

Work Health and Safety Consultation, Cooperation and Coordination Policy

Version 3.0

Prepared by

People and Culture

September 2021

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Purpose

1.1.1 The purpose of this Work Health and Safety Consultation, Cooperation and Coordination Policy (Policy) is to inform all Australian Sports Commission (ASC) workers of the ASC's expectations concerning work health and safety (WHS) related consultation, co-operation and co-ordination activities. These expectations are consistent with the WHS Act), WHS Regulations and WHS Codes of Practice.

2. Scope

- 2.1.1 This Policy applies to all ASC workers and any other persons present on ASC worksites concerned with WHS consultation, co-operation and co-ordination activities. Workers and other persons include:
 - ASC employees
 - Athletes
 - Contractors and sub-contractors
 - Visitors, and
 - Members of the public.

3. Statement of intent

- 3.1.1 One of the objectives of the WHS Act is to foster a co-operative, consultative relationship between employers and workers about their health, safety and welfare at work. This is because it is widely accepted that:
 - A safe workplace is more attainable when everyone communicates with each other to identify hazards and risks, talks about health and safety concerns and works together to find solutions
 - By drawing on the knowledge and experience of workers, more informed decisions can be made about how to perform work safely, and
 - Effective WHS consultation promotes greater awareness, commitment and positive working relationships.
- 3.1.2 For these reasons, it is the ASC's intent to establish and actively maintain robust, efficient and effective WHS consultation, co-operation and co-ordination processes adopted by all ASC workers.
- 3.1.3 This Policy:
 - Provides ASC workers with clarity concerning their duty to consult with other duty holders and the ways and means through which they can exercise that duty
 - Provide practical guidance (e.g. information and mechanisms) on ways to promote worker participation and representation, and
 - Assist in facilitating compliance with legislation concerning consultation with other duty holders in a WHS context.

4. Guiding principles

- 4.1.1 The ASC will engage in consultation with its WHS duty holders on WHS matters, particularly when proposing changes or making decisions that may affect the health and safety of workers.
- 4.1.2 Knowledge, information and ideas are exchanged to enable a shared understanding of WHS matters, including WHS duties, risks and controls.

- 4.1.3 All workers are encouraged and supported to raise WHS concerns, respectfully express their views and report problems. In turn, these matters will be taken seriously.
- 4.1.4 Duty holders will not simply assume that someone else is responsible for, or going to take ownership of WHS.
- 4.1.5 All duty holders will 'lean in' and participate in WHS problem solving processes.
- 4.1.6 The ASC is committed to continued improvement of its WHS consultation, cooperation and coordination activities across the enterprise.

5. Roles and Responsibilities

5.1 Persons Conducting a Business or Undertaking

- 5.1.1 The ASC, as a PCBU, will consult, so far as is reasonably practicable, with workers who are (or are likely to be) directly affected by a WHS matter.
- 5.1.2 There are number of matters specified at s49 of the WHS Act about which the ASC must consult with workers. These are:
 - Identifying hazards and assessing risks arising from work
 - · Making decisions about ways to eliminate or minimise those risks
 - Making decisions about the adequacy of facilities for the welfare of workers
 - Proposing changes that may affect the health and safety of workers
 - Making decisions about the procedures for resolving health and safety issues
 - Monitoring the health of workers or workplace conditions, information and training or consultation with workers, and
 - Carrying out any other activity prescribed by the WHS Regulations.
- 5.1.3 In addition, where the ASC and its workers have agreed to procedures for consultation, the consultation must occur in accordance with those procedures.

5.2 Officers

5.2.1 ASC Officers have a duty to ensure that the ASC complies with the WHS Act and Regulations. This includes taking reasonable steps to ensure that the ASC implements processes for complying with the duty to consult workers as well as co-operating and co-ordinating activities with other duty holders.

5.3 Managers

- 5.3.1 Each Manager and Supervisor is required to:
 - Consult with relevant workers, contractors and visitors where there are any changes or proposed changes which will impact on the health and safety of ASC workers
 - Inform workers of the identity of their Health and Safety Representative (HSR) and/or WorkSafe Committee member, and
 - Ensure WHS communications are disseminated to relevant workers within the workplace in a timely and efficient manner.

