



## 4.4 WHS Review and Reporting

### 4.4.1 Aims and Objectives

To prescribe the responsibilities and actions required to regularly review WHS hazards and risks and reporting on the University's WHS Management System performance to meet the requirements as per the [Procedure: Work Health and Safety Reporting](#) and the [National Self Insurer WHS Audit Tool \(NAT CTH\)](#) as well as other relevant legislation and Work Health and Safety Management System (WHSMS) Handbook requirements.

#### 4.4.1.1 Objectives

To ensure the University and its Colleges, Schools Service Divisions and Portfolios:

- Regularly reviews its risk profiles to ensure the University operates at or below a medium residual risk environment; and
- Regularly monitors the WHS Management System implementation status and the Directors' progress in meeting their Due Diligence requirements prescribed under *WHS Act 2011 (Cth)*.

#### 4.4.1.2 Scope and Inclusion

This Chapter applies to workplaces and all workers of all Schools, Colleges and Service Divisions of the Australian National University (ANU), except where specified in 4.4.1.2.1.

##### 4.4.1.2.1 Application

In Portfolio Divisions, where the work involves only office-based work with no high-risk travel (e.g. FBS, P&C etc.), section 4.4.2.1 WHS Review – Annual Risk Profile Review does **NOT** apply considering the simple risk involved in their operations.

Section 4.4.2.2 applies to all College Deans, Schools and Service Divisions Directors, University House Master, Chief Operating Officer, Chief Financial Officer, Provost, Deputy Vice Chancellor (Academic), Deputy Vice Chancellor (Research & Innovation), , Pro Vice-Chancellor (Graduate Research), Pro Vice-Chancellor (Research Initiatives and Infrastructure), Pro Vice-Chancellor (Academic Quality), Pro Vice-Chancellor (Learning & , Teaching), Vice-President (First Nations) and Vice-President (Advancement).

## 4.4.2 Process

### 4.4.2.1 WHS Review – Annual Risk Profile Review

Responsible and Accountable Person	Actions Required
<b>Provost</b> <b>Pro Vice-Chancellor</b> <b>College Deans</b> <b>School Directors</b> <b>Division Directors</b> (See Exclusions in 4.4.1.2.1)  Seeking advice from and together with;  <b>WHS Officers/Managers</b>	<input type="checkbox"/> Conduct the <b>Annual Risk Profile Review</b> (Appendix A) in November/December each year by reviewing the School's latest Hazard Register and Static Risk Assessment Register.  The preparation work can be delegated to WHS Officers or equivalent. However, the responsible and accountable person must be briefed fully on what the review means.  <input type="checkbox"/> During this review, provide strategic and operational direction, financial or resource support to ensure higher control measures are implemented in areas under your control to reduce the residual risk of high or extreme activities, tasks, plant and equipment to medium or low.

<p><b>Or</b></p> <p><b>School Managers</b> or People &amp; Culture (P&amp;C) Managers if no WHS Officers or equivalent are appointed</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> These directions may form a part of the Local WHS Plan for the next calendar year which is updated annually once the University WHS Plan for the next calendar year is circulated.</li> </ul> <p><b>ONLY APPROVE THESE REVIEWS, ensure you fully understand the content and are satisfied with the residual risk ratings before approving; if unsure or not confident, contact Safety and Wellbeing for clarification before proceeding.</b></p> <p><b>Note:</b> The Annual Risk Profile Review must be submitted via Figtree.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> WHS Officers or equivalent - Assign any of the above directions as corrective actions in Figtree and monitor the completion as per Chapter 4.3 Corrective Actions.</li> <li><input type="checkbox"/> Provide a copy of your Annual Risk Profile Review to WHS Manager, Safety Systems and Audits on completion each year to include in University Council Report.</li> </ul>
<p><b>WHS Officers/Managers</b></p> <p><b>Or</b></p> <p><b>School Managers</b> or <b>General Managers</b> if no WHS Officers is appointed</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Monitor your School/Division's Static Risk Assessment Register monthly [See Chapter 3.1], if applicable and include this activity on your Local WHS Plan Part B – Plan for Schedulable Activities.</li> <li><input type="checkbox"/> Review your Local Hazard Register quarterly and ensure it is completed annually by the end of the calendar year, prior to the Annual Risk Profile Review.</li> <li><input type="checkbox"/> Once a month brief the Directors to satisfy them that the School or Division is operating in an environment that has either eliminated hazards or, where not possible, managed hazards so far as reasonably practicable.</li> </ul>
<p><b>Deputy Chief People Officer Safety &amp; Wellbeing (S&amp;W)</b></p> <p><b>And</b></p> <p><b>WHS Manager, Safety Systems and Audits</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Collate the Annual Risk Profile Review from School Directors and applicable Division Directors or their WHS Officers/equivalent in early January each year.</li> <li><input type="checkbox"/> Include the consolidated Annual Risk Profile Review outcome summary in the University Council WHS Performance Report (first report if the year).</li> </ul>
<p><b>University WHS Committee</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Quarterly review WHS Performance Report for University Council, especially noting any Schools/Divisions operating with a residual risk of high or extreme.</li> <li><input type="checkbox"/> Provide support, whether financial, resource or technical, to ensure these risks are reduced to medium or low.</li> <li><input type="checkbox"/> School/Division Directors to ensure their operation is within medium or low residual risk. If the School/Division is not making efforts to reduce the risks down so far as reasonably practicable, request the impacted Division provide quarterly reports to the University WHS Committee until the medium/low risk levels are achieved.</li> </ul>

