

## WORKPLACE HEALTH AND SAFETY POLICY

ORGANISATION:	Kokoda Track Foundation
ACN:	103 660 948
POLICY TITLE:	Workplace Health and Safety
VERSION:	3.0
STATUS:	FINAL
ALLIED POLICIES:	Code of Conduct COVID-19 Policy & Procedures In-Country Safety and Security Policy HIV & Aids Policy Child Protection Policy Prevention of Sexual Exploitation, Abuse & Harassment Policy
OWNER:	CEO
APPROVED BY:	Finance, Audit & Risk Management Committee
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### INTRODUCTION:

KTF is committed to safeguarding the health, safety and welfare of all people who interact with the organisation and complying with its occupational health and safety obligations.

It is essential that all KTF personnel are aware of the health and safety risks, both in KTF head office and branch office, and in travelling to rural and remote regions across Papua New Guinea (including travel via on route cities and Provincial towns) and that this Workplace Health and Safety is strictly adhered to in order to mitigate these risks.

### PURPOSE:

KTF recognises that workplace health and safety is integral to achieving excellence in project management, project delivery, team collaboration, and work performance outcomes. The purpose of this policy is to, as far as reasonably practicable:

- prevent workplace injuries and illnesses
- promote a safe and healthy workplace culture
- inform all KTF personnel (which includes Directors, Staff, Representatives and Volunteers), of the country / region-specific security guidelines and procedures that apply in Papua New Guinea (PNG).
- provide a framework for consulting, collaborating and communicating with workers and health and safety representatives
- consider workplace health and safety in project planning and work activities
- allocate adequate resources to prevent health and safety risks and promote a safe and healthy workplace
- ensure that workers understand their rights and responsibilities, and can identify and control risks in the workplace
- drive continuous improvement in workplace health and safety.

This policy provides emergency contact details and telephone numbers (Appendix A) and suggested 'Safe Houses' (Appendix B). The policy will be used to assist KTF personnel to reduce the likelihood of adverse incidents taking place and if they do happen, by responding appropriately and minimizing their impact.

While all workplaces carry inherent health and safety risks, KTF acknowledges that working in certain areas in PNG comes with higher degree of risks towards staff and programs. Although KTF will do its utmost to minimise those risks, a certain level of risk will remain while implementing our mission. KTF will strive to ensure that staff is aware of the risks that involve their work.

Rather than seeing safety management as a restrictive necessity, KTF sees safety management as a way of enabling our work and programs and thus the continuation of operations under conditions where without safety management this might no longer be possible.

As a result of the aforementioned considerations, KTF considers health and safety management as a way to:

- Reduce workplace health and safety hazard
- Safeguard workers' health and safety
- Enable operational activities under difficult security conditions
- Reduce the risk to individual staff members to an acceptable level
- Protect KTF property and reputation

The balance between these objectives is carefully decided upon at every level in the organisation and this document will provide clarity on which decisions are made at which level. Also, it gives every staff member; regardless of his/her function the right and duty to contribute to these objectives.

This Workplace Health and Safety Policy is the main tool in the implementation of health and safety management within KTF and it strives to do so by:

- Providing clear decision lines and responsibility levels
- Give guidance in certain specific situations
- Ensure adequate awareness and preparation on all levels within the organisation

#### DEFINITIONS:

In this policy, 'workplace' means places where people work in connection with KTF whether on-site or off-site, including work-related conferences, functions, client events, retreats and social events.

'Occupational violence' refers to any incident where a person is physically attacked, abused, assaulted or threatened in the workplace.

#### SCOPE:

Primarily and up to a certain extent, KTF bears responsibility for the health and safety of their staff as a matter of duty of care in the execution of the day-to-day activities. This includes consultants and the specific arrangements for consultants are laid down in the contractual agreement.

However, it is not uncommon that KTF staff are joined by others, such as, but not limited to, journalists, politicians, donors, volunteers and fundraisers. The behaviour of these others might affect the health and safety of KTF staff. Also, KTF feels the moral obligation to provide the same health and safety measures for persons that assist KTF with our mission as we do for our staff.

