

Policy Owner: Director

Applies to: Workers, including employees, casual employees, interpreters, volunteers, contractors, consultants, and representatives acting on behalf of Echo Interpreting.

Effective Date: 24 July 2026

Review Cycle: Every 2 years or as legislation changes or operational requirements change

1. Purpose

Echo Interpreting is committed to providing and maintaining a working environment that is safe and without risks to physical and psychological health, so far as is reasonably practicable.

This Policy & Procedure establishes Echo Interpreting's approach to:

- Preventing work-related injury and illness
- Identifying and managing physical, psychological and infection-related risks
- Supporting safe work practices across offices, participant and client sites, remote work and work-related travel
- Consulting with workers about matters that may affect their health and safety
- Responding to hazards, incidents, injuries and near misses and learning from them
- Meeting applicable occupational health and safety and NDIS requirements

2. Scope

This Policy & Procedure applies to all work undertaken by or on behalf of Echo Interpreting, including:

- Office-based and administrative work
- Auslan interpreting, notetaking and participation assistance assignments
- Work at participant homes, client premises and other third-party locations
- Remote, home-based and mobile work
- Work-related travel and after-hours work
- Work-related communications, interactions and events

It applies to all workers and representatives acting on behalf of Echo Interpreting. Site-specific requirements may also apply when work is undertaken at an external location.

3. Legislative and Regulatory Framework

This Policy & Procedure is informed by applicable legislation, regulations, standards and guidance, including:

- Occupational Health and Safety Act 2004 (Vic)
- Occupational Health and Safety Regulations 2017 (Vic)
- Occupational Health and Safety (Psychological Health) Regulations 2025 (Vic)
- Work Health and Safety Acts and Regulations in other Australian states and territories, where applicable
- Relevant WorkSafe Victoria, Safe Work Australia and NDIS Quality and Safeguards Commission guidance

Applicable legislation and regulatory requirements apply regardless of whether every requirement is reproduced in this document.

4. WHS Principles

Echo Interpreting's approach is guided by the following principles:

- Physical and psychological health and safety are equally important
- Safety is a shared responsibility, with Echo Interpreting retaining its organisational duties
- Hazards should be identified and risks controlled proactively
- Workers should be consulted about matters that may affect their health and safety
- Workers may remove themselves from an immediate unsafe situation and report the concern without adverse treatment
- Incidents, hazards and near misses should inform corrective action and continuous improvement
- Controls should be proportionate to Echo Interpreting's services, workforce and operating environments

5. Responsibilities

Echo Interpreting will:

- Provide and maintain a working environment that is safe and without risks to health, so far as is reasonably practicable
- Identify hazards and eliminate risks, or minimise them where elimination is not reasonably practicable
- Provide safe systems of work, including for external, remote, mobile and higher-risk assignments
- Consult with workers on WHS matters and consider information provided by workers
- Provide information, instruction, training and supervision appropriate to each worker's role and the risks involved

- Respond promptly to hazards, incidents, injuries, near misses, infection exposures and safety concerns
- Maintain appropriate WHS, incident, training and risk-management records
- Review controls following incidents, material changes, worker feedback or evidence that a control may not be effective

Managers and booking or coordination staff will:

- Consider known health and safety information when planning and allocating work
- Communicate relevant participant, assignment and site-specific safety requirements to workers
- Escalate identified risks that cannot be adequately controlled
- Support workers who raise a concern or remove themselves from an unsafe situation
- Ensure reported matters are documented and referred to the Director as required

Workers must:

- Take reasonable care for their own health and safety
- Take reasonable care that their acts or omissions do not adversely affect the health and safety of others
- Follow reasonable health and safety instructions and applicable site requirements
- Use equipment and PPE safely and as instructed
- Report hazards, incidents, injuries, near misses, infection exposures and other safety concerns as soon as practicable
- Participate in required WHS information, instruction or training
- Cooperate with reasonable risk controls, incident reviews and corrective actions
- Not undertake or continue work where they reasonably believe there is an immediate and serious risk to health or safety

6. Consultation and Communication

Echo Interpreting will consult with workers, so far as is reasonably practicable, when identifying hazards, assessing risks, deciding on controls, proposing changes that may affect health and safety, or reviewing incidents and controls.

