

28 July 2017



Mr Trevor Smith
Fyi-request-6124-f9c55bf5@requests.fyi.org.nz

Dear Mr Smith

Official Information Act Request

Thank you for your email of 4 July 2017, requesting the following information:

The following ACC policies:

- 1. The ACC staff Code of Conduct*
- 2. Internal procedure established and published by ACC as per section 7 of the Protected Disclosure Act 2000*
- 3. ACC policy when a member of the public reports an ACC staff member of acting unethically or of serious wrong doing*
- 4. Worksafe policies*
- 5. ACC policy on what action will be taken when a staff member does not bring to the attention of the authority as instructed in the internal procedure to carry out the investigation.*

As advised earlier, because of the nature of your request, ACC is treating it as a request for information under the Official Information Act 1982.

Our response

The following documents are the policies and procedures that are relevant to your request. These are accurate as at 19 July 2017, the date they were downloaded from ACC's intranet. They are attached to this response.

- The ACC staff Code of Conduct, in response to your requests 1 and 5. (Document 1, 6 pages)
- 'Make a protected disclosure' procedures and the Protected Disclosure policy, in response to your requests 2 and 3 (Document 2, 4 pages)
- In response to your request number 4 we are providing ACC's Health and Safety policy (Document 3, 6 pages)

Questions or concerns

If you have any questions we will be happy to work with you to resolve these. We can be contacted via email at GovernmentServices@acc.co.nz.

You also have the right to make a complaint to the Office of the Ombudsman. You can call them on 0800 802 602 between 9am and 5pm on weekdays, or write to *The Office of the Ombudsman, PO Box 10152, Wellington 6143*.

Yours sincerely

Government Engagement and Support

Enclosures Document 1 – ACC staff code of conduct
 Document 2 – protected disclosure procedures and policy
 Document 3 – health and safety policy

Code of Conduct

Introduction

Everyone who works for ACC has an important role to play in making sure we achieve our vision that 'ACC creates a unique partnership with every New Zealander, improving their quality of life by minimising the incidence and impact of injury.'

How we go about our business is as important as what we deliver. As a Crown entity, ACC is part of the State Sector and contributes to building the trust and confidence of citizens in the institutions of government.

All State Sector organisations are expected to work with a spirit of service to the community, to make our services accessible and effective to those who need them, and to strive to make a positive difference to the wellbeing of New Zealanders. Our actions and behaviours must be consistent with these expectations at all times.

ACC is charged with the implementation of the Accident Compensation Act 2001. The Corporation's reputation and standing is largely determined by public perception of employee conduct.

All ACC employees and contractors are expected to maintain the highest standards of integrity, discretion and ethical conduct when performing duties or representing the Corporation in any way.

This code of conduct sets the required standards of conduct for all ACC employees, to enable us to meet the expectations placed upon us as a Crown Entity. These standards are based on the standards that apply to all State Servants, detailed in the State Services Standard of Integrity and Conduct ([external link](#)).

The Code of Conduct:

- can be used to provide coaching on appropriate conduct
- enables recognition of those who model the desired standard of conduct
- reflects and reinforces the ACC values, in particular, the standards of integrity required
- outlines inappropriate behaviour and its consequences.

Everyone who works for ACC must read, understand and follow our Code of Conduct. All employees are required to undertake a code of conduct elearning module when they join ACC. Talk to your manager if you have any concerns about what might be considered unacceptable behaviour, or before you take a course of action that you are not entirely sure falls within the bounds of acceptable behaviour.

If you believe someone in ACC is acting unethically or has been involved in serious wrongdoing you should report this confidentially through OKtoSay – and receive protection under the Protected Disclosure Act. For more information go to [Make a protected disclosure](#).

Expectations of all employees

You are expected to exercise good judgement to determine what action to take in a given situation. Your actions need to be able to withstand scrutiny from internal and external parties. Our behaviour and actions must be seen to be fair, impartial, responsible and trustworthy at all times.