5.4 Workers

- 5.4.1 It is the responsibility of workers, including contractors, to:
 - Report any identified WHS hazards in the workplace
 - Report all incidents and 'near-miss' occurrences as soon as reasonably practicable
 - Be involved, where appropriate, in the development, implementation and review of
 policies and procedures for hazard identification, risk assessment and control of
 hazards and risks within their workplace, and
 - Participate in WHS consultation and communication.

5.5 WHS and Injury Management Adviser

- 5.5.1 The ASC WHS and Injury Management Adviser is a corporate role responsible for:
 - Preparing materials to effectively communicate relevant WHS issues affecting ASC workplaces
 - Developing, implementing and reviewing the ASC's WHS related policies and procedures
 - Facilitating the quarterly meeting of the WorkSafe Committee to discuss WHS issues, evaluate reports submitted by HSRs and recommend corrective action, and
 - Ensuring WHS communications are disseminated to relevant ASC workers and other persons.

5.6 WorkSafe Committee

- 5.6.1 The WorkSafe Committee is the ASC's WHS Committee our peak forum for WHS consultation, cooperation and coordination. Broadly, its responsibilities are to:
 - Support and guide the development, implementation and review of WHS policies and procedures
 - Update prevention activities
 - Lead and support communication and cooperation between the ASC and its workforce
 - · Advise and assist employees on WHS matters, and
 - Support the development and dissemination of WHS information.
- 5.6.2 The WorkSafe Committee's terms of reference are available via the <u>ASC's Work Health and Safety</u> intranet page.

5.7 Work groups

- 5.7.1 The ASC has facilitated the determination of a number of work groups through negotiation and agreement with its workers. An overview of these <u>work groups (determined by location)</u> is available on the intranet.
- 5.7.2 A work group is a group of employees that perform similar jobs or have similar occupational health and safety concerns. There can be more than one work group at a workplace.
- 5.7.3 A work group can include:
 - employees of an employer at one or more workplaces, and
 - employees of multiple employers at one or more workplaces.
- 5.7.4 Work groups are required so that workers (as a group) can determine the most appropriate way for the PCBU to consult about WHS concerns or matters.

5.8 Health and Safety Representatives

- 5.8.1 HSRs are workers who are elected to represent the health and safety interests of their work groups.
- 5.8.2 HSRs are expected to:
 - Represent workers in their work group on WHS matters and in discussions with managers about hazards and safety issues
 - Monitor that the PCBU is meeting health and safety standards
 - Promote the health and safety of workers in their work group, and
 - Provide a communication link between people at work and the PCBU.
- 5.8.3 Following completion of HSR training, HSRs may also:
 - Initiate emergency stop-work procedures, and
 - Direct a work group member to stop unsafe work and issue a provisional improvement notice (PIN).
- 5.8.4 Further information about HSRs, including a list of ASC HSRs, is available via the ASC Corporate Citizens intranet page.

6.0 Consultation, co-operation and coordination explained

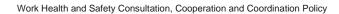
6.1 Consultation

- 6.1.1 The WHS Act requires the ASC, as a PCBU, to consult with all workers.
- 6.1.2 Specifically, s47(1) of the WHS Act provides that a Person Conducting a Business or Undertaking (PCBU) must, so far as is reasonably practicable, consult with workers who carry out work for the PCBU who are, or are likely to be, directly affected by a matter relating to WHS.
- 6.1.3 In the context of WHS, consultation refers to a two-way exchange of information between a PCBU and its workers. This exchange of information, as per s48 of the WHS Act, involves:
 - Sharing information about health and safety
 - Giving employees a reasonable opportunity to express their views
 - · Taking those views into account, and
 - Advising consulted workers of consultation outcomes in a timely manner.
- 6.1.4 The aim of consultation is to ensure that there is sufficient information provided to make well-informed decisions and that the workers who may be affected are given reasonable opportunity to provide their views and understand the reasons for decisions.
- 6.1.5 As per s48(2) of the WHS Act, if employees have elected HSRs, those HSRs must be consulted.
- 6.1.6 As per s49 of the WHS Act, the ASC must consult with workers on matters concerning health and safety when:
 - Identifying hazards and assessing risks to health and safety arising from the work carried out or to be carried out by the ASC
 - Making decisions about ways to eliminate or minimise those risks
 - Making decision about the adequacy of facilities for the welfare of workers
 - Proposing changes that may impact on the health and safety of workers, and
 - Making decisions about the procedures for:
 - Consulting with workers
 - Resolving work health and safety issues in the workplace

