Geelong Lutheran College is committed to providing a safe environment for all students and staff at the College.

Definitions
The College: Geelong Lutheran College St John's Newtown and Armstrong Creek
Parents: Parents, Guardians, Caregivers

Introduction
We are committed to taking all reasonable steps to eliminate psychosocial hazards in the workplace.

Purpose
The purpose of this Policy is to outline Geelong Lutheran College commitment, and the measures taken, to addressing psychosocial hazards in the workplace.

Rationale
Psychosocial hazards are any factors in the work design, systems of work, management of work, carrying out of work, or personal or work-related interactions that may arise in the working environment and may cause workers to experience one or more negative psychological responses that create a risk to health or safety.

Workers are likely to be exposed to a combination of psychosocial hazards. Some hazards may always be present while others may only occur occasionally. The effect of a combination of hazards may increase the risk of harm whereas the impact of each hazard taken by itself may be low.

Psychological injuries that may arise from or be exacerbated by exposure to psychosocial hazards include:
- depression
- anxiety
- burnout
- self-harm or suicidal thoughts
- post-traumatic stress disorder (PTSD).

An increased risk of physical consequences, such as cardiovascular disease, gastrointestinal disorders, immune deficiency and musculoskeletal disorders, may also arise from exposure to psychosocial hazards.

Geelong Lutheran College recognises that individual differences may make some workers more susceptible to harm from exposure to the same hazard, and some workers may be at greater risk from psychosocial hazards. This will be taken into consideration where this is foreseeable.

Scope
This Policy and its Procedures apply to all staff, volunteers, and contractors at the College. This Policy and its Procedures also cover any activities of the College that may affect the health and safety of other individuals, including students, parents, and other non-workers.

Roles and Responsibilities

Geelong Lutheran College is responsible for ensuring the health and safety of workers while at work. The College must also ensure the health and safety of other persons (such as students, parents, and other non-workers) are not put at risk from College activities. Geelong Lutheran College , in consultation with workers, is responsible for identifying reasonably foreseeable psychosocial hazards in the workplace and eliminating them, or if that is not reasonably practicable, minimising those risks so far as is reasonably practicable. More detailed responsibilities are set out in the procedures below.

College's Policy

Geelong Lutheran College will seek to eliminate the risks of harm arising from psychosocial hazards in the workplace or if that is not reasonably practicable it will take the following measures to minimise the risk of harm:

- consult workers at all stages of the process
- identify all reasonably foreseeable psychosocial hazards arising from, or likely to arise in, the workplace or from work activities
- monitor staff's health and safety and be alert to any changes in circumstances that may indicate that there is a new or heightened risk of psychological harm to individuals
- assess the risk of harm arising from each psychosocial hazard
- implement control measures to eliminate or minimise the risk of harm
- record the applicable psychosocial hazards in the Hazard register
- ensure that procedures are in place to facilitate staff raising issues that present a risk of harm from a psychosocial hazard
- have procedures in place to respond to reports of a psychosocial risk or incident
- notify WorkSafe of serious incidents, injuries or death
- following any incident, conduct a post-incident review of the effectiveness of control measures
- monitor and review control measures on an ongoing basis in consultation with workers.

Geelong Lutheran College will consult staff at all stages of the process of identifying psychosocial hazards, assessing their risk to health and safety, making decisions about control measures, and reviewing their effectiveness. Geelong Lutheran College will strictly maintain confidentiality in individual cases.

Geelong Lutheran College recognizes that the identification, assessment, and control of psychosocial hazards is an ongoing process that requires ongoing monitoring and consultation.

Procedures

Identify the Hazards

Geelong Lutheran College will seek to identify all reasonably foreseeable psychosocial hazards arising from, or are likely to arise in, the workplace or from work activities. When identifying hazards, the College considers the organisation context (e.g., size, location, and environmental conditions) as well as the type of work undertaken by workers (e.g., their workloads, roles, and responsibilities).

Hazard identification is an ongoing process as individuals and workplace circumstances change or situations may have a cumulative impact.

Consulting with staff and our OH&S representatives is critical to capturing foreseeable hazards. This may involve surveys or conducting workshops to gather information.

