

OH&S Consultant Policy

Policy No: CC-PO-003

Process: Contractor Care & Payroll

1. PURPOSE

Paxus recognises that when Consultants are placed with client organisations, both Paxus and the client (as the host/site PCBU) have concurrent legal obligations under the Work Health and Safety Act 2011 (Cth) and applicable state legislation to manage safety.

This policy establishes Paxus's commitment to:

- Ensuring Consultants are fit and competent for placement
- Coordinating safety management with client organisations
- Supporting injury management in accordance with state workers' compensation legislation
- Monitoring compliance and responding to safety issues, regardless of where the Consultant works
- Maintaining transparent communication with consultants about their rights and obligations

Consultants placed with Paxus will work in compliance with both Paxus safety obligations and the client's site-specific safety requirements.

2. SCOPE

This policy applies to:

- All Consultants paid by Paxus (Direct Payroll, Company Consultants, Independent Consultants)
- All placements, regardless of duration (temporary, fixed-term, ongoing)
- All client organisations and work sites

This policy is read in conjunction with:

- Adcorp Group Workplace Health and Safety Policy (AHA-HSE-PO-001)
- Adcorp Psychosocial Policy (AHA-HR-PO-007)
- Anti-Discrimination, Harassment & Bullying Policy (AHA-HR-PO-008)
- Drugs and Alcohol Policy (AHA-HR-PO-012)
- Positive Duty to Prevent Sex-Based Harassment (AHA-HR-PO-001)

3. LEGISLATIVE FRAMEWORK AND OBLIGATIONS

Paxus operates under the Work Health and Safety Act 2011 (Cth), which establishes PCBU obligations.

Key principles:

- PCBU = Person Conducting a Business or Undertaking; Paxus is a PCBU for payroll and Consultant selection purposes
- The host/client is also a PCBU for the site and work environment they control
- Dual PCBU = both parties have concurrent, non-delegable duties
- Consultants are "workers" under the Act and have rights to be informed, consulted, and protected from harm

Paxus complies with:

Work Health and Safety Act 2011 (Cth)

Work Health and Safety Regulations 2011 (Cth)

- State-based legislation (QLD Work Health and Safety Act 2011; NSW, VIC, SA variations where Paxus operates)
- Relevant Codes of Practice (e.g., Hazard Identification & Risk Assessment, Psychosocial Hazards)

4. ROLES AND RESPONSIBILITIES

4.1 Paxus Responsibilities

Pre-Placement Screening & Competency

- Verifying consultant qualifications, experience, and any mandatory certifications required for the role
- Conducting background checks where appropriate
- Assessing the Consultant's fitness for the specific placement (physical/psychological capability)
- Identifying any pre-existing injury or health conditions that may require modified duties or monitoring

Induction & Information Provision

- Providing consultants with Paxus WHS information, including this policy, incident reporting procedures, and relevant group policies
- Ensuring consultants understand their rights and obligations under WHS legislation
- Advising consultants of any known hazards or client-specific safety requirements before placement
- Communicating to consultants that the client also has safety obligations and that consultants must comply with client site rules

Coordination with the Client

- Sharing consultant safety information with the client at placement (qualifications, any medical restrictions, relevant training)
- Confirming with the client what induction and site-specific training the client will provide
- Establishing clear communication channels for safety issues, incidents, and hazard reports
- Defining responsibility splits (e.g., Paxus provides general induction; client provides site-specific induction)

Monitoring & Oversight

- Maintaining regular contact with consultants during placement (frequency depends on role and risk profile)
- Responding to any safety concerns raised by the consultant or client
- Investigating incidents involving Paxus consultants, even if they occur on the client's site
- Verifying that the client is meeting its WHS obligations and that the consultant is safe

Injury Management & Return to Work

- Being the first point of contact for injury reporting (consultant contacts Paxus; Paxus notifies client)
- Coordinating with the client and relevant workers' compensation authority
- Facilitating early intervention and return-to-work processes in accordance with state legislation
- Maintaining confidentiality and supporting the consultant through injury and recovery

Incident Reporting & Investigation

- Recording all incidents involving Paxus consultants, irrespective of where they occur
- Investigating serious incidents (notifiable events under WHS Act) in conjunction with the client
- Taking corrective action where Paxus systems or processes contributed to the incident
- Ensuring lessons learned are captured and shared

4.2 Consultant Responsibilities

All consultants have a legal duty to take reasonable care of their own health and safety and not adversely affect others' safety.