In order to achieve the high standards of behaviour expected of us, as an employee or contractor you must:

1. Be honest and act with integrity in all aspects of your employment (eg in your work with clients and levy payers, with regard to work attendance, requests for financial reimbursement, use of sick leave etc).
2. Respect the rights of others by:
 - treating others fairly, courteously and without discrimination or harassment
 - upholding the rights of clients, as specified in the Code of ACC Claimants' Rights
 - being respectful of, and responsive to, all cultures, values and beliefs, particularly Māori and those of ethnic or minority groups
 - promoting the principles of Equal Employment Opportunities.

Refer to the equal opportunities in employment policy, bullying and harassment policy, and Code of ACC Claimant's rights (16KB), see also Working with the Code of ACC Claimants' Rights in CHIPS.

3. Perform your duties to the best of your ability by:
 - ensuring your primary role as an ACC employee takes precedence over any secondary interests, commitments, values or beliefs you personally hold, and declare any potential for a conflict of interest immediately
 - showing commitment to a high quality of work performed in a manner consistent with the ACC WorkSAFE policies
 - complying with all ACC policies, processes and standards
 - modelling and demonstrating our values of:
 - People before process
 - Safe kiwis
 - Good partners
 - Fair and open
 - Responsible stewards.

These organisational values underpin decisions about what we do, how we operate and behave.

- complying with the code of any professional body that you are registered or affiliated with, where this impacts upon your work with ACC
- showing initiative and being creative in resolving problems, seeking improved productivity and identifying opportunities for improvement
- making decisions appropriate to your role and being responsible for those decisions and the actions that result from them
- being supportive of changes made by the Corporation, as change is necessary for ACC's success
- being supportive of your colleagues and accepting your responsibilities as a team member
- making sure you manage your personal and workplace relationships appropriately so they do not adversely affect the way you do your work.

Refer to the Conflict of interest policy, Health and safety policy, Delegations Manual, and Taking leave policy.

4. Uphold the reputation and standing of ACC by:

- acting with integrity in any personal dealings you may have with ACC as a client
- obtaining your manager's approval before commencing any activity, business interest or employment that has the potential to conflict with ACC business (eg acting as an advocate for a client, undertaking secondary employment)
- ensuring your behaviour in relation to gifts and gratuities and managing contracts and purchasing does not compromise (or appear to compromise) your personal integrity or the Corporation
- maintaining the same standard of behaviour, as if you were at work, when travelling on Corporation business or in situations where you could be perceived as a representative of ACC
- having a professional standard of dress
- forwarding any media enquiries to the Media team, who will advise you on how the query is to be handled
- behaving in a manner that will not bring ACC into disrepute
- advising your manager if convictions or charges are laid against you whilst working for ACC
- maintaining appropriate boundaries and relationships with clients and the people that you work with.

Refer to the dress code, conflict of interest policy, procurement policy, sensitive expenditure policy, media policy, and social media policy.

5. Act in a politically neutral manner by ensuring:

- that your behaviour maintains Ministerial and public confidence in the impartiality of advice given and actions taken
- your individual comments do not compromise either the Corporation or the Minister (eg stating or implying your personal view on an issue is the Corporation's view)
- your participation in political matters does not bring you into conflict or the appearance of conflict with your duty to act in a politically neutral manner.

Refer to the State Services Standard of Integrity and Conduct, conflict of interest policy, and social media policy.

6. Use ACC information and property appropriately by:

- being responsible for the security and confidentiality of all information that you deal with during your employment with ACC
- using financial and non-financial information gathered by ACC and your knowledge of ACC's systems and processes only to perform the Corporation's business
- treating all ACC assets with care and respect
- taking all reasonable steps to protect client privacy
- reporting any actual or potential privacy breach immediately to your manager.

Refer to the privacy policy, social media policy, information security policies, fraud policy,

and internet access, email and instant messaging policy.

7. Act within the law (in particular Accident Compensation Act 2001, Official Information Act 1982, Privacy Act 1993, Health Information Privacy Code 1994, Human Rights Act 1993, Employment Relations Act 2000 but including any other relevant legislation).

Additional expectations for managers

Managers are representatives of ACC both when dealing with external customers or stakeholders, and when dealing with internal employees and contractors.

Managers have a lead role in establishing and promoting our expected standards of behaviour and integrity. Managers are expected to consider their behaviour, actions and decisions in terms of the expectation to be fair, impartial, trustworthy and responsible at all times.