Possible other sources which may provide relevant information regarding foreseeable hazards include reviewing:

- records of injuries, incidents, or workers' compensation
- worker complaints and investigations
- reports from workplace inspections
- staffing, resourcing, procurement, and refurbishment decisions
- work systems, policies, governance arrangements and procedures
- position descriptions and performance agreements
- records of hours worked
- absenteeism
- turnover data and exit interviews
- Occupational Health and Safety Committee meeting records; and
- changes in the workplace including organisational restructuring, staff absences, changes to working conditions or working environment.

Ongoing Monitoring to Identify and Assess Risks
The Heads of School, Business Manager and/or Line Manager will monitor staffs' health and safety and be alert to any changes in circumstances that may indicate that there is a new or heightened risk of psychological harm to individuals. This will include regular consultation and monitoring of unplanned absences, reductions in productivity and efficiency, increases in conflict, internal and external complaints, any decline in engagement, morale, and team unity.

Where appropriate, Managers will respond promptly to avoid issues escalating.

Managers will be alert to the health and safety of individual workers such as new workers, or those affected by illness or injury, or difficult personal situations, who may require additional support or reasonable adjustments, such as assigning mentors or providing flexible work arrangements.

Managers will be supported in developing skills in monitoring and responding appropriately to psychosocial hazards.

Assess the Risks
Geelong Lutheran College will assess the risk of harm, based on the likelihood of harm arising from the hazard, and the likely consequences such as the seriousness of harm arising from each hazard. The following should be taken into consideration in assessing the overall risk of harm:

- **Duration** – How long is the staff member exposed to the hazards or risks? Occasional long hours at work may not be a significant risk but the risk of harm increases if this occurs over a lengthy period.
- **Frequency** – How often is the worker exposed to the hazards or risks? The effect may be cumulative, such as work stresses.
- **Severity** – How severe are the hazards and the workers' exposures? The severity of a traumatic situation may vary both objectively and in the way it may affect particular individuals (where foreseeable).

Some staff may be at greater risk from psychosocial hazards. Situations where staff may be at greater likelihood or severity of harm include:

- young or new staff with limited experience in the workplace, who may not know or have the confidence to raise issues
- barriers to understanding safety information such as literacy or language
- perceived barriers to raising safety issues such as power imbalance, stigma, or where mechanisms for raising issues are unclear
- previous exposure to a hazard, such as exposure to traumatic events, may make the worker at greater risk of harm if they were to experience another traumatic event
- having an existing disability, injury, or illness
- workers who are experiencing difficult personal circumstances
- workers who are exposed to multiple psychosocial hazards

Ongoing monitoring will inform any changes to the risk rating of various hazards over time.

Controlling the Risks: Hierarchy of Controls

Geelong Lutheran College must implement control measures to eliminate psychosocial risks as far as is reasonably practicable. If it is not reasonably practicable to eliminate a psychosocial risk, the College must reduce the risk so far as is reasonably practicable by doing one or more of the following:

- altering the:
    - management of work (e.g., eliminating unnecessary processes, upskilling leaders in managing poor workplace behaviours)
    - plant (e.g., replacing frequently malfunctioning equipment that causes frustration or increased work pressures)
    - systems of work (e.g., reviewing systems in place to manage high job demands)
    - work design (e.g., ensuring workers have the right resources and equipment to do their work)
    - workplace environment (e.g., installing physical access barriers, surveillance cameras or duress and alarm systems to reduce the risk of harm from aggression or violence)
- using information, instruction, or training.

Information, instruction, or training controls are considered to provide the least level of protection and must not be the predominant control measure when using a combination of controls. The College may only use information, instruction, or training as the only risk control measure where no other control measures are reasonably practicable.

Measures to eliminate or minimise the risk of harm arising from psychosocial hazards will be developed in consultation with staff and our OH&S representatives. The College will first consider any available controls and apply those that provide the highest level of protection and reliability.

A combination of controls should be implemented where this will provide the most effective level of protection. The College must ensure that any control measures implemented are properly installed (if applicable), used, and maintained.