Before Placement

- Declare any medical conditions, injuries, or restrictions that may affect their ability to perform the role safely
- Provide proof of qualifications, certifications, or experience claimed
- Inform Paxus of any factors (fatigue, substance use, mental health concerns) that may impair their safety

During Placement

- Comply with both Paxus and the client's WHS policies and procedures
- Use all provided personal protective equipment (PPE) and safe work systems correctly
- Follow the client's site rules and instructions (including access, emergency procedures, site-specific hazards)
- Report all hazards, near-misses, and incidents immediately to both the client (if on-site) and Paxus
- Cooperate with investigations and corrective actions
- Participate in any required training or inductions
- Raise any concerns about workload, bullying, harassment of any kind, or unsafe conditions promptly

Injury Reporting

- Report any injury, no matter how minor, to the client (if on-site) and to Paxus immediately
- Seek medical treatment if needed and obtain a medical certificate if required
- Keep Paxus informed of recovery progress and any medical restrictions
- Cooperate with return-to-work and injury management processes

Consultant Type Specifics

Direct Consultants (Paxus Payroll)

- Expected to comply with this policy and Paxus group policies
- Eligible for workers' compensation cover (via Paxus)
- Paxus responsible for payroll, tax, and ongoing monitoring

Company Consultants (ABN/Business)

- Responsible for their own WHS compliance, insurance, and tax
- Must declare their ABN and provide proof of public liability insurance where applicable
- Still bound by this policy when placed with a client
- Paxus will confirm insurance requirements with the client

Independent Consultants

- Responsible for their own WHS compliance and insurance
- Must comply with this policy during the placement
- Required to carry professional indemnity or public liability insurance appropriate to the role
- Paxus will verify insurance details before placement

4.3 Client Responsibilities

The client is a PCBU for the site and work environment. The client is responsible for:

- Providing a safe physical and psychological work environment
- Conducting site-specific inductions and training
- Managing site hazards and emergency procedures
- Supervising the consultant's work and performance

- Reporting incidents to Paxus immediately
- Cooperating with Paxus on safety monitoring and investigations
- Notifying Paxus of any safety concerns about the consultant's performance or health
- Managing injury reporting and return-to-work coordination with Paxus

Paxus will clarify these responsibilities in writing before each placement (e.g., in the Statement of Work or placement confirmation).

4.4 All Paxus Managers

Managers responsible for consultant placements must:

- Ensure pre-placement screening is completed
- Brief consultants on their obligations and Paxus's safety expectations
- Establish communication channels with the client's WHS contact or manager
- Respond promptly to any safety concerns or incidents
- Record all incidents and corrective actions
- Review consultant feedback or concerns about safety and escalate where needed

5. KEY POLICY AREAS

5.1 Pre-Placement & Induction

Paxus Pre-Placement Screening

Before placing a consultant, Paxus will:

- Review qualifications and experience against the role requirements
- Conduct a brief health/fitness assessment (may include medical questionnaire for high-risk roles)
- Check for any mandatory training or certifications (e.g., First Aid, specific IT security training)
- Brief the consultant on Paxus WHS expectations and this policy via onboarding processes
- Provide the consultant with Paxus WHS information (incident reporting, who to contact, relevant policies)

Consultant Induction by Paxus

Consultants will receive:

- Overview of this policy and relevant group policies
- Incident reporting procedures and contact details
- Explanation of dual PCBU responsibilities (Paxus + client)
- Information on how to raise safety concerns with Paxus
- Details of worker entitlements (if applicable under the engagement type)

Client Site Induction

The client is responsible for providing site-specific induction covering:

- Site layout, emergency procedures, evacuation routes
- Specific hazards relevant to the work environment (electrical, mechanical, chemical, psychological)
- Site rules, dress codes, access restrictions
- Who to contact for safety issues on-site
- Supervisor and team structure

Paxus will confirm in writing that the client has provided this induction.

5.2 Hazard Identification & Risk Management

Consultant Hazard Awareness

Consultants must be aware of common hazards in their work environment and report these to both the client and Paxus:

- Ergonomic hazards (posture, repetitive strain)
- Environmental hazards (noise, lighting, temperature)
- Psychological hazards (workload, isolation, conflict, harassment of any kind)
- Site-specific hazards (machinery, chemicals, heights, electrical)

Client Responsibility

The client is responsible for formally identifying site hazards and implementing controls. Paxus will monitor this indirectly through consultant feedback.