- Monitoring the health of workers
- Monitoring the conditions at any workplace under the management or control of the ASC
- o Providing information and training for workers, and
- When carrying our other activities prescribed by the regulations for the purpose of consultation.
- 6.1.7 The ASC will also consult with workers when:
 - Making decisions about health and wellbeing programs or initiatives that may be made available to ASC employees
 - · Conducting incident investigations into incidents or 'near misses', and
 - Developing or reviewing procedures for recalls of plant, equipment or other items used by the ASC.
- 6.1.8 There are a number of WHS groups and forums that can be leveraged for the purpose of consulting workers. These include the ASC's:
 - WorkSafe Committee
 - Work groups, and
 - HSRs.
- 6.1.9 Examples of less formalised avenues for consultation include:
 - Project briefings
 - Toolbox or pre-start meetings
 - · Team briefings, and
 - · Site inductions.
- 6.1.10 As a PCBU, the ASC must ensure that contractors (defined as workers under the WHS Act) are also included in WHS consultation processes. If the above avenues for consultation are not effective avenues for consultation with contractors, consideration must be given to alternative options.

6.2 Co-operation

- 6.2.1 The Work Health and Safety Consultation, Co-operation and Co-ordination Code of Practice, provides that cooperation is:
 - Working collaboratively with other duty holders to implement any agreements reached during consultation processes, and
 - Enacting health and safety obligations.
- 6.2.2 Working collaboratively can be defined as working together with a common purpose, joint authority and control, along with shared resources, risks and benefits.
- 6.2.3 If an ASC worker is approached by another duty holder(s) wanting to consult or cooperate on a WHS matter, that ASC worker must:
 - Not obstruct communication, and
 - Respond to that request (should it be reasonable) to assist the other duty holder(s) to meet their WHS duties.



6.3 Co-ordination

- 6.3.1 The Work Health and Safety Consultation, Co-operation and Co-ordination Code of Practice states that WHS duty holders should plan and coordinate their WHS activities with other duty holders. This includes:
 - Ensuring measures are put in place to work effectively together to control WHS risks
 - Identifying when and how each control measure is to be implemented, and
 - Ensuring all control measures compliment each other.
- 6.3.2 Examples of co-ordination include:
 - Scheduling work activities so each duty holder carries out their work separately or at an appropriate time, and
 - Arranging work in a way that will allow necessary precautions to be in place or preconditions met before particular work is done.
- 6.3.3 In relation to co-ordination, duty holders, depending on their level of WHS control, could include:
 - The PCBU
 - Designers,
 - Manufacturers,
 - Importers
 - Suppliers and installers of plant, substances or structures
 - · Officers, and
 - Workers.

7.0 Identifying other duty holders

- 7.1 The WHS Act requires each person with a health and safety duty to consult, co-operate and co-ordinate activities with each other person who has a duty over the same matter.
- 7.2 Those who may need to be involved in consultation, co-operation and coordination activities include:
 - Contractors who are involved in the same work at the same time in the same workplace, including contractors responsible for the installation of plant and equipment
 - Landlords or managing agents where there are activities impacting a shared workplace, for example, in relation to emergency plans and procedures, or where contractors may be undertaking maintenance or repair work
 - Landlords / management of multi-tenanted office buildings, and
 - Labour hire companies.

8.0 Shared consultation arrangements

- 8.1 The ASC has an obligation under s16 and s46 of the WHS Act to other duty holders to consult on WHS matters for which it has shared responsibility.
- 8.2 At s47(2), the WHS Act also provides that if more than one person has a duty in relation to the same matter, each person with the duty must, so far as is reasonably practicable, consult, co-operate and co-ordinate activities with all other persons who have a duty in relation to the same matter.

- 8.3 It is therefore necessary for an appropriate ASC representative to consult, communicate and coordinate activities with other duty holders to ensure:
 - Each party understands how their activities may impact on health and safety, and
 - The actions taken to control WHS risks and complementary and non-conflicting.
- 8.4 Each duty holder retains responsibility for their duty in relation to the activity and must discharge their duty to the extent they have the ability to influence and control WHS matters.