Consultation may occur through:

- Team discussions, supervision and direct communication
- Feedback from casual workers following assignments
- Incident, near miss and hazard reports
- Policy consultation and acknowledgement processes
- Targeted consultation when work practices, systems or assignment arrangements change

Workers are encouraged to raise concerns early with their manager, booking or coordination staff, or the Director. Urgent risks must be reported immediately.

7. Hazard Identification and Risk Management

Hazards may be identified through:

- Worker observations, feedback and reports
- Assignment information and booking processes
- Incidents, injuries, near misses and complaints
- Review of work practices, workplaces and equipment
- Changes to services, staffing, systems, locations or legal requirements

Common risks associated with Echo Interpreting's work may include:

- Travel between assignments, road safety and fatigue
- Slips, trips and falls at unfamiliar locations
- Ergonomic or musculoskeletal risks from prolonged interpreting, notetaking or screen-based work
- Working alone, after hours or in isolated environments
- Aggressive, abusive, threatening or unpredictable behaviour
- High workloads, inadequate recovery time, unclear roles or insufficient support
- Exposure to distressing, traumatic or emotionally demanding content
- Communicable illness, infection exposure or inadequate PPE
- Unsafe participant, client or third-party environments

Echo Interpreting will eliminate identified risks where reasonably practicable. Where elimination is not reasonably practicable, risks will be minimised using one or more controls, such as changing the work arrangement, location or delivery method; providing information, support, equipment or PPE; allocating additional workers; or declining, postponing or withdrawing from an assignment.

Risk controls will be reviewed when circumstances change, following an incident or near miss, when a new hazard is identified, when workers indicate that a control is ineffective, or at scheduled policy and risk-register reviews.

8. Psychosocial Health and Safety

Echo Interpreting recognises that work-related psychosocial hazards can cause psychological or physical harm and must be identified and controlled in the same way as other workplace risks.

Psychosocial hazards may include:

- Bullying, harassment, sexual harassment, discrimination or gendered violence
- Aggression, abuse, threats or occupational violence
- High job demands, fatigue, inadequate recovery time or conflicting demands

- Poor support, isolation, unclear roles or inadequate information
- Exposure to traumatic events, distressing information or emotionally demanding assignments
- Remote or lone work and limited access to assistance

Controls may include:

- Clear work expectations, professional boundaries and respectful workplace standards
- Appropriate workload, scheduling, breaks and interpreter allocation
- Pre-assignment information and additional support for challenging work
- Opportunities for debriefing or support following critical or distressing incidents
- Alternative work arrangements or withdrawal from an unsafe assignment
- Prompt, fair and confidential response to reported concerns

A psychosocial hazard or safety concern should be reported through Echo Interpreting's incident or hazard reporting process. A complaint about conduct may also be raised under the Complaints & Feedback Policy & Procedure or the relevant workplace conduct policy.

9. Working at Participant, Client and Third-Party Sites

Before and during work at an external location, workers must:

- Follow reasonable site-specific health, safety, emergency, infection-control and PPE requirements
- Remain alert to unfamiliar environmental hazards and changes in circumstances
- Not undertake tasks outside their role or competency
- Notify Echo Interpreting of hazards or relevant safety information that was not known at the time of booking
- Prioritise immediate safety and leave the area where there is an immediate and serious risk, where safe to do so

If a worker feels unsafe, threatened or unable to perform the assignment safely, they should move to a safe location, contact emergency services where required, and notify Echo Interpreting as soon as practicable.

10. Higher-Risk Assignments, Safety Concerns & Assignment Planning

Echo Interpreting recognises that some interpreting assignments, environments, or circumstances may present increased risks to worker health, safety, or wellbeing.

Where a potential safety concern is identified before an assignment, Echo Interpreting will assess the circumstances and implement reasonable controls where appropriate.

Booking and coordination staff will consider:

- Whether the assignment is at a participant home, community setting or unfamiliar location

- Any known history of aggression, volatility, abuse, threats, incidents or safety concerns
- Whether the work involves isolation, lone work, after-hours work or limited access to assistance
- Travel requirements, fatigue, accessibility and safe entry or exit arrangements
- Whether the content or circumstances may be traumatic or emotionally demanding
- Any known infection-prevention, communicable-illness or PPE requirements
- Whether a second interpreter, support person, alternative location, remote delivery or other control is required

Workers are not required to remain in situations where they reasonably believe there is an immediate risk to their health or safety.