As a manager you are expected to:

- manage employees in line with the Code of Conduct, and other ACC policies, processes, standards and systems in place to support you as a manager (eg coaching programme, performance management processes)
- lead, model and promote the expected standards of behaviour and integrity within the Code of Conduct and other internal policies and processes, providing employees with education on these where needed
- represent ACC positively when interacting with staff, and deliver our policies, changes, initiatives or decisions in a manner consistent with ACC's intentions
- take ultimate responsibility for work quality, actions and decisions of employees in your team
- manage within your capabilities and take ownership of your own development and that of your team
- manage within the delegated authorities framework as specified in the Delegations Manual.

Misconduct and serious misconduct

Behaviour or actions that are investigated and found to be in breach of the Code of Conduct may result in disciplinary action. In all instances the discipline and dismissal procedures on The Sauce, will be followed and the employee will have an opportunity to provide an explanation for their actions or behaviours and have the right of representation.

The action taken will depend on the severity of the breach:

- Breaches of the Code of Conduct that are deemed 'misconduct' may lead to disciplinary action up to and including a final warning.
- Breaches of the Code of Conduct that are deemed 'serious misconduct' may lead to disciplinary action up to and including summary dismissal. Summary dismissal is termination of employment without notice or prior warnings.
- If any breaches normally considered to be misconduct are very serious or repeated, these may be deemed serious misconduct and could result in disciplinary action up to and including summary dismissal.

Misconduct

The lists below of actions considered to be misconduct or serious misconduct are intended as a guide for employees, and are examples only. They do not constitute an exhaustive list of breaches of the Code of Conduct. Talk to your manager if you have any concerns about

what might be considered unacceptable behaviour or before you take a course of action that you are not entirely sure falls within the bounds of acceptable behaviour.

Examples of misconduct include:

- any act of negligence injuring the Corporation
- disobeying a lawful and reasonable instruction from a manager
- failure to meet the standards of performance and behaviour expected of ACC employees
- inappropriate behaviour or relationships
- any action which may in any way damage the relationship of trust and confidence between ACC and government, other agencies or the community
- allowing unauthorised access to, or disclosure of, any matter or information in relation to ACC business
- misuse of ACC internet and/or email systems
- absence from duty or place of work without proper reason or authorisation, repeated lateness for work, or repeated absenteeism without just cause
- failure to comply with any ACC policy or procedural requirements
- any behaviour of a similar type.

Serious misconduct

Examples of serious misconduct include:

- dishonesty of any kind
- theft
- fraud against ACC or a claimant
- handling a claim relating to oneself, a relative, acquaintance or friend without the express approval of the manager, or taking a role as an advocate for a client without approval
- corruption – accepting a bribe, inducement, reward or gift, or complying with a request or threat to use your position to provide a benefit to any person or third party, which has the effect of allowing inappropriate activity or compromising the impartial performance of your duties.
- failure to declare any activity, business interest or employment that has the potential to conflict with ACC business
- accessing ACC information relating to family, friends, acquaintances or clients without legitimate cause
- criminal conviction, leading to imprisonment or adversely affecting your ability to carry out your work. Offences generally considered unacceptable are outlined in the Screening for Criminal Convictions policy (56KB) but will be determined according to the nature of the employee's role
- misuse or unauthorised possession or sharing of ACC property and/or information (eg misuse of financial information or client information)
- harassment of anyone you work with (eg client, employee, contractor)
- abusive or discriminatory statements or practices

- fighting with, assaulting or abusing another person
- drug, alcohol or substance abuse during working hours or work performance affected by drug, alcohol or substance abuse
- dangerous or unsafe work practices, including non-compliance with ACC WorkSAFE and health and safety legislation
- any act that has the potential to bring ACC into disrepute
- significant failure to comply with any ACC policy or procedural requirements
- any behaviour of a similar type to those mentioned above.

Accountabilities

The Chief Talent Officer is responsible for ensuring organisational controls are in place in support of this policy.

Contact for information

HR Help

Note:

This version of the ACC employee code of conduct came into force on 30 November 2012.