#### 4.4.2.2 WHS Reporting

Responsible and Accountable Person	Actions Required
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<p><b>Provost</b> <b>Pro Vice-Chancellor</b> <b>College Deans</b> <b>School Directors</b> <b>Division Directors</b></p> <p><b>College General Manager (for College Admin)</b></p> <p>Seeking advice from and/or together with</p> <p><b>WHS Officers/Managers</b></p> <p>Or</p> <p><b>School Managers or P&amp;C Managers</b> if no WHS Officer is appointed</p> <p>Or</p> <p><b>Any other positions delegated by these accountable persons</b></p>	<p>Complete Due Diligence Report (Appendix B) via Figtree at the end of each quarter to be submitted within 14 days of the next quarter commencing.</p> <ul style="list-style-type: none"> <li>&gt; <b>Due Diligence Report</b> – Designed to assist meet the business area’s due diligence requirements under <i>WHS Act 2011 (Cth)</i>.</li> </ul> <p><input type="checkbox"/> Request WHS Officers/Managers or School Managers/P&amp;C Managers (if no WHS Officer is appointed) in your area to prepare the draft of these reports.</p> <p>It is important to be fully briefed on the details reported and to understand the evidence behind what is reported.</p> <p><b>ONLY approve the report in Figtree if you understand the content and you are satisfied with the explanation and/or evidence.</b></p> <p><b>See:</b> Information Sheet on how to submit and review reports in Figtree.</p> <p><input type="checkbox"/> Submit this report to the WHS Manager, Safety Systems and Audits, at the end of each quarter, ensuring it is submitted within 14 days of the start of the following quarter.</p> <p><input type="checkbox"/> <b>For any gaps identified in the Due Diligence report, ensure the WHS Officer assigns corrective actions to:</b></p> <ul style="list-style-type: none"> <li>➤ Have the gaps or matters corrected before the next reporting period for Due Diligence Report;</li> <li>➤ Request that monthly updates are provided on the progress of these actions.</li> </ul>
<p><b>WHS Officers/Managers</b></p> <p>Or</p> <p><b>School Managers or P&amp;C Managers</b> if no WHS Officer or equivalent is appointed</p>	<p><input type="checkbox"/> Prepare all necessary evidence to support Directors in completing the Due Diligence Report at the end of each quarter, and draft the report, ensuring you clearly explain the content, address any identified gaps, and provide supporting evidence for the information included.</p> <p><input type="checkbox"/> Ensure you accurately and diligently advise the Directors of the situation in their areas of control.</p> <p><b>Providing deliberately misleading information or evidence in these reports may be treated as a WHS issue, and you will be required to follow the WHS Issue Resolution Process outlined in Chapter 3.17 Raising and Resolving WHS Issues and Management of Complaints.</b></p>
<p><b>WHS Manager, Safety Systems and Audits</b> as the University WHS Committee Secretariat</p>	<p><input type="checkbox"/> Collate the Due Diligence Reports from School/Service Division Directors at the end of each quarter prior to the University WHS Committee meetings.</p> <p><input type="checkbox"/> Provide the collated reports to University WHS Committee Chairs.</p>
<p><b>Deputy Chief People Officer, Safety and Wellbeing(S&amp;W)</b></p> <p><b>And</b></p>	<p><b>Due Diligence Report</b></p> <p><input type="checkbox"/> Provide a quarterly matrix showing the submission status of Due Diligence Reports from all business areas across the University, and analyse the reports to highlight any key positives or negatives that need to be brought to the attention of the University WHS Committee or University Council and include them:</p>