In order to ensure compliance to the KTF safety measures a person who does not have a contractual agreement with KTF will have to sign a code of conduct. The code of conduct states that KTF will do its utmost to ensure the health and safety of the person as long as he or she complies with the stipulations in this Workplace Health and Safety Policy and all related documents or decisions. The signing of this code does not extend KTF's liability towards this person in case of an incident.

For family members, wanting to accompany a staff member on a field trip, this is only possible after approval from the CEO and the before mentioned code of conduct will have to be signed.

Therefore this Workplace Health and Safety Policy applies to all KTF employees, headquarters, expatriate and national staff, directors, officers, contractors (including employees of contractors), suppliers, consultants on short- or long-term missions, family members duly authorised to accompany or visit staff during missions, authorised visitors, volunteers in the field and interns and any other person working formally and directly with KTF.

This Workplace Health and Safety Policy does not concern itself with the health and safety of our partner organisations. This is not because KTF does not see the importance of good safety management within the partner organisations but because it should have its rightful place in other documents.

In case of a duty trip, working time will usually be considered to be beyond the actual working hours and it is difficult to distinguish between activities with or without business objectives. This Workplace Health and Safety Policy therefore applies 24/7 and staff is expected to comply throughout the duty trip.

Towards employees who are, by their own choice, in an area where they were not sent by KTF, irrespective whether or not KTF is active in that area, KTF will not take responsibility. In case an employee wants to combine a holiday with a duty trip,

then a clear moment in time needs to be agreed upon that separates the holiday from the duty trip.

#### COMMITMENT TO WORKPLACE HEALTH AND SAFETY:

KTF aims to safeguard the rights of all people to work in an environment that is safe and does not pose risks to health.

KTF is committed to working in partnership with all workers to identify and address workplace health and safety issues. It encourages the formation of work groups and the appointment of health and safety representatives to represent employees on health and safety matters.

KTF is committed to continuously improving its workplace health and safety practices through the ongoing development of systems and processes to:

- identify, assess and control workplace hazards
- reduce the incidence and cost of occupational injury and illness
- provide a rehabilitation system for those affected by occupational injury or illness.

KTF is committed to ensuring all workers are free from bullying and occupational violence in the workplace.

#### COMPLIANCE:

KTF takes its health and safety obligations seriously.

One of the critical success factors for this Workplace Health and Safety Policy is the acceptance and compliance by staff and all other persons involved. Compliance is not optional; it is compulsory and concurrent with the start of any kind of work with KTF. The Policy is therefore binding on all persons it addresses. However, in some unforeseen situations staff might be unable to comply with the stipulations or compliance, leading to even greater direct risks. In those cases, consultation with the CEO is sought beforehand and a clear explanation is submitted afterwards.

Any unreasonable breach of stipulations in this Policy or related documents and decisions shall be considered a disciplinary offence and will be subjected to disciplinary action within the organisation such as (but not limited to) counselling, suspension, dismissal, or cessation of the person's engagement with KTF.

#### PRINCIPLES:

The following principles are the guiding principles for health and safety management within KTF. Any exception to these principles may only be authorised by the Board of Directors.

##### PRIMACY OF LIFE AND THE INDIVIDUAL RIGHT TO WITHDRAW

For KTF, life proceeds over material and therefore no staff should endanger their own life, or the lives of others, whilst attempting to protect KTF property, equipment, financial resources, documents or infrastructure.

Staff are always beforehand informed of and prepared for the level of risk of any given mission and by accepting the mission they accept the risk. However, unforeseen circumstances or developments may occur and therefore every individual staff member has the right to request to suspend activities, withdraw and/or leave the area.

Such requests will be granted where this suspension or withdrawal does not expose the individual or team to greater risk. This will be assessed by the CEO. If the CEO considers that this individual decision exposes a greater risk to the individual or team, then the individual still has the right to suspend or withdraw, but at his/her own risk and costs.