Make a protected disclosure

Report something that you think is wrong and understand what protection you'll get under the Protected Disclosures Act.

Make a protected disclosure using OK2Say

If you, as an ACC employee, know or suspect a serious wrongdoing has occurred (or is occurring), follow this procedure to make a confidential and protected disclosure using the external service provided to us by Deloitte called OK2Say:

1. Read the protected disclosure policy.
2. Gather together as much information as possible for the report, eg:
 - name/s of person/people involved
 - name/s of any witnesses
 - date, time and location of the suspected wrongdoing
 - details of any proof
 - money or assets involved
 - how often the suspected wrongdoing has happened.
3. Decide on what method of reporting you want to use:
 - **Phone:** 0800 OK 2 Say (0800 652 729)
 - All calls to the OK2Say hotline are handled by an independent call centre operator provided by Deloitte.
 - Your call is not recorded, and there is no caller ID to identify your phone number or where you are calling from.
 - **Email:** help@ok2say.co.nz

Your email address will not be supplied to us (ie ACC) without your consent – remember your identity and email may not be secure or confidential as email records are accessible by others (including us if you are reporting the wrongdoing using your ACC email address).
 - **Internet:**

Go to www.OK2Say.deloitte.com.au and enter:

 - Username: ACC
 - Password: ok2say# (password is case sensitive)
 - **Post** (free post):

The Whistleblower Service
PO Box 912028
Victoria Street West
Auckland
1142

Other methods of reporting and when to use them

Direct contact with ACC's Company Disclosures Officer

You can choose to meet in person, telephone or email the Company Disclosures Officer instead of using the OK2Say service.

Choosing the direct contact option means absolute anonymity is not possible, since the Company Disclosures Officer will know your identity (although the issue will be handled with the same level of confidentiality as if it were reported through the external OK2Say service).

Direct contact with the Chief Executive (in limited circumstances)

You can make protected disclosure directly to the Chief Executive if you suspect that either that the Company Disclosures Officer is:

- involved in the suspected serious wrongdoing
- not an appropriate person to receive the notification because of a relationship or association with a person who is, or may be, involved in the serious wrongdoing.

In these circumstances, the Chief Executive is responsible to act as the Company Disclosures Officer and will have the same obligations following receipt of a notification of serious wrongdoing.

Direct contact with the external authorities (in limited circumstances)

A protected disclosure may be made directly to an external authority (such as the Police, Office of the Auditor-General, Serious Fraud Office, Ombudsman, or Solicitor-General, but excluding a Member of Parliament or Minister of the Crown) if you have reasonable grounds for believing that:

- the Chief Executive is, or may be, involved in the suspected serious wrongdoing
- immediate reference to the external authority is justified due to the urgency of the matter (or there are other exceptional circumstances)
- after 20 working days of reporting the serious wrongdoing there has been no action or recommended action on the matter to which the disclosure relates.

Direct contact with the ACC Minister or Ombudsmen (in limited circumstances)

A protected disclosure may be made to the ACC Minister or an Ombudsman if you:

- have already made substantially the same disclosure in accordance with the policy and guidelines, or to the Chief Executive or external authorities (if applicable); and
- have reasonable grounds for believing that the previous report has **not** been dealt with appropriately; and
- continue to have reasonable grounds for believing that the information disclosed is true (or likely to be true).

Confidentiality when making a disclosure

When you report wrongdoing it's dealt with by the Company Disclosures Officer and Disclosures Committee on a strictly confidential basis (whether or not they are protected disclosures under the Protected Disclosures Act), subject to applicable law.

All ACC employees who are involved in or become aware of an inquiry into suspected wrongdoing must keep the details and results of any inquiry confidential.

When you make a disclosure of serious wrongdoing, the Act provides you with the following protections:

- You may have a personal grievance if you face retaliation or dismissal.
- You may have immunity from civil and criminal proceedings.
- Your disclosure will be confidential – but we may **not** be able to maintain confidentiality if the information you hold is essential:
 - to the effective investigation of the allegations (ie the information you provide is vital for proving or disproving the allegation)
 - for preventing serious harm to public health or public safety or the environment
 - in regard to the [principles of natural justice](#) (external link).