Paxus Hazard Response

If a consultant reports a hazard that poses a risk to their safety, Paxus will:

- Log the hazard report
- Follow up with the client to confirm what controls are in place
- Support the consultant in escalating the concern if the client does not respond adequately
- If the hazard is tied to Paxus systems (e.g., inadequate pre-placement screening), Paxus will implement corrective action

5.3 Incident Reporting & Investigation

Immediate Reporting

All incidents, injuries, near-misses, and hazards must be reported immediately:

1. Consultant notifies the client (if on-site) and/or a Paxus manager
2. Paxus records the incident within 24 hours
3. For notifiable events (serious injury, serious illness, fatality), Paxus will notify the relevant authority within the required timeframe

Paxus Investigation

Paxus will investigate all incidents involving consultants to determine:

- What happened and why
- Whether Paxus processes, policies, or pre-placement decisions contributed
- What corrective actions are needed (by Paxus, the client, or the consultant)

Client Cooperation

Paxus will request incident information and scene access from the client as needed.

5.4 Injury Management & Return to Work

Injury Reporting

Any injury must be reported to Paxus immediately, including:

- What happened
- What part of the body was affected
- Medical treatment sought
- Whether the consultant can continue working

Workers' Compensation

For Direct Consultants on Paxus payroll:

- Paxus provides workers' compensation cover under [relevant state scheme, e.g., ReturnToWorkSA, icare]
- The consultant has the right to claim benefits for work-related injury
- Paxus will support the claim and coordinate with the insurer

For Company/Independent Consultants:

- These consultants are responsible for their own insurance (or self-insurance)
- Paxus will verify appropriate cover is in place
- The client's workers' compensation may also cover the consultant; this will be clarified in the Statement of Work

Return to Work

Paxus is committed to supporting injured consultants to return to work as soon as it is safe and appropriate to do so. This may include:

- Modified duties at the client site (in consultation with the client)
- Gradual return (part-time to full-time)
- Alternative placements if the original role cannot be modified

Early intervention is key; Paxus will contact an injured Consultant within 24 hours of injury notification to discuss support needs.

5.5 Psychosocial Hazards

Paxus recognises that psychological safety is as important as physical safety. Consultants may be exposed to psychosocial hazards including:

- High workload or unrealistic deadlines
- Isolation or lack of support
- Bullying, harassment, or discrimination
- Role ambiguity or lack of feedback
- Work-life balance pressures

Consultant Responsibility

Consultants must report any concerns about workload, harassment, stress, bullying, or psychological distress to Paxus.

Paxus Response

Paxus will take concerns seriously and will:

- Listen and record the concern confidentially
- Discuss support options with the Consultant
- Raise concerns with the client if the client's practices are contributing (e.g., unrealistic deadlines, lack of support)
- Escalate to management if the client is non-responsive or if the issue involves bullying or discrimination

All consultants are entitled to a safe psychological work environment. Paxus will not tolerate bullying, harassment, or discrimination and will take action if these occur.

6. MONITORING, COMPLIANCE AND REVIEW

Paxus Monitoring

Paxus will monitor consultant safety through:

- Regular check-ins with consultants during placement (frequency depending on role and risk)
- Periodic feedback from clients about consultant performance and safety
- Analysis of incident trends and near-miss reports
- Annual review of this policy and supporting procedures

Client Feedback

Clients will be asked to provide feedback on consultant safety performance, including whether the Consultant:

- Complied with site safety rules
- Used PPE correctly
- Reported hazards and incidents
- Raised any concerns

Corrective Action

If a consultant is not complying with safety requirements, Paxus will:

- Discuss the issue directly with the consultant
- Provide additional training or support if needed
- Document the conversation
- If the issue is serious or recurring, consider whether the consultant can be safely placed in future roles

7. RELATED DOCUMENTATION AND LEGISLATION

Adcorp Group Policies

- AHA-HSE-PO-001: Workplace Health and Safety Policy
- AHA-HR-PO-007: Psychosocial Policy
- AHA-HR-PO-008: Anti-Discrimination, Harassment & Bullying Policy
- AHA-HR-PO-012: Drugs and Alcohol Policy
- AHA-HR-PO-001: Positive Duty to Prevent Sex-Based Harassment

Legislation

- Work Health and Safety Act 2011 (Cth)
- Work Health and Safety Regulations 2011 (Cth)
- Work Health and Safety Act 2011 (QLD) [and other state variations as applicable]
- [Relevant state] Workers' Compensation Act

Codes of Practice

- Managing Work Health and Safety Risks (Safe Work Australia)
- Managing Psychosocial Hazards at Work (Safe Work Australia)
- First Aid in the Workplace