##### PRINCIPLE OF PRECAUTION

Within the line-management structure there is a co-responsibility between an individual or manager and the next higher manager. They try to communicate and discuss certain issues and aim for consensus. If this communication is not possible or there is a difference of opinion and immediate action is required then the principle of precaution overcomes.

This means that the decision to evacuate, withdraw or prohibition of a field trip will be endorsed, independent of which level initiates the decision. Both levels can make decisions on evacuation or withdrawal or the prohibition of specific trips and nobody can overrule these decisions.

KTF at all times, withholds the right to withdraw an employee or a group of employees from an area or country.

## ACCEPTANCE AS MUCH AS POSSIBLE, PROTECTION WHEN NEEDED

Due to the fact that KTF can find itself operating in complex situations involving significant risks for staff and programs, KTF needs to formulate a clear strategy on how to mitigate the risks for every specific situation and how to position itself in these complex situations.

The basis of our health and safety management in all situations will be the acceptance by the local community. We will make all reasonable efforts to negotiate and gain acceptance from relevant local actors. Acceptance by the community is one of the preconditions to operate and we will actively contribute to that, through communication, participation, relationships and through our programs. Our behaviour is with respect for local cultures and existing economic, religious and political patterns and will be steered by the Code of Conduct.

The protection approach to safety focuses on reducing staff vulnerability to risks by implementing procedures and using equipment to secure themselves against the risks. Key elements are clear and agreed policies and procedures, staff awareness on risks and vulnerabilities, communication procedures and equipment, protection devices and so forth.

The default balance between the mentioned approaches is to achieve acceptance as much as possible, complemented with protective measures when needed. Ideally, the protective measures do not inhibit or contradict our acceptance approach.

## DETERRENCE AS A LAST RESORT

In the reality of nowadays working environments, where the context and sometimes even the configuration of aid are politicized, acceptance or even protection is not enough. In those cases, one last resort might be the deterrence approach, most clearly defined as posing a counter-threat in legal, economic, or political terms.

One of the most viable examples might be the threat of suspending activities or withdrawal from the area.

Another example is the use of any form of armed guards, protection or escorts. Since the latter example seriously undermines our acceptance approach and the perception of our independence and impartiality, this option is an exception which can only be made after approval by the CEO or temporarily during immediate evacuation.

KTF will not accept the integration of military personnel on humanitarian mission into KTF missions, nor the transportation of military personnel (armed or unarmed) in KTF vehicles.

## DO NO HARM

One of the biggest factors influencing the success of our acceptance approach is the 'Do no harm Principle'. KTF will not undertake any missions or field visits that jeopardize the health and safety of partner organisations or the local community.

KTF will not send consultants or others to areas where they are not willing to send employees unless KTF can make it absolutely clear that these consultants or others are less at risk than KTF employees.

## THRESHOLD OF RISK

The impact of our activities that can be achieved should always outweigh the risks taken. In principle, KTF will suspend its operations where the health and safety risks are disproportionate to the potential program benefits. Therefore, KTF commits itself to continuously analyse and understand the context and the risks that result from working in that context.

Acceptance by the local community is one of the preconditions to operate. KTF is not willing to operate in areas where it is clear that employees of international organisations are explicit targets of attacks. Also, when there are known and specific threats towards KTF staff in certain areas and this threat is considered as credible, or in circumstances where the level of generalised violence suggests a high probability of an incident harming KTF staff, then the principle of precaution indicates that KTF will not allow staff to work in or travel to this area.

KTF commits itself to minimising the risk to staff and therefore will always explore all possible alternatives to attain the aims of the operations.

The above developments and considerations have to be monitored by and decided on by the CEO.

## LINE MANAGEMENT, DECISION MAKING AND RESPONSIBILITIES

KTF believes that a clear division in responsibilities, communication between staff as well as checks on the application of measures are key factors in managing security in the best possible way. For that, KTF considers the line-management structure as the primary system for workplace health and safety management. Safety is an integral part of field operations and only managers are in the position to balance between the impact of the activities and the risks taken. Additionally, KTF has some management tools and task forces at institutional level to support this line-management responsibility.