If for these reasons we can't maintain confidentiality we will contact you as soon as possible.

What happens after you've reported serious wrongdoing

1. All serious wrongdoing reports go to the Company Disclosures Officer within one working day of receipt.

2. The Company Disclosures Officer refers the report to the Disclosures Committee – if there is an immediate threat or danger to a person or property, then they will refer the matter immediately to the Police.
3. If you've identified yourself, you'll receive an acknowledgement of your report from the Company Disclosures Officer, setting out the next steps and the available options under the [Protected Disclosures Act 2000](#).
4. The Disclosures Committee hold an inquiry and prepares a report. It holds the findings, recommendations, responses to allegations, together with an assessment of the allegations and recommended next steps.
5. The report will be supplied to you – with as much information as allowed under the Privacy Act – if you have provided your name.
6. If the Disclosures Committee finds that serious wrongdoing has taken place, it decides on whether to:
 - make a recommendation to the Chief Executive for a decision – and if the wrongdoing involves the Company Disclosures Officer or Chief Executive – the Board Chair
 - refer the case to law enforcement or other external agency, eg Police, the Serious Fraud Office, or the Office of the Auditor General, if applicable
 - refer the case to Human Resources and/or the serious wrongdoer's manager for disciplinary action.

Protected disclosure policy

Policy statement

ACC will encourage and enable employees to raise concerns about serious wrongdoing.

Objective

This policy aims to:

- encourage ACC employees to raise concerns about serious wrongdoing at work
- set standards to enable and protect employees who disclose information (protected disclosure) about serious wrongdoing.

Scope

This policy applies to all ACC employees working on behalf of ACC.

Policy standards

ACC will:

- treat all the details of any inquiry into suspected serious wrongdoing as strictly confidential
- protect employees who disclose information in good faith about a suspected serious wrongdoing
- maintain and promote procedures for receiving, assessing and managing disclosures of serious wrongdoing
- have a primary point of contact for disclosures of serious wrongdoing
- maintain a Disclosure Committee who regularly meet to investigate and action disclosures raised.

All ACC employees are encouraged to:

- report all incidence of suspected serious wrongdoing, and
- treat the details of any inquiry into suspected serious wrongdoing as strictly confidential.

Accountabilities

The Head of Integrity Services has overall responsibility and accountability for the implementation of this policy.

Responsibilities

The Chief Governance & Strategy Officer will act as the Company Disclosures Officer and Chair of the Disclosure Committee.

The Company Disclosures Officer will be the point of contact for disclosures of serious wrongdoing. He or she will handle the collection of information and coordination with the disclosure committee.

Breaches of policy

Complying with all policies and procedures is an expectation outlined in the Code of Conduct. Behaviour or actions that are investigated and found to be in breach of the Code of Conduct may result in disciplinary action. For further information, go to:

[Code of Conduct](#)

Contacts

The Integrity Investigations Manager is the point of contact regarding issues of interpretation or management of this policy.

Health and safety policy

Policy statement

The health and safety policy sets out the standards that support the development, delivery, monitoring and review of ACC's safety system.

ACC is committed to being a leader in health and safety in New Zealand. This means having a strong safety culture in the workplace, focussing on prevention of injury and illness, providing high quality injury management and continuously improving ACC's health and safety system.

ACC is committed to providing and maintaining healthy and safe environments for all ACC workers and other workers it influences or directs. It recognises the importance of maintaining safe workplaces not only for its workers but to customers, visitors and the general public.