<p><b>WHS Manager, Safety Systems and Audits</b></p>	<ul style="list-style-type: none"> <li>➤ As an Agenda Item for Local Area Report in University WHS Committee; and</li> <li>➤ In University Council WHS Performance Reports.</li> </ul>
<p><b>Deputy Chief People Officer, Safety and Wellbeing(S&amp;W)</b></p> <p><b>And</b></p> <p><b>WHS Manager, Safety Systems and Audits</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Prepare University Council WHS Performance Report six times a year (every two months) and a section report in the University Annual Report.</li> <li><input type="checkbox"/> Prepare the <a href="#">Safety Rehabilitation and Claims Commission Licensee Compliance and Performance Improvement Report</a> in February each year.</li> <li><input type="checkbox"/> Prepare any other WHS reports (both internal and external) that the University is required to provide.</li> </ul>
<p><b>University WHS Committee (UWHSC)</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Review and discuss any key positive and negative aspects reported by local School/Service Division Directors in the Due Diligence Report papers on University WHSMS implementation.</li> <li><input type="checkbox"/> Provide strategic or operational direction should a specific Director NOT be meeting their Due Diligence and may lead the University to NOT meeting its 'reasonably practicable' requirements under the <i>WHS Act 2011 (Cth)</i>.</li> <li><input type="checkbox"/> Provide strategic or operational directions should a School/Division not be progressing satisfactorily in implementing University WHSMS using the Handbook guidance that may lead to non-compliance to Self-insurance licence conditions.</li> <li><input type="checkbox"/> Assign corrective actions to these Directors should significant problems have been identified and discussed, and request Division report back to the next meeting.</li> </ul>
<p><b>COO</b></p>	<p><b>In addition to actions required as a member of the UWHSC</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Intervene early should a Director NOT be meeting their Due Diligence, which could: <ul style="list-style-type: none"> <li>➤ Prevent the Senior Leadership Group from fulfilling their Due Diligence obligations; and/or</li> <li>➤ Cause the University to fail in meeting its 'reasonably practicable' requirements under the <i>WHS Act 2011 (Cth)</i>.</li> </ul> </li> <li><input type="checkbox"/> Intervene early if a School/Division is NOT effectively implementing University WHSMS as outlined in the Handbook guidance.</li> <li><input type="checkbox"/> Discuss the serious nature and implications with the School Directors if any of the above issues arise.</li> <li><input type="checkbox"/> Provide positive recognition to Directors who exceed Due Diligence requirements.</li> <li><input type="checkbox"/> Acknowledge Schools/Divisions that excel in implementing the University WHSMS.</li> </ul> <p><i>Recognition can be delivered through University WHS Committee, verbal praise, public forums, the Vice-Chancellor's blog, or other appropriate channels.</i></p>
<p><b>Portfolio WHS Committee Chair (Service Divisions, Colleges and Schools)</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Discuss the submitted Due Diligence Report from Schools/Divisions under your control:</li> </ul>

	<ul style="list-style-type: none"> <li>➤ In Local WHS Committees; or</li> <li>➤ Where there are no College level/Divisional WHS Committees, College Deans/Directors review and discuss them in College Executive Meetings on a regular basis.</li> </ul> <p>This report is designed to assist leadership meet their Due Diligence requirements under the <i>WHS Act 2011 (Cth)</i>.</p>
<p><b>College Deans</b> <b>Provost</b> <b>Pro Vice-Chancellor</b> <b>College Deans</b> <b>School Directors</b> <b>Division Directors</b></p>	<p>S&amp;W can assist in providing further information on the meaning of these reports if needed on <a href="mailto:whs@anu.edu.au">whs@anu.edu.au</a>.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Provide positive recognition for College/School/Division Directors who are leading the implementation of University WHS Management System (WHSMS) under your control and making efforts to meet their Due Diligence [See definition].</li> <li><input type="checkbox"/> Provide strategic direction and support for College/School/Division Managers to assist in the implementation of University WHSMS and meet the Due Diligence report requirements [See definition].</li> <li><input type="checkbox"/> Intervene early should any College/Schools/Divisions NOT be implementing the University WHSMS under the Handbook guidance.</li> </ul>
<p><u><a href="#">Audit &amp; Risk Management Committee</a></u></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Review the WHS Performance Report for the University Council every two months.</li> <li><input type="checkbox"/> During the review, pay special attention to any breaches of due diligence by College/School/Division Directors or any unsatisfactory progress in implementing the University WHS Management System. <ul style="list-style-type: none"> <li>➤ Instruct the relevant Directors to improve their due diligence efforts to ensure the University meets its legal obligations.</li> <li>➤ Instruct the relevant Directors to enhance the implementation of the University WHS Management System to ensure compliance with the Self-Insurance licence conditions.</li> </ul> </li> </ul>
<p><b>University Council</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Review WHS Performance Report for University Council every two months.</li> <li><input type="checkbox"/> During the review, especially note any breach of due diligence by Directors (College/Division/School) or any unsatisfactory progress in implementing University WHS Management System.</li> <li><input type="checkbox"/> Take actions should any of the reported items that may: <ul style="list-style-type: none"> <li>➤ Potentially affect you in meeting your personal Due Diligence requirements under the <i>WHS Act 2011 (Cth)</i>; or</li> <li>➤ Potentially lead the University to non-compliance in either its legislated obligations or the self-insurance license conditions due to not implementing University WHS Management System.</li> </ul> </li> </ul>