8.2 When is consultation required between duty holders?

- 8.2.1 If the answer to any of the following questions is yes, then it is likely that shared consultation arrangements will need to be established with other duty holders:
 - Does more than a single contributor influence or control the work?
 - Does more than a single contributor affect WHS in relation to the work?
 - Are there circumstances (when and where) the activities of multiple contributors interact?
 - In cases where there are multiple contributors, could any single contributor compromise or support the other contributors involved?
 - Do multiple contributors need to share information, documentation, mutual agreements or workplaces to enable the work to be carried out?

8.3 Identifying the type of shared consultation arrangements required

- 8.3.1 Useful questions to consider when determining what consultation arrangements need to be in place include:
 - To what extent does each contributor affect, influence and control the workplace itself and the tasks and activities carried out by their contributing workers?
 - What information does each contributor need to share with other parties?
 - What information does each contributor require from other parties?
 - How can it be demonstrated that consultation/communications occurred and could the involvement of the WorkSafe Committee assist in the development and coordination of the necessary arrangements?
 - How will the work be supervised to ensure compliance with agreements between contributing PCBUs?

9.0 Participating in effective communication

- 9.1 To help ensure effective communication with other duty holders and thus facilitate a good foundation for consultation, cooperation and coordination activities, ASC duty holders are expected to:
 - · Participate in team meetings
 - Seek WHS information
 - Consider using emails to clarify and provide a two-way communication approach
 - Establish an open and constructive approach to speaking with colleagues and managers
 - Consider the barriers to communication in remote and isolated work locations (e.g. shift work, working alone, isolated by distance or team support, working from home), and
 - Make contact daily where possible.

- 9.2 Contributors to ineffective communication we should all be monitoring for include:
 - · Lack of clarity of message
 - Absence of emotional resonance in message
 - Inaccurate targeting
 - Poor timing, and
 - No genuine feedback process.

10.0 WHS issue resolution

- 10.1.1 One of the objectives of the WHS Act is to provide for fair and effective WHS issue resolution.
- 10.1.2 A WHS issue is a concern about health and safety at the workplace that remains unresolved despite everyone's best efforts to consult, cooperate and coordinate. As an example, this might include a difference of opinion about the adequacy of a particular WHS risk control.
- 10.1.3 The ASC's agreed issue resolution procedure, which meets the requirements of the <u>WHS</u> Regulations and can be initiated by any party, comprises four phases:
 - Initial reporting
 - Initial resolution
 - Secondary resolution, and
 - Tertiary resolution.

10.1 Initial Reporting

- 10.1.1 All workplace hazards and incidents are to be reported, including those involving injury/illness, property damage or a situation with the potential to cause either of these.
- 10.1.2 In addition, all near-miss incidents should be reported. Where the issue is within the control of the worker e.g. wiping up a spill, or removing a minor passage blockage, they should take appropriate action.
- 10.1.3 The ASC's WHS Incident and Injury Report form is available on the intranet.
- 10.1.4 Alternatively, workers may access a copy of the WHS Incident and Injury Report via the Sport Australia website (www.sportaus.gov.au) or request a copy from site.security@ausport.gov.au, People and Culture (whs@ausport.gov.au) or their ASC HSR.
- 10.1.5 When complete, the WHS Incident and Injury Report form can be emailed to <a href="https://www.whs.ogen.com/whs.ogen

10.2 Initial resolution

- 10.2.1 Where the hazard cannot be fully resolved by straightforward individual action, the worker should raise any questions or concerns they may have about health and safety matters in their workplace with their manager/supervisor, HSR or the WHS and Injury Management Adviser.
- 10.2.2 It is preferable for health and safety issues to be resolved at the local level through consultation between the worker and relevant manager/supervisor where it is reasonably practicable to do so.

10.3 Secondary resolution

10.3.1 If discussions and related action/s do not lead to an acceptable outcome within a reasonable timeframe, options to pursue the issue include raising the matter with the next level of management and following that, People and Culture. Alternatively, a HSR may take the concern to the WorkSafe Committee for consideration and resolution.