Objective

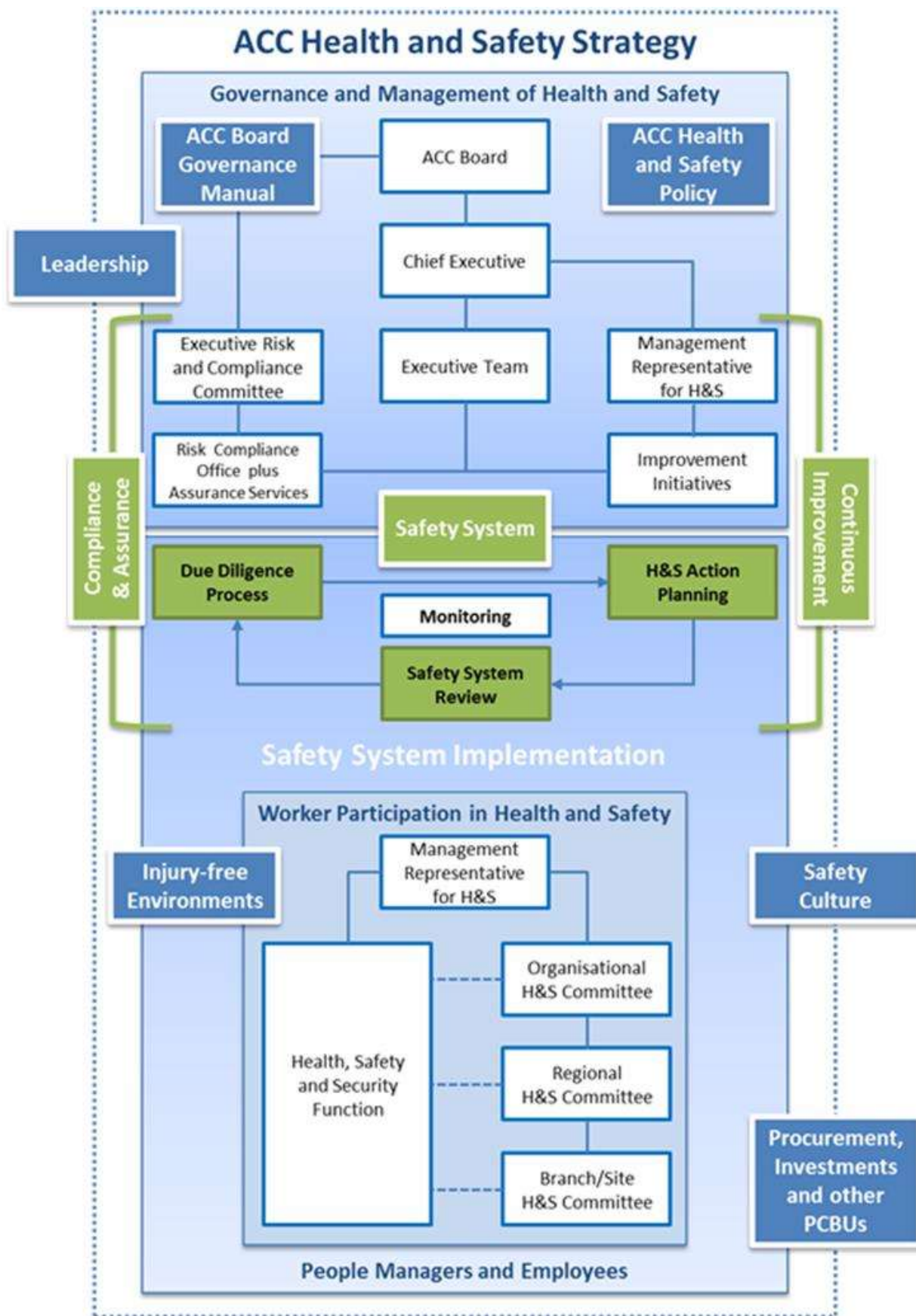
This policy aims to promote high standards of health and safety and to ensure compliance and regulations to make our environments and those we have influence over injury free.

Scope

This policy relates to all ACC staff, and people ACC has influence over such as contractors, third parties to the extent of our influence, and visitors.

ACC safety system overview

An overview of ACC's safety system is detailed in below and shows how key aspects of the safety system work together to achieve strategic objectives for health and safety as delivered through this policy:



Policy standards

Everyone knows what their health and safety responsibilities and duties are

All staff, contractors, third parties and visitors must actively maintain safe work behaviours and report incidents, hazards and near misses. Information, guidelines, supervision and training programmes are provided for workers and other people on our premises or otherwise within our control. This will reinforce safe behaviours, ensure health and safety hazards are identified, understood and managed effectively to remove or reduce risks to health and safety.

People managers keep staff healthy and safe in their working environment

People manager create an environment where health, safety and wellbeing is always present in team thinking, discussion and decision making. They communicate expectations with staff, monitor compliance, investigate incidents and act on the learnings.