Where a safety concern arises during an assignment, workers should:

- Prioritise their immediate safety;
- Remove themselves from the situation if required and safe to do so;
- Notify Echo Interpreting as soon as practicable;
- Complete an Incident / Near Miss Report where required

Echo Interpreting supports workers exercising professional judgement in relation to their safety and will review reported concerns to support future risk management and continuous improvement.

Relevant information must be handled confidentially and communicated only to the extent reasonably necessary to support safe service delivery. If a risk cannot be adequately controlled, Echo Interpreting may decline, modify, postpone, suspend or withdraw from the assignment.

11. Infection Prevention and Control

Echo Interpreting maintains infection prevention and control measures proportionate to its services and the environments in which those services are provided.

Echo Interpreting's services do not ordinarily involve activities requiring PPE. However, PPE may be required in some participant, healthcare, host-organisation or workplace settings. Where PPE is required by a participant, host organisation, workplace or applicable public health requirement, Echo will communicate any known requirements to the worker and, so far as reasonably practicable, confirm that appropriate PPE will be available at the assignment.

Echo Interpreting will:

- Provide workers with information and instructions about standard infection-control precautions, including hand hygiene, respiratory hygiene, cough etiquette, communicable illness and exposure reporting
- Communicate any known participant-specific, host-organisation or workplace infection-control requirements before an assignment
- Require infection prevention and control information to be addressed during worker induction and updated when identified risks or requirements change

- Inform workers of any known PPE requirements before an assignment, including available instructions regarding its safe use
- Where PPE is required, confirm so far as reasonably practicable that appropriate PPE will be available from the participant, host organisation or workplace. Echo Interpreting does not routinely supply PPE to its casual interpreting workforce
- Respond appropriately to reported communicable-illness risks, infection exposures or PPE concerns

Workers must:

- Practise appropriate hand hygiene before and after in-person assignments and at other appropriate times
- Follow respiratory hygiene and cough etiquette
- Not attend an assignment when experiencing a communicable illness or where attendance may place others at risk
- Follow participant, host-organisation and workplace infection-control requirements
- Use PPE where required by the participant, host organisation, workplace, Echo Interpreting or applicable public health requirements
- Immediately advise Echo Interpreting if they cannot attend an assignment due to illness, communicable disease or a relevant exposure
- Report infection-prevention, exposure or PPE concerns through Echo Interpreting's incident reporting process as soon as practicable
- Follow reasonable additional precautions communicated in response to an identified infection risk or current public health advice

12. Remote, Home-Based, and Mobile Work

Echo Interpreting recognises that remote, home-based and mobile work may create specific health and safety risks. These include poorly configured workstations, repetitive or restricted movement, sustained or awkward postures, fatigue, isolation, unsafe travel and limitations arising from the online working environment.

For Video Remote Interpreting (VRI), the need to remain visible within the camera frame may restrict natural body movement and contribute to repetitive or sustained use of the hands, arms, shoulders, neck and upper body. These risks may increase where assignments are lengthy, scheduled consecutively or undertaken without adequate breaks and changes in posture.

So far as reasonably practicable, Echo Interpreting will:

- Identify and assess health and safety risks associated with remote, home-based and mobile work, in consultation with affected workers
- Provide workers with information and guidance on safe workstation setup, ergonomics, movement, fatigue management and safe VRI work practices
- Consider assignment duration, complexity and scheduling when managing the risks of repetitive movement, restricted posture and fatigue

- Support reasonable breaks, recovery time and variation in tasks or posture between assignments
- Respond promptly to reported hazards, discomfort, symptoms, injuries or changes affecting a worker's capacity to work safely
- Review working arrangements and implement additional controls where a risk or concern is identified
- Maintain appropriate processes for worker contact, consultation and incident reporting.

Workers undertaking remote, home-based or mobile work are expected to:

- Maintain a safe working environment, so far as reasonably practicable
- Set up and adjust their workstation, camera and equipment to support neutral postures and allow the greatest practical range of movement
- Position the camera to provide an appropriate signing frame without unnecessarily restricting body movement
- Take reasonable breaks, change posture and move between assignments to reduce repetitive movement, muscular strain and fatigue
- Avoid, where practicable, prolonged or consecutive VRI assignments without suitable recovery time
- promptly report pain, discomfort, fatigue, restricted movement, hazards, incidents or emerging symptoms, without waiting for an injury to worsen
- Raise concerns where an assignment's duration, scheduling or working conditions may create a health and safety risk
- Maintain privacy, information security and professional boundaries
- Travel safely and lawfully between assignments and not drive when impaired by fatigue, illness, alcohol, drugs or medication
- Follow Echo Interpreting's WHS requirements and any agreed risk controls or workplace adjustments.

