructions, and information that systematically manages safety and wellbeing at **nbn** and aims to eliminate, or if not possible, minimise the risk of injury and illness from work-related operations.

The **nbn** SMS also includes information on how we record, monitor, measure, and analyse safety and wellbeing performance.

The **nbn** SMS is designed in accordance with the Australian standard, AS/NZS ISO 45001:2018 (*Occupational health and safety management systems*).

Where a contractor does not have access to the **nbn** SMS on the internal Safety & Wellbeing hub site, relevant documentation is made available through other channels which may include, but not be limited to, email or shared technology platforms.

Workers are required to comply with the elements of the **nbn** SMS that are relevant to their role.

### 3.5 Consequence management

Where workers do not comply with this policy, disciplinary action may be taken up to and including termination of employment or contract in accordance with the Workplace Relations Policy and **nbn**'s [Code of Conduct](#).

### 3.6 This policy and your contract

You are required to comply with **nbn**'s [policies](#) as a condition of your agreement to work at **nbn**.

However, **nbn** policies do not form part of your agreement and may be varied from time to time.



## 4 Roles and responsibilities

The responsibilities in this table are in addition to any set out in the *Work Health and Safety Act 2011* (Cth).

Role	Responsibilities
Employees and contractors	<p>Employees and contractors have a responsibility to:</p> <ul style="list-style-type: none"><li>• Uphold the safety and wellbeing of themselves and each other by complying with <b>nbn's</b> Safety Management System.</li><li>• Respect each other and create an inclusive environment.</li><li>• Speak up when you are concerned that someone's safety or wellbeing may be at risk.</li><li>• Comply, so far as reasonably able, with any reasonable instruction given by <b>nbn</b> relating to safety and wellbeing.</li><li>• Report safety and wellbeing incidents, hazards, or issues and where possible, assist in their resolution; and</li><li>• If ill or injured in the course of undertaking work for <b>nbn</b>, actively participate in rehabilitation measures and return to work processes as advised by your <a href="#">People Leader</a> and/or People &amp; Culture.</li></ul>
People Leaders	<p><b>nbn managers</b> have the same responsibilities as employees and contractors, plus the following additional obligations:</p> <ul style="list-style-type: none"><li>• Ensure a safe, healthy, and respectful workplace for their workers;</li><li>• Lead, or participate in as required, in risk assessments, investigations, audits, inspections, training, consultative arrangements, reporting, and improvement planning in relation to safety and wellbeing for their area of responsibility; and</li><li>• Ensure knowledge and understanding of safety and wellbeing obligations and risks and ensure suitable controls are in place for their area of responsibility.</li></ul>
<a href="#">Officers</a>	<p>Officers have a responsibility to exercise due diligence to ensure that <b>nbn</b> meets its duties under <a href="#">WHS laws</a> by:</p> <ul style="list-style-type: none"><li>• <b>Knowing:</b> Acquiring and keeping up-to-date knowledge of work health and safety matters;</li><li>• <b>Understanding:</b> Understanding <b>nbn's</b> operations and related health and safety hazards and risks;</li><li>• <b>Resourcing:</b> Ensuring <b>nbn</b> has, and uses, the resources and processes to manage health and safety risks;</li><li>• <b>Monitoring:</b> Ensuring <b>nbn</b> has processes for monitoring health and safety incidents, hazards and risks and responding in a timely way;</li><li>• <b>Complying:</b> Ensuring <b>nbn</b> has and implements processes for compliance with WHS</li></ul>



Role	Responsibilities
	<p>legal duties; and</p> <ul style="list-style-type: none"> <li>• Verifying: Verifying the provision and use of <b>nbn</b>'s resources and processes to manage health and safety risks.</li> </ul>
<p>People &amp; Culture</p>	<p><b>nbn</b>'s People &amp; Culture team has a responsibility to:</p> <ul style="list-style-type: none"> <li>• Design, develop, and communicate appropriate organisational policies and supporting artefacts for the effective implementation of safety and wellbeing management, rehabilitation and return to work support, disability support, and workers' compensation claims management;</li> <li>• Maintain the Safety &amp; Wellbeing Management System and ensure availability of relevant information to affected parties, including, but not limited to, contractors;</li> <li>• Influence, coach, and enable consultation for the application of safety and wellbeing risk management; and</li> <li>• Undertake or facilitate verification of safety and wellbeing management systems and processes to ensure compliance with legislative and regulatory requirements and continuous improvement.</li> </ul>
<p>Property and Security</p>	<p><b>nbn</b>'s Property and Security teams have a responsibility to:</p> <ul style="list-style-type: none"> <li>• Embed Safety and Wellbeing considerations into physical site access and site management activities;</li> <li>• Ensure safe and appropriate access to <b>nbn</b> sites for all workers, visitors, contractors, and other third parties;</li> <li>• Ensure processes to protect and respond in emergency situations;</li> <li>• Respond to and/or escalate Safety and Wellbeing related risks, issues or complaints arising from <b>nbn</b> site-based activities; and</li> <li>• Consult with and/or escalate to relevant People and Culture team members on matters affecting the Safety and Wellbeing of those accessing <b>nbn</b> sites.</li> </ul>
<p>First Aiders Fire Wardens Health &amp; Safety Representatives</p>	<p>Those who also act as a First Aider, Fire Warden or Health and Safety Representative have a responsibility to:</p> <ul style="list-style-type: none"> <li>• Maintain knowledge and understanding of the scope of the role and the legislative requirements associated with the role;</li> <li>• Where relevant, undertake and maintain mandatory training / certification associated with the role;</li> <li>• If required, proactively seek clarification of processes, training, and role requirements, through the Safety &amp; Wellbeing hub and/or contact with relevant People and Culture team members.</li> </ul>



