



Document Type	Policy
Document ID	WHS P 1.12
Document Circulation	Internal

# CONTRACTOR SAFETY POLICY

## TABLE OF CONTENTS

1	Purpose.....	1
2	Scope and Applicability.....	3
3	Definitions.....	3
4	Policy.....	4
4.1	Objectives.....	4
5	Consequences of Policy Breach.....	5
6	Roles and Responsibilities .....	5
7	Committees and Working Groups.....	9
8	Related Documents.....	10
9	Document Control .....	10

## 1 Purpose

This Policy sets out the approach of The Bethanie Group Inc, Bethanie Housing Ltd, and their respective subsidiary entities (collectively known as Bethanie) to ensure, so far as is reasonably practicable, the work, health and safety (WHS) of all contractors, subcontractors, their employees and labour hire employees undertaking work for Bethanie (collectively known as contractors). The purpose of this policy is to describe how Bethanie complies with its obligations as a Person Conducting Business or Undertaking (PCBU), under WHS laws and exercises its duty of care to contractors, workers, customers, visitors and other persons who may perform or be impacted by work undertaken or completed on behalf of Bethanie.

Under WHS legislation in Western Australia, contractors, subcontractors, their employees and labour hire employees are classified as workers. As a PCBU, Bethanie has a duty to ensure, so far as is reasonably practicable, the health and safety of all workers undertaking work for Bethanie. Contractors may be more vulnerable to hazards for a variety of reasons including:

- the work they perform;
- the environment in which they perform the work;
- equipment available for the task;
- limited direct supervision or support;
- knowledge regarding hazards, likelihood of the hazard or risk occurring and the degree of harm from the hazard or risk;



- knowledge of how to eliminate or minimise the hazard or risk and / or availability and suitability of controls to eliminate or minimise the risk;
- knowledge of Bethanie business areas, hazards, work systems and WHS management system; and
- other factors that Bethanie may be unaware of such as health conditions, fatigue, level of experience, working hours, previous work tasks, training, knowledge and skill set.

Bethanie is committed to meeting contractor safety requirements under the WHS legislation and the objectives outlined in this policy by engaging contractors who have been externally accredited to ISO AS/NZS 45001:2018, where reasonably practicable, particularly for high risk tasks (refer to definitions). All other contractors, including those bidding on capital works projects, minor works, and maintenance will be assessed for WHS requirements during the tender, quotation, and contract renewal processes.

Contractors may be audited on WHS systems, periodically while undertaking work for or on behalf of Bethanie, in a consultative and collaborative manner with a focus on shared learnings and continuous improvement.

Bethanie recognises that as a PCBU, they are required to meet legislative obligations to all workers, however, meeting these obligations may be more complicated where a contractual chain exists (i.e. contractor engages a subcontractor or multiple contractors have been engaged). Duties may be shared between PCBU's and persons may be considered both a worker and PCBU under the legislation. Within a contractual chain, PCBU's are required to consult, coordinate and cooperate with other shared duty holders under the Work, Health and Safety Act 2020.

For these reasons, Bethanie is committed to meeting the following obligations:

- Engaging with contractors to understand how to protect and ensure the safety of customers, workers and other persons when contractors are undertaking works and confirming actions to be completed by all parties;
- Understanding what Bethanie is required to do to ensure the safety and wellbeing of any contractors while undertaking works;
- Where works are high risk, it is preferred to document the above discussions and actions in writing to ensure all parties understand their obligations and required actions; and
- Bethanie will not instruct or direct contractors in how they should perform their works but may instruct contractors to cease works if any WHS or other concerns are identified.

Contractors who have been assessed and deemed appropriate for Bethanie via Bethanie Procurement are known as "preferred" contractors. Preferred contractors are required to comply with this policy so far as is reasonably practicable and comply with Bethanie electrical safety and working at height requirements, where relevant.

Bethanie employees can only engage Procurement preferred contractors with agreement from Property Operations. The use of a One Time Vendor (OTV)



procurement process to pay contractors retrospectively is considered a serious breach of this policy and may be subject to disciplinary action.