10.4 Tertiary resolution

- 10.4.1 The process for resolving WHS issues is primarily centred on consultation and negotiation with management. If these avenues fail to resolve a health and safety issue in a reasonable time, the WHS Act provides for a number of formal actions.
- 10.4.2 In situations where a breach of the WHS Act or WHS Regulations has been identified, a HSR has the option of issuing a Provisional Improvement Notice (PIN) under s90 of the WHS Act.
- 10.4.3 A PIN is a written direction requiring the PCBU to remedy a breach, or potential breach, of the WHS Act or WHS Regulations.
- 10.4.4 A PIN can only be issued by an HSR who has completed accredited HSR training.
- 10.4.5 A PIN is a tool that is used as a last resort when all other methods of resolving the WHS issue have been unsuccessful.
- 10.4.6 Where a PIN has been issued, the relevant manager/team leader must advise the relevant General Manager as soon as possible. A joint decision will then be made on whether to comply with the PIN or dispute it.
- 10.4.7 If the issue remains unresolved after reasonable efforts have been made, a <u>Comcare Inspector</u> may be asked to assist with resolving the issue.

11.0 Documentation

- 11.1.1 All consultation, cooperation and coordination activities undertaken with workers and other WHS duty holders should be documented and saved somewhere central such as SharePoint to:
 - Demonstrate compliance with legislation
 - Assist with risk management processes, and
 - Lessen the likelihood of dispute.
- 11.1.2 Ideally, records will include outcomes of discussions in addition to the following points:
 - Who participated (names and roles)
 - What the safety matter is / was
 - What decisions were made (if any were made at all)
 - What action has been taken to date (by who and when), and
 - What actions are yet to be taken, by who and by when.
- 11.1.3 If a written agreement is prepared, all parties to the issue must be satisfied that the agreement reflects the resolution of the issue. A copy of the written agreement must be given to:
 - · All parties to the issue, and
 - If requested, to the WorkSafe Committee.

12.0 WHS policies, procedures and supporting instruments

- 12.1.1 All WHS policies, procedures and supporting instruments are reviewed and updated in the following circumstances:
 - In line with their revision dates set and monitored centrally by People and Culture
 - When there has been a change in the operations of the ASC
 - In the event of changes to legislation or WHS guidance material, and
 - When a new hazard or incident occurs and warrants a review (not previously factored into the applicable policy, procedure or related instrument).

12.1.2 In reviewing and updating these policies and procedures, consultation will occur with ASC workers in line with this Policy and the ASC's Policy Approval Framework.

13.0 References

ASC Code of Conduct

Codes of Practice

Comcare Regulatory Guide

SafeWork Australia

Work Health and Safety Act 2011

Work Health and Safety Regulations 2011



Work Health and Safety Consultation, Cooperation and Coordination Policy Version 3.0			
Policy Owner	People and Culture	Approved By	Alison Halpin Deputy General Manager People and Culture
Instrument Type	WHS Policy	Approval Date	September 2021
Updated By	Workplace Services	Review Date	September 2024
Consultation	WorkSafe Committee: October 2020 Business Partners: January 2021		
Update Description	Work Health and Safety Consultation, Cooperation and Coordination Policy Version 3.0 General review and update. Definitions and references to source documents added. Changes to structure and formatting. Addition of information regarding documentation requirements for consultation, cooperation and coordination. Addition of information regarding triggers for updates to WHS policies in the context of consultation, cooperation and coordination.		

Consultation Policy V2.0			
Policy Owner	Unknown	Approved By	WHS Governance Forum
Instrument Type	WHS Policy	Approval Date	2015
Update By	HR Adviser	Review Date	2017
Consultation	Unknown		
Update Description	Unknown		

Consultation Policy			
Policy Owner	Unknown	Approved By	Unknown
Instrument Type	WHS Policy	Approval Date	Unknown
Update By	HR Adviser	Review Date	Unknown
Consultation Unknown			
Update Description	Not applicable		

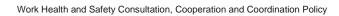
Appendix 1: Legislative references and definitions