The executive members exercise leadership in health and safety

Executive members ensure that ACC complies with its health and safety duties and obligations. They ensure systems and processes are in place to protect the health and safety of all staff, contractors, third parties, visitors, and other people involved in ACC's work activities.

Safety systems and procedures are user friendly, functional, integrated, visible and valued

To enable this to happen, ACC will ensure:

- systems and procedures are easy to understand and accessible to all
- continuous improvement of our safety system.

Health and safety best practice is embedded in all our business decisions and operations, including business processes, standards, products, procurement and investment practices, programmes and projects.

Effective management of hazards and reduction of health and safety risks

We will be good partners

We work together with other persons conducting a business or undertaking (PCBU) to confirm work undertaken does not pose risks to people's health and safety. We do this by consulting, co-operating and co-ordinating our activities with other persons conducting a business or undertaking to meet shared responsibilities in regard to the health and safety of their workers. This includes for:

- procurement, third party providers managed through ACC's supply chain, keeping workers safe and healthy on our premises or otherwise within our control, and when providing services to our clients.
- investments, due diligence needs to be conducted to determine ACC's duties as a PCBU for investment arrangements. This will determine:
 - (i) whether ACC's investment arrangements give ACC management or control of a workplace, and if it does the extent of that influence and control over health and safety matters
 - (ii) where other PCBUs are involved and their level of influence and control over health and safety matters.

Promote engagement through worker and union participation and consultation to improve health and safety outcomes

ACC will promote engagement and participation through health and safety committees and other forums as appropriate. A worker participation agreement defines the terms of an agreed system for worker participation and co-operation between ACC, workers and their

unions to improve health and safety in the workplace and facilitate implementation of a continuously improving health and safety system and high quality injury management.

Governance structures, assurance processes and reporting frameworks are in place to monitor compliance to health and safety policy

This will be achieved by:

- keeping staff safe, enabling them to arrive home in the same mental and physical condition that they left for work. The same applies to people ACC has influence over such as clients, providers and contracted parties to the extent of our influence. This includes ACC's investment arrangements.
- ensuring staff and people ACC have influence over are equipped with the tools, knowledge, understanding and environment to achieve this
- ACC's role and mandate, contributing to system-wide improvements in workplace health and safety
- compliance with workplace legislative obligations including relevant New Zealand standards and codes of practice.

Accountabilities

Board responsibility for health and safety is set out in the ACC Board Governance Manual. This acknowledges that the Board plays a lead role in promoting and achieving the ACC vision of making our environments and those we have influence over injury-free.

At a high level, the Board is responsible for four key elements in the governance of health and safety, which is aligned to the Institute of Directors Good Governance Practices Guideline for Managing Health and Safety Risks. The aspects of this policy that support the four key elements are: (1) Policy and Planning – Policy statement, objective, scope and accountabilities; (2) Delivery – ACC safety system overview, policy standards and responsibilities; (3) Monitoring and (4) Reviewing – Monitoring and oversight through the three lines of defence model.

The Chief Executive is accountable to the Board for implementing the health and safety and policy, and for aligning other strategies with the strategic direction for health and safety.

Each Executive member has specific health and safety accountabilities within their business area. This includes effective implementation of the safety system across staff and third party work activities to ensure compliance with health and safety legislation and regulations is maintained.

The Chief Talent Officer, on behalf of the Chief Executive, has accountability for the operational implementation of this policy.

Responsibilities

All ACC staff are collectively responsible for health and safety at ACC:

- Executive members are responsible for modelling safety leadership behaviours and ensuring that health and safety policies and practices are integrated into all aspects of ACC business practice. They must ensure a high level of health and safety performance is maintained and that adequate resourcing is provided for effective management of staff and third party injuries and illnesses.
- People managers are responsible for complying with the requirements of this policy and creating an environment where health and safety is always present in team thinking, discussion, and decision-making. They must communicate expectations with staff, monitor compliance, ensure accurate reporting, recording and investigation of workplace incidents and support the return to work of injured employees. People managers are responsible for 'setting the standard' for health and safety in the workplace.