## 2 Scope and Applicability

<b>Who</b> must use this policy:	<ul style="list-style-type: none"><li>• All Bethanie employees who procure, authorise, supervise, allocate duties and evaluate contractors across Bethanie business units. This includes the use of contractors for maintenance and repair work, agency staff and labour hire staff.</li><li>• Contractors, sub-contractors and workers of contractors and subcontractors who have been contracted to perform work for or on behalf of Bethanie Group.</li></ul>
<b>Why</b> this policy is important:	<ul style="list-style-type: none"><li>• To ensure safe systems of work are in place across Bethanie business areas to ensure the health and safety of workers including contractors, sub-contractors, their employees and labour hire employees.</li><li>• Comply with legislative obligations under the Work, Health and Safety Act 2020 and the Work, Health and Safety Regulations 2022.</li><li>• Describe Bethanie's commitment to contractor safety.</li></ul>
<b>When</b> this policy applies:	<ul style="list-style-type: none"><li>• This policy applies whenever contractors are undertaking work within Bethanie's workplaces or on behalf of Bethanie.</li><li>• For the purposes of this policy the term contractors includes contractors, subcontractors, employees of contractors or subcontractors, labour hire employees, trainees, apprentices, or outworkers.</li></ul>
<b>Who</b> to ask for more information:	<ul style="list-style-type: none"><li>• Work, Health and Safety Team</li><li>• Bethanie Property Operations</li><li>• Bethanie Procurement</li><li>• Contract Owner</li><li>• Your Manager</li></ul>

## 3 Definitions

Term	Definition
Contractors	Contractors, including independent contractors and subcontractors, run their own business and sell their services to others. Contractors will often use their own processes, tools and methods to complete their work. They may negotiate their own fees and working arrangements and can work for more than one client at a time.



<b>Term</b>	<b>Definition</b>
Contractual chain	A contractual chain refers to the situation where, in relation to the same project or work matter, there are multiple contractors and subcontractors.
High risk work	Any works in which contractors are required to work with high risk hazards. This includes but is not limited to electrical works, working at heights, working in a roof space or confined space, gas installation / repair, hot works, exposure to asbestos or other hazardous dusts and demolition works.
Labour hire	Labour hire workers are workers who are directly employed by an agency which then 'on-hires' them to perform labour for a different employer. The first company is responsible for payment and other employee entitlements. The second company directs the worker tasks.
Persons conducting a business or undertaking (PCBU)	A person conducting a business or undertaking (PCBU) is a broad concept that extends beyond the traditional employer-employee relationship to include all types of modern working arrangements.
Preferred contractors	Contractors who have been assessed and deemed suitable to provide services to Bethanie through an approved Procurement process.
Sub-contractors	An individual or business firm contracting to perform part or all of another's contract.
Workers	<p>Under the Work, Health and Safety Act 2020 in Western Australia, workers are classified as anyone who carries out work in any capacity for a PCBU including employees, contractor or subcontractors, an employee of a contractor or subcontractor, an employee of a labour hire company who has been assigned to work in the PCBU, an outworker, an apprentice or trainee, a student gaining work experience, a volunteer and a person of a prescribed class.</p> <p>The PCBU has WHS obligations towards all workers under the legislation.</p>

## **4 Policy**

### **4.1 Objectives**

A policy objective is a desired outcome that Bethanie wants to achieve through this policy:

- To eliminate risks so far as is reasonably practicable, or if this is not possible, minimise risks so far as is reasonably practicable for contractors undertaking work for or on behalf of Bethanie.
- Provide and maintain a work environment that is without risk to the health and safety of workers including contractors, customers and others, so far as



is reasonably practicable.

- Develop, implement, evaluate and continuously improve WHS systems of work for contractors and Bethanie across all business areas and projects, where reasonably practicable, through regular reviews, evaluations, feedback, consultation agreed actions and shared learnings.
- Ensure contractors have WHS management systems as a requirement of any tender or procurement process;
- Determine and implement an agreed process for monitoring contractor WHS performance;
- Consult, cooperate and coordinate with contractors regarding WHS risks and controls;
- Ensure Manager responsibilities are clearly defined for contractor safety management that complies with WHS legislation, so far as is reasonably practicable;
- Report and investigate hazards and incidents related to contractors in a collaborative manner to improve safety management systems and share learnings across all stakeholders;
- Have systems in place to identify, review and resolve WHS issues during works or contract period for contractors;
- Ensure contractors are provided with adequate information including but not limited to: induction information, procedures, sites rules, sign in/out registers, hazard and incident reporting systems, registers (i.e. asbestos and hazardous materials), and emergency procedures. This also includes known or potential hazards regarding the work task, equipment or environment including heights, electricity, asbestos, essential services, infection prevention and control measures, clinical factors including resident behaviours;

## 5 Consequences of Policy Breach

- This policy is binding on Bethanie employees and contractors, as per Section 2: Scope and Applicability.
- Roles and Responsibilities in relation to this policy are set out in Section 6 below.
- Failure to comply with the policy may constitute a breach of the Bethanie Code of Conduct and business practices.