In the event of the absence of key players, the responsibility is transferred to a colleague at the same level or one's own manager, and this is communicated, beforehand and effectively. Decisions made by higher levels should be adhered to with due consideration of each individual's personal responsibility.

### PERSONAL RESPONSIBILITY

Staff is the organisation's most valuable asset. KTF employees have made a conscious decision to work with the organisation and are committed to its mission. While this attitude is crucial for boosting staff motivation and performance, it needs to be balanced against health and safety risks on the ground. Each employee is expected to understand, weigh, and ultimately, accept these risks. (Also, see Primacy of life and the individual right to withdraw)

An open and proactive attitude is a prerequisite for implementing a successful safety policy. Each staff member must realise that his/her conduct will have an impact on KTF's image, whether positive or negative, and thus on the safety status of the mission. This includes, but is not limited to, the adherence to the Code of Conduct.

For the workplace health and safety management structure to work it is important that the strict operational hierarchy is respected at all times. This requires an open and inclusive working environment in which all staff members contribute to improved security by taking an active role in security issues.

This means that the personal responsibilities include (but are not limited to) the following responsibilities:

- Demonstrate a commitment to providing and maintaining a safe and healthy workplace
- Participate in workplace health and safety training, actions and activities and support KTF in its efforts to achieve its workplace health and safety and, where relevant, rehabilitation objectives
- Follow lawful and reasonable workplace health and safety instructions from managers or supervisors
- Prepare for going to or staying in certain areas. This includes the understanding of the context and the risks involved, demanding security briefing in HQ and knowledge of and compliance to organisational policies.
- Everyone is responsible for his/her own health. KTF offers the possibility for proper health advice, vaccinations and prophylaxis, first aid kits and other measures and the employee is expected to act accordingly. Every employee is expected to maintain a certain level of hygiene and avoidance of infection such as irresponsible sexual conduct.
- Everyone is expected to actively contribute to improved security management practices of the organisation. This includes incident reporting, making suggestions for improvement and point out to colleagues when certain behaviour is not in line with the policy.
- Staff members are expected to share their detailed travel planning with all relevant stakeholders
- Work in a way that does not endanger the health or safety of themselves or others
- Properly use and maintain safety equipment
- Make sure visitors follow safety rules in the workplace.

### CONTRACTORS OF, VISITORS TO AND VOLUNTEERS OF KTF

- demonstrate a commitment to providing and maintaining a safe and healthy workplace
- follow lawful and reasonable workplace health and safety instructions from KTF
- report any serious incidents, accidents, injuries or hazards in the workplace to KTF
- assess risks to their health and safety arising from the provision of KTF
- have control measures in place to address those risks, including complying with any relevant policies and practices.

### SUPERVISORS/MANAGERS

- demonstrate a commitment to providing and maintaining a safe and healthy workplace
- review relevant workplace health and safety legislation to determine whether a Workplace Health and Safety

Committee is required for the workplace and/or at any particular site

- consult with workers about, and participate in, KTF's workplace health and safety program
- use risk identification, assessment and control principles to achieve KTF's workplace health and safety objectives
- provide information and training to workers on relevant policies, procedures and workplace health and safety obligations.

## COO

The COO is responsible for coordinating management of health and safety on behalf of the CEO:

- demonstrate a commitment to providing and maintaining a safe and healthy workplace
- ensure that all staff receive appropriate information and training on the policy and related procedures, and on their obligations under occupational health and safety laws.
- represent employees from their work group in relation to workplace health and safety matters
- investigate health- and safety-related complaints before making representations to management
- make representations to management and report back to employees on any matter relating to workplace health and safety
- discuss with the employees any proposals or matters which may affect the health and safety of employees
- assist management in identifying hazards, assessing risks and implementing risk control measures
- assist in promoting adherence to health and safety policies and procedures
- assist in the monitoring of risk controls and health and safety policies and procedures.