## 5 Policy approval

<b>Policy approver</b>	Board
<b>Policy endorser</b>	<a href="#">ARC</a> (9/11/2023), <a href="#">PRC</a> (16/11/2023)
<b>Version</b>	1.0
<b>Date approved</b>	15/12/2023
<b>Review cadence</b>	Annual
<b>Next review date</b>	December 2024

## 6 Version history overview

Additional detail regarding previous versions of this policy may be obtained from the Enterprise Compliance team. This policy will be periodically reviewed to check that it is operating effectively and whether any changes are required.

<b>Version</b>	<b>Date</b>	<b>Summary of change</b>
1.0	15/12/2023	Consolidation of: Drug & Alcohol Policy; Mental Wellbeing Policy; Rehabilitation & Return to Work Policy; and the safety and wellbeing aspects of the Health, Safety & Environment Policy. Formatting and style changes to align to refreshed <b>nbn</b> corporate policy template and approach.

## 7 Definitions

**ARC** means the Audit & Risk Committee of the Board.

**Board** means the nbn Board of Directors.

**Board Committee** means [ARC](#), [PRC](#), or another Committee of the Board.

**CEO** means the Chief Executive Officer.

**Comcare** means Comcare, nbn's workers compensation insurer.

**contractor** means [extended workers](#) and [temporary staff augmentation](#).

**DDA** means the *Disability Discrimination Act 1992* (Cth).

**Director** means a member of the **nbn** Board.

**disability** has the same meaning as under s 4(1) of [DDA](#) and can include physical, intellectual, psychiatric, sensory, neurological, and learning disabilities. Disability can be permanent or temporary, visible, or invisible.

**disability and discrimination laws** means DDA, *Disability (Access to Premises – buildings) Standards*



2010, [FW Act](#), and applicable State and Territory disability legislation.

**employee/s** means [permanent employees](#) and [maximum-term employees](#) of **nbn**.

**extended worker** or **extended workforce** (EW) means a non-employee (or multiple non-employees) performing work defined as such under the Recruitment & Employee Development Policy. The resource need is typically Outcome Based. **nbn** agrees with a third party to deliver an identified business outcome or project under a [statement of work](#)—that is, an agreement with a third party to supply services to **nbn**. EWs do not count as headcount within a business unit's Workforce Plan Budget (a consulting budget is required) and are managed by the **nbn** Procurement Team.

**FW Act** means the Fair Work Act 2009 (Cth).

**inclusion** exists where people are valued and respected and have a sense of belonging.

**investigation** means a formal process to examine a grievance or allegation. An investigation may be a simple inquiry, a review of written material, or a more formal assessment including interviews with witnesses.

**manager** refers to the person an employee or contractor reports to.

**maximum-term employee** means an employee employed for a maximum period.

**officer** has the same definition as referred to in the WHS laws and means a person who makes, or participates in making, decisions that affect the whole or substantial part of **nbn** and includes [Directors](#), secretaries and other persons who have capacity to significantly affect **nbn**'s financial standing.

**People Leader** means **nbn** [managers](#) who have direct teams and supervisory responsibilities.

**permanent employee** means a person directly employed by **nbn** on an ongoing basis.

**policies** mean **nbn**'s corporate policies, which focus on enterprise-wide principles and set out key roles and responsibilities. These documents are administered by Enterprise Compliance, and are approved by either the [CEO](#), a [Board Committee](#), or the Board.

**PRC** means the People & Remuneration Committee of the Board.

**reasonable workplace adjustment** may take the form of a change to a work process, practice, procedure, or environment that enables an employee with disability to perform their role in a way that minimises the impact of their disability where the making of such an adjustment does not impose an unjustifiable hardship on **nbn**.

**Safety and Wellbeing Business Partner** is a position responsible for strengthening and building safety and wellbeing capabilities throughout the organisation.





**Safety Management System (SMS)** means nbn's Safety and Wellbeing standards, procedures, instructions, and information, and is accessible to all employees and certain contractors via the Safety & Wellbeing hub site.

**statement of work (SOW)** means an agreement between nbn and a supplier that sets out the approved outcome or project scope with milestones and deliverables and what is expected of the supplier to enable the supplier to complete the work on schedule, within budget, and to the required standard of quality.

**temporary staff augmentation (TSA)** means a non-employee performing work defined as such under the Recruitment & Employee Development Policy. The resource need is typically Role Based. nbn agrees with a third party to payroll the non-employee and provide the services of the TSA to perform an identified, temporary role. TSAs count as headcount within a business unit's Workforce Plan Budget and are recruited by the nbn Talent Acquisition Team and are managed by nbn People Leaders.

"we" refers to nbn.

**WHS laws** means the *Work Health and Safety Act 2011*.

# WE ARE PURPOSE-DRIVEN

Through living our values, we fulfil our purpose of lifting the digital capability of Australia