Echo Interpreting may require a worker to complete a Work From Home Safety Self-Assessment Checklist or participate in a review of their remote working arrangements. The checklist assists with identifying and controlling risks; it does not constitute a physical inspection of the workplace or remove the shared responsibility of Echo Interpreting and the worker to manage health and safety risks.

13. Incident, Injury, and Hazard Reporting

All work-related incidents, injuries, near misses, hazards, infection exposures and other health or safety concerns must be reported to Echo Interpreting as soon as practicable.

Immediate response:

- Prioritise personal and participant safety
- Call emergency services on 000 where there is an immediate threat to life, health or safety
- Provide or seek first aid where safe and appropriate

- Move to a safe location or stop work where required
- Notify Echo Interpreting as soon as practicable

Internal reporting and follow-up:

Workers must complete an Incident / Near Miss Report as soon as practicable and, where possible, within 24 hours when an incident, injury, near miss, hazard, infection exposure or other material safety concern has occurred.

Echo Interpreting will, as applicable:

- Record the matter in the relevant register
- Assess immediate and ongoing risks and provide appropriate support
- Investigate the circumstances proportionately
- Identify and implement corrective actions
- Consult affected workers and review the effectiveness of controls
- Meet workplace incident-notification, workers compensation, NDIS reportable-incident or other external reporting obligations
- Preserve an incident site where legally required, except where action is necessary to assist an injured person, remove a deceased person, make the site safe or prevent a further incident

The Director, or delegated manager, is responsible for determining whether external notification is required. An incident involving an NDIS participant must also be managed in accordance with the Safeguarding & Incident Management Policy and applicable NDIS requirements.

14. Emergency Response

Workers must follow the emergency procedures of the workplace or site at which they are working. In an emergency, workers should act within their competence, prioritise safety, contact emergency services where required and notify Echo Interpreting as soon as practicable.

Echo Interpreting will coordinate organisational response, communication, worker support, service-continuity actions and external notifications as required. Significant operational disruptions will also be managed under the Business Continuity Plan.

15. Injury Management, Rehabilitation and Return to Work

Work-related injuries or illnesses must be reported promptly. Echo Interpreting will comply with applicable workers compensation and return-to-work obligations and, where required:

- Provide information about reporting, treatment and claim processes
- Maintain appropriate communication with the injured worker
- Protect health information and share it only where authorised or legally required
- Consider suitable duties and reasonable workplace adjustments
- Support safe, timely and sustainable recovery and return-to-work planning

16. Training, Records and Review

Echo Interpreting will maintain records proportionate to its operations, which may include:

- Worker WHS induction and policy acknowledgements
- Infection prevention and control and PPE training records
- Incident, injury, hazard and near miss reports
- Incident and risk registers, investigations and corrective actions
- Consultation and relevant worker feedback
- Workers compensation and return-to-work records, where applicable

Records will be stored securely, with access limited according to role, confidentiality and legal requirements. WHS performance, incidents, trends and outstanding actions will be reviewed periodically to support continuous improvement.

17. Non-Compliance

Failure to comply with this Policy & Procedure or a reasonable health and safety instruction will be addressed proportionately, taking account of the circumstances, seriousness and applicable employment or contractual arrangements.

Possible action may include:

- Further instruction, training or supervision
- Modification or removal from an assignment
- Corrective or disciplinary action
- Termination of employment or engagement
- Referral to an external authority where required

18. Related Documents

This policy must be read and applied in conjunction with:

- Code of Conduct Policy
- Bullying, Harassment & Sexual Harassment Policy
- Safeguarding & Incident Management Policy
- Complaints & Feedback Policy & Procedure
- Incident, Safeguarding & Near Miss Report (Microsoft Form)
- Work From Home Safety Self-Assessment Checklist

19. Policy Acknowledgement

All workers are required to acknowledge that they have read, understood, and agree to comply with this Policy.