- Every employee must take reasonable care for his or her own health and safety, and that his or her acts or omissions do not adversely affect the health and safety of other persons. Employees must comply with any reasonable instruction that is given by ACC to allow ACC to comply with health and safety legislation, and also co-operate with any policy or procedure of ACC relating to health or safety at the workplace. This includes actively maintaining safe work behaviours, identifying risks and hazards, and reporting all incidents and near hits.
- The National Manager Health, Safety and Security, on behalf of the Chief Talent Officer, is responsible for developing and implementing the safety system, and ensuring that operational measures and monitoring is in place to support this policy.

All ACC staff participate in health and safety:

- All employees are encouraged to contribute to continuous improvement by raising issues, generating ideas, and participating in the system development, implementation, monitoring and review.
- Representatives of management, staff and unions who serve on health and safety committees discharge their duties in accordance with the terms of reference for Health and Safety Committees, which operate at an organisational, regional and local level.
- The health and safety committee structure provides a way for employees to participate in matters of health and safety in the workplace that affect them, and to participate effectively in improving health and safety.
- The Organisational Health and Safety Committee, chaired by the Chief Talent Officer, is responsible for the annual review of ACC's safety system and the planning and monitoring of improvement initiatives.

Monitoring and oversight

ACC's safety system has been established to comply with the:

- audit standard requirements of the Accredited Employer Programme
- health and safety legislation, regulations and good practice guidance.

The monitoring and oversight of the safety system follows the three lines of defence assurance model to provide assurance that staff and third-party health and safety risks are being managed effectively under different situations.

First line of defence

Embedding health and safety responsibilities in the business; regular health and safety training and updates; monitoring and reporting; travel, managing risky clients, building safety and security, health initiatives

Second line of defence

Annual health and safety management review of the safety system, undertaken by the Organisational Health and Safety Committee, as part of the health and safety due diligence process. This review assesses how ACC is tracking against the ACC Health and Safety Strategy.

Annual health and safety due diligence report to the Executive Team and Board for an in-depth review of health and safety performance, maturity of our safety culture, progress against strategic objectives and milestones, and approval of the health and safety action plan for each financial year.

Monthly reporting by the Chief Talent Officer to the Executive Team and Board to monitor health and safety performance, and progress against the health and safety action plan.

Third line of defence

Annual assessment by an independent auditor of ACC's safety system against the Accredited Employer Programme requirements as a condition of participation in the incentive programme

ACC Assurance Services schedule of continuous assurance activities for health and safety

External safety system audits and reviews as requested by the Executive Team or Board (eg participation in the WorkSafe Safety Star Rating Scheme)

Breaches of policy

Complying with all policies and procedures is a requirement outlined in the Code of Conduct. Behaviour or actions that are investigated and found to be in breach of the Code of Conduct may result in disciplinary action. Refer to Code of Conduct for further information.

Contacts

The Health, Safety and Security Team can be contacted in relation to any queries regarding this policy: [Health, Safety and Security Team](#)

Supporting procedures and guides

- ACC Guide to embedding health and safety best practice (584KB)
- Health and safety guidelines:
 - ACC's Health and Safety Commitment
 - Planning, review and evaluation
 - Hazard management
 - Health and safety training
 - Incident reporting, recording and investigation
 - Employee participation
 - Emergency planning and readiness
 - Contractor management
 - Staff claims and rehabilitation
- Worker participation agreement
- Terms of reference for health and safety committees (1MB)
- Safe Kiwis health and safety toolkit for people managers (1MB)
- Safe Kiwis health and safety representative toolkit (733KB)
- The Sauce how to pages:
 - Make an injury claim when you're an ACC employee
 - Deal with stress
 - Safe Kiwis: Dealing with aggressive/dangerous clients
 - Avoid injury
 - Deal with emergencies
 - Ensure your security
 - Family violence and ACC's guiding policies

Supporting policies

- Building security policy
- Worksafe building security policy
- Smoke free policy
- Staff injury claims policy:
 - Staff claims and rehabilitation
 - Staff responsibilities during the work-related injury claim process
 - Staff responsibilities for non-work staff injury claims
 - What to do when I am injured (509KB)
 - Sort out a problem with your staff injury claim