Term	Abbreviation (if applicable)	Definition
Australian Sports Commission	ASC	For the purposes of this Policy, the Australian Sports Commission (ASC) covers Sport Australia and the Australian Institute of Sport (AIS).
Consultation	N/A	In the context of WHS, consultation refers to a two- way exchange of information between a person conducting a business or undertaking (PCBU) and its workers.
		A PCBU must consult, so far as is reasonably practicable, with workers who carry out work for the business or undertaking and who are (or are likely to be) directly affected by a health and safety matter.
		See s27 of the WHS Act.
		The ASC's consultation arrangements are set out in the Health and Safety Consultation, Coordination and Cooperation Policy and Working with Other Duty Holders Procedure.
Collaboration	N/A	A particular form of working together characterised by mutually developed common purpose, joint authority and control, along with shared resources, risks and benefits.
Contractor	N/A	A contractor is a worker, other than a worker employed directly by the ASC, who performs work for the ASC under a contract for the provision of goods or services. Contractors include subcontractors. Under the <i>Work Health and Safety Act 2011</i> (WHS Act), we must ensure the health and safety of all workers. This includes contractors while they are on our sites.
		See s28 & s29 of the WHS Act.
Health and Safety Representative	HSR	Health and Safety Representatives, commonly referred to as HSRs, are workers who are elected to represent the health and safety interests of their work group.
		See s68 of the WHS Act.
Officer	N/A	An officer is a person who has significant decision-making abilities and financial control over a PCBU or a substantial part of a PCBU.
		See s27 of the WHS Act.
Other duty holders	N/A	The WHS Act requires a PCBU to consult, cooperate and coordinate activities with all other persons who have a work health or safety duty in relation to the same matter, so far as is reasonably practicable. Duty holders' work activities may overlap and interact at particular times.
		See s47(2) of the WHS Act.
Other persons	N/A	An athlete, visitor or member of the public who is not carrying out work for the ASC but is within the ASC workplace or is affected by the work carried out by the ASC.

See s29 of th	WHS Act.
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		See 529 of the WHS Act.	
Person Conducting a Business or Undertaking	PCBU	The principal duty holder under the WHS Act is a 'person conducting a business or undertaking' which replaces the term 'employer' as principal duty holder. The ASC is considered to be a PCBU.	
		See s19 of the WHS Act.	
Policy	N/A	A statement of principle which outlines statutory, regulatory or organisational requirements in line with the strategic direction of ASC and the Australian Government.	
Policy and Procedure Register	PPR	A register of all policy and procedure framework-compliant documents which is located on the intranet.	
Procedure	N/A	Step-by-step instructions for operationalising particular policies (or similar) across the ASC or in a localised environment.	
Provisional improvement notice	PIN	A provisional improvement notice (PIN) tells the business or employer (or other PCBU) that a contravention to the WHS Act needs to be addressed as soon as possible. A qualified HSR can, in some circumstances, exercise powers if they believe there is, or has been, a contravention.	
		See s191 of the WHS Act.	
Reasonably practicable		Reasonably practicable is a legal requirement for employers under health and safety legislation and is a legal requirement. It means doing what you are reasonably able to do to ensure the health and safety of workers and others like volunteers and visitors.	
		See s18 of the WHS Act.	
Staff	N/A	Any person who carries out work (whether paid or unpaid) for the ASC. This includes:	
		 Employees 	
		 Trainees 	
		• Athletes	
		• Secondee	
		 Volunteers 	
		Work experience students	
		Contractors or sub-contractors	
		Employees of a contractor or sub-contractor	
		 Employees of a labour hire company assigned to work for the ASC 	
		See s29 of the WHS Act.	
Work Health and Safety	WHS	Work Health and Safety is the discipline concerned with protecting the health and safety of all stakeholders in the workplace from exposure to hazards and risks resulting from work activities.	
		See s3 of the WHS Act.	
Work Health and Safety Act 2011	WHS Act	An Act relating to work health and safety, and for related purposes. The main object of this Act is to provide for a balanced and nationally consistent	

		framework to secure the health and safety of workers and workplaces.
Work Health and Safety Codes of Practice	N/A	A practical guide on how to comply with the legal duties under the Work Health and Safety (WHS) Act and Regulations.
The Work Health and Safety Consultation, Co-operation and Co-ordination Code of Practice	N/A	Provides guidance to duty holders who share responsibility for the same work health and safety matter on how to consult, co-operate and co-ordinate activities with each other.
Work Health and Safety Regulations 2011		The Work Health and Safety Regulations 2011 (the WHS Regs) describe how to prevent or minimise a risk in the workplace.
Workplace		A place where work is carried out for a business or undertaking and includes any place where a worker goes, or is likely to be, while at work.
		See s8 of the WHS Act.
		ASC workplaces include, but are not limited to:
		 Offices, venues and facilities operated by the ASC in a State or Territory, and
		 Office spaces, facilities or premises owned and/or operated by an entity other than the ASC and leased by the ASC.
WorkSafe Committee		The purpose of the ASC's WorkSafe Committee is to provide a forum for management and workers together to identify and resolve health and safety problems, and to develop and monitor safe systems and procedures.





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