## 6 Roles and Responsibilities

Role	Responsibilities
Board	<ul style="list-style-type: none"><li>• Maintain oversight and is ultimately responsible for ensuring organisation-wide compliance.</li><li>• Monitor Bethanie's contractors safety performance and seek to independently verify systems of work are effective in the context of the organisation's risk.</li></ul>



Role	Responsibilities
Executive	<ul style="list-style-type: none"><li>• Endorse policies, frameworks, procedures and supporting documentation that are conducive to meeting legislative compliance for contractor safety.</li><li>• Exercise due diligence to ensure that the requirements of the contractor safety management system integrate effectively with Bethanie's business processes.</li><li>• Assign clear responsibilities and expectations to Managers with regards to contractor safety.</li><li>• Monitor contractor WHS incidents, investigations and subsequent actions and promote a continuous improvement focus across the organisation.</li><li>• Seek to understand the organisational risks with regards to contractor safety and implement strategies to minimise the risk of injury or ill health to contractors and others.</li></ul>
Procurement	<ul style="list-style-type: none"><li>• Consider WHS in all procurement systems and require WHS management system information for all tenders and procurement processes.</li><li>• Oversee existing contracts including contractor WHS performance and opportunities for improvement.</li><li>• Ensure WHS system information is assessed during tender and procurement processes so that suppliers are aware of Bethanie's WHS requirements and can demonstrate their ability to meet these requirements.</li><li>• Evaluate WHS performance as part of contractor evaluation process.</li><li>• Ensure contractors are provided with this policy and information on Bethanie's WHS requirements for electrical safety and working at heights.</li><li>• Contribute to monitoring contractor performance through a series of data inputs including agreed performance measures, feedback, costs, responsiveness,</li></ul>
Property Operations	<ul style="list-style-type: none"><li>• Oversee maintenance and project work across all Bethanie business units;</li><li>• Contribute to monitoring contractor performance through a series of data inputs including agreed performance measures, feedback, costs, responsiveness, complaints and WHS performance;</li><li>• Approve engagement of preferred contractors in consultation with Bethanie business units, WHS and Procurement.</li><li>• Allocate jobs to qualified and Bethanie preferred contractors.</li></ul>



<b>Role</b>	<b>Responsibilities</b>
	<ul style="list-style-type: none"><li>• Report any WHS issues to Bethanie WHS and seek to resolve these issues at the local level through a consultative process, where possible.</li><li>• Identify opportunities for improving contractors safety and seek to implement these with support from other key stakeholders.</li></ul>
Property Development	<ul style="list-style-type: none"><li>• Oversee Bethanie projects including construction and major works including renovations and major refurbishment while also overseeing contractor safety in the form of:</li><li>• Attend regular site meetings in which WHS is a standing agenda item;</li><li>• Participate in contractor hazard and incident reporting, investigations and subsequent corrective actions;</li><li>• Undertake site inspections incorporating onsite observations and walk arounds on a regular basis;</li><li>• Consult with contractors regarding effective control measures for high risk hazards, if less effective controls are identified.</li><li>• Members of the Property Department may seek additional advice from the WHS Department as required to effectively manage identified hazards during the works.</li><li>• Approve engagement of preferred contractors in consultation with Bethanie business units, WHS and Procurement.</li><li>• Evaluate contractor WHS performance as part of the overall contract evaluation.</li></ul>
ICT	<ul style="list-style-type: none"><li>• Oversee and facilitate Cred-Entry access and invites suitably qualified contractors to set up their account for site access.</li><li>• Monitor contractor registration with Cred-Entry and inform Procurement, Property Operations and WHS.</li></ul>
Managers	<ul style="list-style-type: none"><li>• Ensure a contractor management system, where available, is utilised for contractors entering and leaving Bethanie business units.</li><li>• Submit work orders to preferred contractors and provide a purchase order prior to works being undertaken.</li><li>• Consult with contractors to identify hazards, assess risks and implement control measures to reduce the risk of injury.</li><li>• Ensure contractor equipment is suitable for the task, so far as is reasonably practicable.</li><li>• Report all contractor hazards and incidents.</li></ul>