Controlling the Risks: Considering Appropriate Control Measures
In deciding on the appropriate control measures, Geelong Lutheran College will take into account all relevant matters, including:
- the duration, frequency, and severity of the exposure of staff and other persons to the psychosocial hazards
- how the psychosocial hazards may interact or combine.
- the design of work, including job demands and tasks.
- the systems of work, including how work is managed, organised and supported
- the design, layout, and environmental conditions, of the workplace, including the provision of:
  - safe means of entering and exiting the workplace
  - facilities for the welfare of workers
- the plant, substances, and structures at the workplace
- workplace interactions or behaviours
- the information, training, instruction, and supervision provided to workers
- where provided, the design, layout, and environmental conditions of workers' accommodation,

Recording Psychosocial Hazards in the Hazard Register
Geelong Lutheran College will record each psychosocial hazard in the GLC hazard register together with its risk assessment and the associated control measure or measures.

Reporting Issues
Geelong Lutheran College will ensure that procedures are in place to facilitate workers raising issues that present a risk of harm from a psychosocial hazard. Individuals who raise concerns regarding psychosocial hazards will not suffer any detriment as a result of making a report in good faith.

If reporting concerns regarding bullying, discrimination or harassment, staff should refer to the following Policies:
- Bullying Prevention and Intervention Policy
- Staff Anti Bullying Policy
- Equal Opportunity and Discrimination Policy
- Workplace Anti Bullying Procedure

Responding to a Report of a Psychosocial Risk or Incident
In the event of a critical psychosocial incident, it is our policy that Geelong Lutheran College will:
- in the case of an emergency, contact relevant emergency services and specialist personnel such as Police, Youth Resources Officers, and ambulance services
- follow the OHS Incident Management Policy and Procedures
- in the case of traumatic events, follow our Critical Incident Management for Traumatic Events Policy and Procedures
- ensure that competent persons promptly investigate.

Where the matter is not an emergency, Geelong Lutheran College will promptly assign competent individuals to investigate and, where appropriate, seek solutions in a consultative way with affected parties. An investigation may involve external specialist personnel.

Investigations conducted into psychosocial incidents will be fair and impartial and ensure that affected parties will:

- have their privacy and confidentiality protected
- receive a copy of all relevant policies and procedures
- be kept informed of their rights, obligations, possible outcomes, and relevant timeframes; and
- be provided with adequate support during this process, which may include external parties

While an investigation is ongoing, Geelong Lutheran College will control any associated risks to eliminate or minimise the risk of further harm.

Post Incident Response

Geelong Lutheran College, in consultation with staff, OH&S representatives, and any specialist personnel if relevant, will determine any reasonably practicable controls to eliminate or minimise the risk of harm occurring if it is determined that existing controls were not effective in controlling the events that led to the incident, or whether there is a new hazard.

Where the incident relates specifically to an individual worker's situation, Geelong Lutheran College will work with the individual and any external specialists, such as their treating health practitioners where consent has been given, to support them and make any reasonable adjustments, consistent with privacy and anti-discrimination laws and the safety of the individual and others affected by their actions.

Geelong Lutheran College will update the College's hazard register and control measures accordingly.

If the incident has resulted in an employee not being able to immediately return to their full pre-injury duties, Geelong Lutheran College will implement our rehabilitation and return-to-work planning.

Geelong Lutheran College will monitor all staff and proactively manage any new OHS hazards that may arise from the incident or the post incident changes.

Monitor and Review Control Measures

Geelong Lutheran College in consultation with workers and any OHS representatives will monitor and review control measures on an ongoing basis to ensure that they are effective.

A review will also be conducted:

- When Geelong Lutheran College concludes that the control measure is not eliminating or minimising the risks so far as is reasonably practicable
- When a notifiable incident involving a psychosocial hazard occurs
- Before a change to a thing, process or system of work that is likely to affect the risks associated with psychosocial hazards (e.g., a change to organizational structure, work location, environment, work processes or procedures, equipment, employment conditions)
- If a new hazard or risk is identified
- If new or additional information about a psychosocial hazard becomes available
- If consultation with workers or others indicates that a review is necessary
- If a worker (or someone on behalf of a worker) reports a psychological injury or psychosocial hazard; or
- If an OHS representative requests a review on reasonable grounds.

Workers Duties

Workers must:
- Take reasonable care to not adversely affect the health and safety of other persons
- Comply with reasonable health and safety instructions, as far as they are reasonably able, and cooperate with reasonable health and safety policies or procedures that have been notified to workers
- Promptly report concerns regarding psychosocial hazards
- Promptly report any harm to themselves or others arising from psychosocial hazards
- Take reasonable care of their own health and safety

Implementation

This Policy is implemented through a combination of:
- Consultation with staff
- Monitoring of conditions and changing conditions
- Monitoring of staff psychosocial health and safety
- Effective reporting procedures
- Information and training of Managers
- Prompt implementation of corrective actions where necessary.

