
Work Health and Safety Policy

Greenway Plan Management Pty Ltd • Registration Group 0127 • Version 1.0

This policy describes how Greenway Plan Management Pty Ltd manages work health and safety for its staff and the participants it serves. As a plan management business (Registration Group 0127), our work environment is office and remote-based.

This policy meets the requirements of the NDIS Practice Standards and the Work Health and Safety Act 2011 (Cth).

1. Purpose

Greenway Plan Management Pty Ltd is committed to providing a safe and healthy work environment for all staff, contractors, and volunteers whether working from an office or remotely from home.

This policy sets out our obligations and approach to managing work health and safety (WHS) in the context of NDIS plan management service delivery. It applies to all work activities undertaken by or on behalf of Greenway Plan Management.

2. Scope

This policy applies to:

- All staff, including full-time, part-time, and casual employees
- Contractors and subcontractors engaged to perform work on behalf of the company
- Any person working remotely or from a home office

It covers all work activities related to NDIS plan management, including invoice processing, participant communication, budget management, use of digital systems, and interaction with service providers and the NDIA.

3. Legislative Framework

Greenway Plan Management Pty Ltd operates in accordance with:

- Work Health and Safety Act 2011 (Cth) and applicable state/territory WHS legislation
- Work Health and Safety Regulations 2011 (Cth)

- National Disability Insurance Scheme Act 2013
- NDIS Practice Standards — Verification Module (May 2025)
- Privacy Act 1988 (Cth) — relevant to data security as a WHS risk
- Fair Work Act 2009 — relevant to psychosocial hazard management

4. Our WHS Commitments

Greenway Plan Management Pty Ltd is committed to:

- Eliminating or minimising risks to the health, safety, and welfare of all workers
- Providing a psychologically safe work environment free from bullying, harassment, and undue stress
- Ensuring all staff have the information, instruction, training, and supervision necessary to work safely
- Consulting with staff on WHS matters and encouraging active participation in identifying and managing risks
- Maintaining secure systems and processes that protect participant data — recognising data security as a WHS obligation in a plan management context
- Continuously reviewing and improving our WHS practices

5. Hazard Identification and Risk Management

As a plan management provider, the primary work environment is office-based or remote (home office). The following risk register identifies the key hazards relevant to our operations and the controls in place to manage them.

Hazard / Risk	Potential Harm	Control Measures	Residual Risk
Sedentary work / poor ergonomics	Musculoskeletal strain, repetitive strain injury	Workstation setup policy, DSE assessment, regular breaks encouraged	Low
Working from home	Isolation, ergonomic risks, blurred work-life boundaries	Remote work policy, regular check-ins, flexible hours, clear boundaries	Low
Psychological / psychosocial hazards	Stress, burnout, compassion fatigue from complex participant situations	Workload management, EAP access, manager check-ins, open-door policy	Medium

Data security / cyber incident	Breach of participant financial and personal data, regulatory penalty	Secure systems, MFA, data handling procedures, staff training, incident response plan	Medium
Fraud or financial mismanagement	Misuse of NDIS funds, reputational and regulatory harm	Segregation of duties, invoice verification process, audit trail, NDIS portal reconciliation	Medium
Lone working / remote access	Limited oversight, delayed identification of wellbeing issues	Regular team contact, accessible management, clear escalation path	Low
Natural disaster / business continuity	Loss of access to systems, inability to process participant invoices	Cloud-based systems, data backup policy, business continuity plan	Low

Risks are reviewed at least annually, or following any incident, significant change in working arrangements, or introduction of new systems or processes.

6. Specific WHS Procedures

6.1 Workstation and Ergonomics

All staff working from an office or home office are required to set up their workstation in accordance with ergonomic guidelines. The company will:

- Provide or reimburse appropriate equipment for home office setup where required
- Encourage staff to take regular screen breaks (at minimum every 60 minutes)
- Respond to any ergonomic concerns raised by staff in a timely manner

6.2 Remote and Home-Based Work

Remote work is a standard and supported arrangement. Staff working from home are expected to:

- Maintain a dedicated, safe, and ergonomic workspace
- Report any WHS concerns about their home work environment to management
- Maintain clear boundaries between work hours and personal time to prevent burnout

Greenway Plan Management Pty Ltd will conduct a brief remote work safety checklist with all staff who work from home arrangements, and will review this annually or when arrangements change.