## CEO

The CEO has overall responsible for all KTF personnel:

- demonstrate a commitment to providing and maintaining a safe and healthy workplace
- consult with workers about, and participate in, KTF's workplace health and safety program
- use risk identification, assessment and control principles to reach KTF's health and safety objectives
- ensure that all workers receive appropriate information on the policy and training related procedures, and on their obligations under occupational health and safety laws.
- The CEO is responsible for approving and maintaining security planning and/or for adequate and functional alignment with KTF partners with regards to security management agreements.
- The CEO ensures every staff member is adequately trained and prepared for his/her work.
- The CEO decides on the withdrawal or evacuation of staff members, individually or collectively, voluntary or forced.

## BOARD OF DIRECTORS

The Board of Directors has overall responsible for the health and safety of all KTF personnel and thus the obligation to actively contribute to and formulate the KTF health and safety policy and its implementation:

- demonstrate a commitment to providing and maintaining a safe and healthy workplace
- lead a discussion and process of articulating the principles of KTF on current and foreseeable security issues.
- decide on armed guards or armed escorts.
- take security into account when deciding on starting operations or field presence in an area by means of a thorough assessment process.

## RISK ASSESSMENT:

The purpose of this Risk Assessment is to identify health and safety risks to KTF personnel in PNG.

### CIVIL UNREST AND POLITICAL TENSION

Local tensions and ethnic disputes occasionally lead to outbreaks of fighting and flare up around the country from time to time. These are most common in the highlands region and often involve the use of firearms, rioting and looting. Outbreaks of violence also occur in settlements and marketplaces in Port Moresby, Popondetta, Lae, Goroka, Kainantu, Mt Hagen and towns in the Highlands.

The Royal Papua New Guinea Constabulary (RPNGC) faces a number of obstacles, including limited resources, and this may affect police response times in the event of crime.

Tension between ethnic groups can result in the widespread destruction of property, disruption of normal services and serious injury. National elections and recent political turmoil may also have the potential to fuel civil unrest and demonstrations leading to potentially violent confrontations with security forces. Opportunistic violence and crime throughout Papua New Guinea may occur during the period surrounding the elections. Rallies, demonstrations and other large public gatherings may turn violent.

#### CRIMINAL ACTIVITY

Crime is particularly prevalent in urban areas such as Port Moresby, Popondetta, Lae and Mt Hagen, and is generally considered to be highly opportunistic and random. Settlement areas on the outskirts of towns and cities are particularly dangerous and where many criminals live. 'Bush knives' (machetes) and firearms are often used in assaults and thefts. Bag snatching, robberies (personal residences and businesses) assaults (including sexual assaults), and carjacking are common. Banks and automatic teller machines are regularly targeted. The crime rate tends to increase leading into the Christmas holiday period.

Walking after dark is particularly dangerous in Port Moresby, Popondetta and other urban centres. All travel at night should be limited, but if required must be made by car, with doors locked, windows up, and radio security installed.

Opportunistic crime is by far the most prevalent in PNG, however there have also been incidents of robbery in which expatriates have been targeted in their homes or workplaces and also small numbers of high profile kidnappings for ransom. Most areas in Port Moresby are very high risk for carjacking and robbery, however the areas near Parliament House in Waigani on weekends and the roads near the airport and Airways Hotel have a higher risk.

There is a high incidence of sexual assault and rape committed against women and girls. Due to the high prevalence of HIV/AIDS, victims of violent crime, especially rape, are strongly encouraged to seek immediate medical assistance.

#### NATURAL DISASTERS

Regular volcanic eruptions do occur as PNG is in a regular seismic zone. Areas where these happen most often are around Rabaul, Bougainville, West New Britain and Manam Islands. Some coastal areas are in tsunami zones. Some areas are prone to flooding and landslides, particularly in the highlands where there is very high rainfall. Oro Province, in particular the Northern Beaches region (Sanananda, Buna and Gona) are prone to flooding and occasional cyclones.