Breach

Breach of this Policy and its Procedures may result in disciplinary action.

Definitions

Examples of Psychosocial Hazards

The following types of psychosocial hazards in a workplace may present a risk of harm:

Hazard	Descriptions
Job demands	- Intense or sustained high mental, physical or emotional effort required to do the job. - Unreasonable or excessive time pressures or role overload. - High individual reputational, legal, career, safety, or financial risk if mistakes occur. - High vigilance required, limited margin of error and inadequate systems to prevent individual error. - Shifts/work hours that do not allow adequate time for sleep and recovery. - Sustained low levels of physical, mental, or emotional effort is required to do the job. - Long idle periods while high workloads are present, for example, where workers need to wait for equipment or other workers.
Low Job Control	- Staff have little control over aspects of the work including how or when the job is done. - Staff have limited ability to adapt the way that they work to changing or new situations. - Staff have limited ability to adopt efficiencies in their work.

	• Tightly scripted or machine/computer paced work. • Prescriptive processes which do not allow staff to apply their skills and judgement. • Levels of autonomy not matched to staffs' abilities.
Poor Support	• Tasks or jobs where staff have inadequate support including practical assistance and emotional support from Heads of School, Business Manager and/or Line Manager and colleagues, or inadequate training, equipment, and resources for a task.
Lack of role clarity	• Uncertainty, frequent changes, conflicting roles or ambiguous responsibilities and expectations.
Poor organizational change management	• Insufficient consultation, consideration of new hazards or performance impacts when planning for and implementing change. • Insufficient support, information, or training during change. • Not communicating key information to workers during periods of change.
Inadequate reward and recognition	• Jobs with low positive feedback or imbalances between effort and recognition. • High level of unconstructive negative feedback from Heads of School, Business Manager and/or Line Manager and others. • Low skills development opportunities or underused skills.
Poor organisational justice	• Inconsistent, unfair, discriminatory, or inequitable management decisions and application of policies, including poor procedural justice.
Traumatic events or material	• Experiencing fear or extreme risks to the health or safety of themselves or others. • Exposure to natural disasters, or seriously injured or deceased persons. • Reading, hearing, or seeing accounts of traumatic events, abuse, or neglect. • Supporting victims or investigating traumatic events, abuse, or neglect.
Remote or isolated work	• Working in locations with long travel times, or where access to help, resources or communications is difficult or limited.
Poor physical environment	• Exposure to unpleasant or hazardous working environments.
Violence and aggression	• Violence, threats of violence, or assault from students, parents, visitors, or other staff, including workers of other businesses. • Aggressive behaviour such as yelling or physical intimidation.
Bullying	• Repeated unreasonable behaviour directed towards a staff member, or group of staff, that creates a risk to health and safety. This includes bullying by staff, parents, visitors, and others.

Harassment including sexual harassment	• Harassment due to personal characteristics such as age, disability, race, nationality, religion, political affiliation, sex, relationship status, family or carer responsibilities, sexual orientation, gender identity, or intersex status. • Sexual harassment. • Harmful behaviour that does not amount to bullying (such as single instances) but creates a risk to health and safety.
Conflict or poor workplace relationships and interactions	• Poor workplace relationships or interpersonal conflict between colleagues or from other businesses. • Frequent disagreements, disparaging or rude comments, either from one person or multiple people. A staff member can be both the subject and the source of this behaviour. • Inappropriately excluding a worker from work-related activities. • A hostile work environment.

Source of Obligation
- Occupational Health and Safety Act 2004 (Vic)
- Occupational Health and Safety (Psychological Health) Regulations 2025 (Vic)
- WorkSafe Victoria Compliance Code: Psychological Health

References and Resources

WorkSafe Victoria A Guide for Employers Preventing and Managing Work-Related Stress

Evaluation
This Policy will be reviewed as form part of the College's two-year review cycle.

Policy Administration

Responsible Person/s	Approver	Date Approved	Next Review
Executive Principal	College Board	February 2026	February 2028