<b>Role</b>	<b>Responsibilities</b>
	<ul style="list-style-type: none"><li>• Participate in contractors safety investigations and risk assessments to identify areas for improvement.</li><li>• Where safety concerns are identified, consult with contractors and where necessary, instruct contractors to cease works until safety concerns are adequately addressed through a process of escalation and consultation.</li></ul>
WHS Department	<ul style="list-style-type: none"><li>• Report any contractor WHS issues to the contract owner and seek to resolve these issues at the local level where possible.</li><li>• Identify opportunities for improving contractor and / or Bethanie safety management systems and seek to implement these with support from other key stakeholders.</li><li>• Conduct contractor audits and consult with contractors to address any identified WHS concerns.</li></ul>
Contractors	<ul style="list-style-type: none"><li>• Complete registration into Cred-Entry for all workers and ensure all workers have completed the Bethane contractor induction module.</li><li>• Comply with this contractor safety policy so far as is practicable.</li><li>• Report any hazards or incidents to Bethanie as soon as reasonably practicable.</li><li>• Comply with the inherent requirements of Bethanie's electrical safety and working at heights procedure.</li><li>• Take reasonable care for their own health and safety.</li><li>• Take reasonable care that any act or omission does not negatively affect the health and safety of Bethanie workers, customers, visitors or other persons.</li><li>• Comply with any reasonable instruction provided by Bethanie.</li><li>• Participate in WHS audits in a consultative and collaborative manner.</li><li>• Provide feedback and engage with Bethanie where issues are identified and unable to be resolved at the local level.</li></ul>
Administration staff	<ul style="list-style-type: none"><li>• Ensure contractors log in and out of the site via Cred-Entry;</li><li>• Report any contractors who are not registered into Cred-Entry to the Manager or Property Operations.</li></ul>
Bethanie employees	<ul style="list-style-type: none"><li>• Report workplace hazards and incidents relating to contractor safety in ARCH and escalate to Manager if high risk.</li><li>• Consult with Bethanie on WHS issues regarding contractors.</li></ul>



<b>Role</b>	<b>Responsibilities</b>
	<ul style="list-style-type: none"><li>• Assist contractors to report WHS hazards and incidents.</li></ul>
Health and Safety Representatives	<ul style="list-style-type: none"><li>• Assist with incident investigation, hazard management and WHS risk assessments for contractor safety.</li><li>• Consult with Bethanie to improve contractor safety WHS systems.</li></ul>

## **7 Committees and Working Groups**

<b>Committee / Working Group</b>	<b>Contribution</b>
Bethanie WHS Committee's	<ul style="list-style-type: none"><li>• Monitoring of hazards, incidents and injuries across Bethanie including those involving contractors.</li><li>• Monitoring of preventative measures towards workplace hazards, including WHS risk assessments, investigation findings and actions, training and continuous improvement initiatives related to contractor safety.</li><li>• Consultation across the Bethanie workforce and services including contractors, where practicable.</li></ul>
Executive Team Meeting	<ul style="list-style-type: none"><li>• Continuous monitoring of WHS performance and emerging trends for contractor safety.</li><li>• Maintain oversight of WHS risks via the organisational risk register including contract management.</li></ul>



## 8 Related Documents

### Legislation

*Work, Health and Safety Act 2020*

*Work, Health and Safety Regulations 2022*

### Governance frameworks & policies

*Work Health Safety and Wellbeing Framework*

### References

*Work, Health and Safety Act 2020 - Western Australia Legislation website*

*Work, Health and Safety Regulations 2022 - Western Australia Legislation website*

*WHS Duties in a contractual chain: Factsheet - Safe Work Australia website*

## 9 Document Control

Approved by	Operational Management Team	Next Review	November 2026
Document Owner or Author	GM - WHS	Review Cycle	1 yearly
Version Number	V3	Version Date	November 2025
Description of Change	Updated due to transition back to internal maintenance and Bethanie management of external contractors		
Positions Consulted	Property Operations, Procurement, Steering Committee Grounds, Gardens and Maintenance, A E Hoskins.		
Key Words	Contractor, safety, high risk works, sub-contractor.		
Previous Versions	Description of Changes	Position	Date
V1	Maintenance Manager responsibilities included	GM - WHS	November 2024
V2	Permit to work references deleted	GM - WHS	January 2025