#### HEALTH RISKS

In Papua New Guinea there have been recent instances of widespread disease outbreak and epidemics (including cholera in Port Moresby). KTF personnel need to be aware that illness can quickly escalate and access to quality medical treatment is limited. KTF personnel must be diligent about basic hygiene and monitor any change to their general personal health.

#### COVID-19

COVID-19 presents another challenge for KTF to manage during and emerging from the pandemic. COVID-19 is present in PNG and community transmission have been detected in the National Capital District and out in the Provinces. KTF receives regular advice from the State of Emergency Controller, the National Control Center for COVID-19, and KTF's Security Advisors (Guard Dog Security) as well corporate and NGO partners in-country. KTF must adhere to regular advice issued by the World Health Organisation, St John's Ambulance PNG, and the PNG Department of Health.

Likewise, COVID-19 is prevalent in Australia where KTF's head office is located and where staff are working from the office and remotely from home during the pandemic. KTF is to adhere to regular advice from National and State authorities and to follow lock-down orders, social distancing and health and hygiene measures at all times.

#### IN COUNTRY HEALTH AND SAFETY POLICIES:

All personnel are to be familiar with and adhere to KTF's allied In-Country Safety and Security Policy and COVID-19 Policy and Procedures.

## IN-COUNTRY EVACUATION & TRAVEL INSURANCE:

If an evacuation is required, due to medical or other circumstances, KTF personnel are to contact their KTF Emergency Contact immediately. The KTF Emergency Contact will make all logistical arrangements to evacuate the personnel and provide them with the appropriate medical support.

All KTF personnel must have appropriate travel insurance (including medical evacuation) in place before departing.

## EMERGENCY EVACUATION

Fires, bomb threats, gas leaks etc are risks in all workplaces. KTF will provide workers with information on emergency evacuation procedures at all its office and College locations.

It is imperative that all workers are aware of the procedures to follow in the event that evacuation is required.

## REPORTING

If a worker identifies:

- a workplace health or safety incident, accident, injury or hazard, including a near miss
- any non-compliance with KTF's Workplace Health and Safety Policy or Procedures,

they must report it to their immediate supervisor / manager, as well as, COO as soon as possible.

Where a hazard or near miss is identified and/or reported, the worker must submit an incident report to their supervisor/manager, who will work with the worker and the Workplace Health and Safety Coordinator to:

- identify, assess and select measures to control hazards and risks to health and safety
- monitor and evaluate hazard- and risk-control measures.

Incident reports are available from the COO.

## WORKERS' COMPENSATION

KTF must hold appropriate levels of workers compensation at all time within both Australia and PNG. If an employee develops an illness or injury in connection with work, they should report the incident to their supervisor as soon as possible and consider whether to submit a worker's compensation claim.

## LEGISLATION AND INDUSTRIAL INSTRUMENTS

Workplace health and safety laws do not operate in isolation, and other laws also regulate the conduct of employees and other stakeholders in the workplace. All officers, employees, contractors, suppliers and volunteers must observe and comply with all laws that relate to their engagement, including, but not limited to:

- Occupational health and safety laws that operate in each state and territory
- Workers' compensation legislation that operates in each state and territory
- Criminal laws, including recently introduced industrial manslaughter offences that operate in Victoria, NT, WA, Queensland and ACT at the time of writing (broadly, these offences expose individuals to significant penalties and possible incarceration for negligent conduct causing death in the workplace)
- Anti-discrimination laws (each Australian jurisdiction regulates discrimination on the basis of certain protected attributes including sex, race and age)
- Employment laws (including measures to address bullying at work under the Fair Work Act 2009).

**This policy and associated procedures are not intended to override any industrial instrument, contract, award or legislation.**



## REVIEW OF THE POLICY

KTF's Workplace Health and Safety Policy and Procedures will be reviewed at least every two years. The review will involve assessing the effectiveness of the policy and procedures by (among other things):

- reviewing overall health and safety performance
- ensuring continued compliance with the relevant legislation.

END