6.3 Psychological Safety and Psychosocial Hazards

Greenway Plan Management Pty Ltd recognises that psychosocial hazards including excessive workload, poor support, and interpersonal conflict are a significant WHS risk in service-based roles. We manage this through:

- Regular one-on-one check-ins between staff and management

- Clearly documented workload expectations and escalation pathways
- Access to an Employee Assistance Program (EAP) or equivalent confidential support service
- A zero-tolerance approach to bullying, harassment, and discrimination
- Open communication encouraged at all levels of the organisation

6.4 Data Security as a WHS Obligation

Plan management involves handling sensitive participant financial and personal information. A data breach or cyber incident can cause significant harm both to participants and to staff through regulatory and reputational consequences. Controls include:

- Multi-factor authentication (MFA) required for all systems holding participant or NDIS data
- Staff training on phishing, secure password management, and data handling
- Secure, encrypted storage of all participant records
- Clear procedures for reporting and responding to data security incidents
- Regular review of system access permissions, with access removed promptly on staff departure

6.5 Incident Reporting

All WHS incidents including near misses must be reported promptly to management. This includes physical injuries, psychological harm, cyber incidents, and any situation where participant safety may be affected by a failure in our systems or processes.

- Incidents are recorded and investigated in accordance with our Incident Management Policy
- Serious incidents are reported to the relevant WHS regulator and, where applicable, the NDIS Quality and Safeguards Commission
- All incident records are retained for a minimum of 5 years

6.6 Emergency Procedures

All staff are aware of emergency evacuation procedures for any shared office space. Staff working from home are encouraged to be familiar with emergency procedures relevant to their home address. Emergency contact details for all staff are maintained by management.

7. Roles and Responsibilities

Role	WHS Responsibilities
Director / Responsible Person	Overall accountability for WHS compliance. Ensures policy is implemented, reviewed, and resourced. Reports notifiable incidents to the WHS regulator as required.
All Staff	Take reasonable care for their own health and safety and that of others. Report hazards, incidents, and near misses promptly. Participate in WHS training and comply with all WHS procedures.
Contractors	Comply with the WHS policy and any specific instructions provided. Report any WHS concerns to the relevant person immediately.

8. Consultation and Communication

Greenway Plan Management Pty Ltd consults with all staff on WHS matters. This includes:

- Discussing WHS as a standing agenda item in team meetings
- Inviting staff to raise WHS concerns at any time without fear of reprisal
- Communicating any changes to WHS procedures clearly and promptly
- Seeking staff input when reviewing or updating this policy

9. Training and Induction

All new staff receive WHS induction prior to commencing work, covering:

- This policy and key WHS procedures
- Ergonomics and safe workstation setup (including home office)
- Data security and privacy obligations relevant to plan management
- Incident and hazard reporting procedures
- Psychological safety and how to access support

WHS training is refreshed annually and whenever significant changes occur to work arrangements or systems.

10. What This Means for Our Participants

As your plan manager, our WHS commitments directly protect you.

Our data security practices keep your personal and financial information safe.

Our staff wellbeing practices mean you are supported by a stable, skilled team.

Our systems and processes are maintained to ensure your invoices are processed accurately, on time, and without error.

If you have any concerns about how we handle your information or manage our service, please contact us at hello@greenwayplans.com.au.

11. Policy Review

This policy is reviewed at least annually, or following:

- Any WHS incident or near miss
- Significant changes to staffing or working arrangements
- Changes to relevant legislation or NDIS Practice Standards

- Introduction of new systems, software, or processes

Staff are notified of any material changes to this policy and are asked to confirm their understanding.

12. Related Documents

- Incident Management Policy
- Complaints Management and Resolution Policy
- Privacy and Confidentiality Policy
- Remote Work Safety Checklist
- Data Security and Breach Response Procedure
- NDIS Code of Conduct

13. References

- Work Health and Safety Act 2011 (Cth)
- Work Health and Safety Regulations 2011 (Cth)
- NDIS Practice Standards
- National Disability Insurance Scheme Act 2013
- Privacy Act 1988 (Cth)
- Safe Work Australia — Model Code of Practice: Managing Psychosocial Hazards at Work

Document Control

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