### 4.4.3 Record Management

Record needed	Where to Archive	Frequency to Archive	How long to keep
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Annual Risk Profile Review	ERMS-ANU-Human Resources-WHS-Element 4-4.4  Completed by S&W.	Annually	No expiry
Due Diligence Report	Figtree	Quarterly	10 years
University Council WHS Performance Report	ERMS-ANU-Human Resources-WHS-Element 4-4.4  Completed by S&W.	Every 2 months	10 years
Corrective actions arising from the reports	Figtree	As assigned	10 years after the completion of the action

## 4.4.4 Definitions

**Due Diligence** as prescribed under the *WHS Act 2011 (Cth)*, requires officers of a person conducting a business or undertaking (PCBU), such as the University, to take necessary actions to ensure the PCBU complies with its WHS duties and obligations. This involves actively exercising their responsibilities to maintain compliance with health and safety laws.

Due Diligence in the context of the University involves taking reasonable steps to:

- Acquire and maintain up-to-date knowledge of work health and safety matters.
- Understand the nature of the University's operations as a PCBU (person conducting a business or undertaking), including the associated hazards and risks.
- Ensure that the University and all areas under its control have, and use, appropriate resources and processes to eliminate or minimise health and safety risks arising from work activities.
- Ensure that the University has effective processes for receiving, considering, and responding promptly to information about incidents, hazards, and risks.
- Ensure that the University complies with its duties and obligations under the *WHS Act 2011 (Cth)*.
- Verify the implementation and effectiveness of the resources and processes mentioned above.

**Local areas** mean Schools, Colleges and Divisions and Portfolios of the University.

## 4.4.5 Performance Measures

The University will use the performance measures listed below to assist in identifying areas of success and/or where corrective action is required to meet the objectives and targets of this process.

The level of compliance with the chapter and effectiveness will be determined during the internal audit process which will in turn determine the compliance with WHSMS. Local areas can use below as a guide to improve compliance.

References	Performance Measures	Objective Evidence	Frequency	Indication of Success
4.4.1.1a)	Annual Risk Profile Review has been conducted for the previous year	Signed Annual Risk Profile Review	Annually	Yes = Success  Otherwise, corrective actions
4.4.1.1 b)	Due Diligence Report has been submitted quarterly	Submitted Due Diligence Report  Corrective actions	Quarterly	Yes = Success  Otherwise, corrective actions

## 4.4.6 Useful Resources and Links

<b>Traffic Light Status Report</b>	<p>The Traffic Light Status Report is a tool used to measure the implementation of the WHSMS Handbook in the local area. It is a non-mandatory report but is recommended to be run at least annually to provide an indication of where additional resources or support may be required.</p> <p>Report Template available under “Related Links” of Chapter 4.4 <a href="#">Review and Reporting</a></p>
<b>University documents</b>	<p><b>WHSMS Documents</b></p> <ul style="list-style-type: none"> <li>➤ <a href="#">Procedure: Work Health and Safety Reporting</a></li> </ul> <p><b>Other relevant WHSMS Handbook Chapters</b></p> <ul style="list-style-type: none"> <li>➤ All Chapters</li> </ul>
<b>NAT Tool Reference</b>	<p><a href="#">National Self Insurer WHS Audit Tool (NAT CTH)</a></p> <p>Standards 2.3.2, 3.2.3, 3.6.1, 3.6.3, 3.6.4, 3.6.5, 3.6.6</p>
<b>Legislation</b>	<p><a href="#">Work Health and Safety Act 2011 (Cth)</a></p> <p><a href="#">Work Health and Safety Regulations 2011 (Cth)</a></p>
<b>Information Sheet</b>	Use Figtree to submit operational reports